



County of Los Angeles

November 18, 2025

Dawyn R. Harrison
County Counsel

Board of Supervisors

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Supervisor, Second District

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The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

**REVISIONS TO BOARD POLICY 3.175 – LIMITING ACCESS TO
COUNTY SENSITIVE LOCATIONS BY LAW ENFORCEMENT OFFICERS
ENGAGED IN IMMIGRATION ENFORCEMENT OR
IMMIGRATION INVESTIGATIVE ACTIVITIES
(ALL DISTRICTS) (3 VOTES)**

SUBJECT



Revisions to Countywide policy that limits the disruption of County services and programs by requiring County officials and employees to not comply with any request by law enforcement officers engaged in immigration enforcement or investigative activities to access non-public areas of County properties or facilities, unless the request is accompanied by a judicial warrant.

IT IS RECOMMENDED THAT THE BOARD:

Adopt the attached revisions to Board Policy 3.175 – Limiting Access to County Sensitive Locations by Law Enforcement Officers Engaged in Immigration Enforcement or Immigration Investigative Activities (Policy).

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

County Counsel recommends revisions to the Policy to affirm the County's commitment to asserting its Constitutional rights under the Fourth and Tenth Amendments, and to affirm the County's compliance with State and federal law.

FISCAL IMPACT/FINANCING

No fiscal impact.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

On April 11, 2017, the Board directed County Counsel and the Chief Executive Office to develop a Countywide sensitive locations policy consistent with federal and State laws. On October 17, 2017, the Board adopted Policy became effective. The County has a strong interest in ensuring unimpeded access to County offices and agencies for all residents. The proposed revisions clarify the County's authority to adopt policies governing the conduct of County employees at County properties and facilities. The Policy continues to distinguish circumstances in which immigration enforcement officers seek access to non-public areas. Also, certain facilities, such as schools and courthouses, remain outside the scope of the Policy because they are regulated by policies adopted by school districts, and the State, respectively.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

To ensure consistent and appropriate implementation, County Counsel will update training materials on the revised Policy and provide them to all County departments. In addition, a dedicated team of County Counsel attorneys will remain available on an ongoing basis to respond to questions from County employees and ensure uniform implementation of the revised Policy.

CONCLUSION

Approval of the proposed revisions to the Policy will minimize disruptions and will provide clear consistent guidance for County employees when responding to situations involving immigration enforcement and investigative activity conducted on property protected by the Policy.

Respectfully submitted,



DAWYN R. HARRISON
County Counsel

Attachment

c: Joseph M. Nicchitta, Acting Chief Executive Officer

Edward Yen, Executive Officer
Board of Supervisors

ATTACHMENT



Los Angeles County **BOARD OF SUPERVISORS POLICY MANUAL**

Policy #:	Title:	Effective Date:
3.175	Limiting Access To County Sensitive Locations by Law Enforcement Officers Engaged in Immigration Enforcement or Immigration Investigative Activities	10/17/2017

PURPOSE

Designates County property and facilities as "sensitive locations" and, to the greatest extent permissible by law, protects the County's rights and limits the disruption of County activities caused by the federal government's immigration enforcement or immigration investigation efforts~~law enforcement officers who seek to access non-public areas of such property and facilities for the purposes of immigration enforcement or immigration investigative activities.~~

REFERENCE

[ICE Common Sense Enforcement Actions, January 31, 2025](#)

[ICE Enforcement Actions in or Near Protected Areas, January, 20 2025](#)

[ICE Interim Guidance, April 27, 2021](#): Civil Immigration Enforcement Actions In Or Near Courthouses

[January 20, 2021 Executive Order](#): Revision of Civil Immigration Enforcement Policies and Priorities

[ICE Directive No. 11072.1, January 10, 2018](#): Civil Immigration Enforcement Actions Inside Courthouses

[January 25, 2017 Executive Order](#): Enhancing Public Safety in the Interior of the United States

[January 27, 2017 Executive Order](#): Protecting the Nation from Foreign Terrorist Entry into the United States

[U.S. Customs and Border Protection Sensitive Locations Policy, January 18, 2013](#)

[ICE Sensitive Locations Policy, October 24, 2011](#)

[Fourth Amendment](#)

[Tenth Amendment](#)

[8 U.S.C. § 1324](#)

[8 U.S.C. § 1373](#)

[8 U.S.C. § 1644](#)

[April 11, 2017 Board Order Item No. 10](#)

[California Senate Bill No. 54 \(De León 2017-2018 Reg. Sess. 2016\)](#)

[California Assembly Bill No. 450 \(Chiu 2017-2018 Reg. Sess.\)](#)

[Sample Judicial vs. ICE Administrative Warrants](#)

[ICE Sensitive Locations Policy, October 24, 2011](#)

[U.S. Customs and Border Protection Sensitive Locations Policy, January 18, 2013](#)

[October 19, 2017 CEO Memo](#)

[October 17, 2017 Board Order Item No. 24](#)

[April 11, 2017 Board Order Item No. 10](#)

POLICY AND PROCEDURES

Background:

The County of Los Angeles (County) is committed to the well-being of all its residents, irrespective of their immigration status, and to serving its diverse community in an inclusive, safe, and secure environment. The County also has a strong interest in promoting safe and unimpeded access to County offices and agencies for all residents and seeks to foster a relationship of trust between the County's immigrant community and County agencies. Immigration enforcement activities in County offices and agencies can create fear, anxiety, and concern in County residents and employees, and which can ~~severely~~ disrupt the provision of County services and unimpeded access to all County residents.

The County has an interest in protecting its resources and personnel from being forced to undertake costly federal enforcement efforts, in violation of the Tenth Amendment; an interest in protecting its private spaces from unwarranted intrusion, in violation of the Fourth Amendment; and an interest in following applicable state law. The County does not at all seek to obstruct or impede lawful federal immigration enforcement efforts. Its interest instead is to ensure that federal immigration enforcement efforts are carried out by federal immigration officers, rather than by County officials and employees, in areas that those federal immigration officers are lawfully permitted to access.

For these reasons, the County has a strong interest in ensuring that its employees are trained and equipped to provide services safely and efficiently to all of its residents without unnecessary or unwarranted disruptions, as well as to understand under what circumstances to allow access to federal immigration enforcement officials. Thus, to preserve the County's ability to administer its offices, agencies, hospitals, and departments, promote access to government programs and services, and protect, where appropriate, the privacy rights and interests of all County residents, the Los Angeles County Board of Supervisors promulgates this Policy and Procedures ("Policy").

Policy:

All County properties are designated as Sensitive Locations, as defined below. At these Sensitive Locations, while County officials and employees may not obstruct or block federal immigration enforcement efforts, no one federal immigration officials may shall not use County resources—such as personnel, funds, or property—for activities related to the federal government's immigration enforcement or immigration investigation efforts, except for law enforcement engaged in a legitimate law enforcement purpose primarily unrelated to federal civil immigration law (e.g., a joint law enforcement task force), in response to a Judicial Warrant (as defined below), or as otherwise provided herein.

~~Moreover, all immigration enforcement or immigration investigative activities are prohibited in Sensitive Locations to the extent permissible by law. County officials and employees shall not comply with consent to any request by a law enforcement officer an immigration enforcement agent to enter any to access a non-Public Area (as defined below) within a Sensitive Location for purposes of immigration enforcement or immigration investigation, unless the request is accompanied by a Judicial Warrant, as defined below.~~

Additionally, County officials and employees should not attempt to physically block or stop immigration enforcement officials from entering a non-Public Area of a Sensitive Location. Instead, County officials and employees shall direct any individual whose actions in a Sensitive Location are impeding County activities or services, or disrupting County operations, to stop any such activity or leave

the premises, unless the individual is a federal, State, or local officer authorized to engage in such activity by a Judicial Warrant,~~as defined below.~~

The preceding requirements do not apply in the event of an exigent public safety emergency or when access is required by federal, State, or local law.

Nothing in this Policy restricts or prohibits County officials or employees from complying with, and all County officials and employees must comply with, Sections 1324, 1373, and 1644 of Title 8 or Sections 1503, 1505, or 1512 of Title 18 of the United States Code or any other federal, State, or local law.

Nothing in this Policy shall restrict County departments or personnel from sharing immigration status information with immigration enforcement. 8 U.S.C. § 1373. Notably, while 8 U.S.C. § 1373 prohibits restrictions on the sharing of immigration status information, it does not require the sharing of such information.

~~The preceding requirements do not apply in the event of a public safety emergency or when access is required by federal, State, or local law.~~

This Policy is intended only to provide general guidance to the County, its departments, agencies, or entities, its officers, employees, or agents and is not intended to, does not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the County, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Definitions:

1. **Sensitive Location** – All County property, including but not limited to, facilities owned, controlled, or leased by County agencies, departments, commissions, and hospitals, but not any of the County jail facilities, which includes any facility in which individuals are detained or held in custody by the Los Angeles County Sheriff's Department.¹
2. **Public Area** – Any area within a Sensitive Location that is accessible to the general public without special permission, such as lobbies and reception areas, hallways open to the general public, public parking lots and sidewalks, and similar areas.
3. **Subpoena** – A document issued by a government agency seeking records, documents, or evidence.
4. **Warrant:**
 - a. **Judicial Warrant** – A type of authorization issued by a federal judge or other judicial official that gives authority to perform a specific act, for example, to conduct a search or arrest a person. This type of warrant would be based on

¹ See Government Code section 26605, which grants sheriffs sole and exclusive authority over such facilities ("the sheriff shall . . . be the sole and exclusive authority to keep the county jail and the prisoners in it . . .").

probable cause for a violation of federal immigration law and state that it was issued by a "District Court Judge," "Magistrate Judge," or the "United States District Court." (See attached sample).

- b. **Administrative Warrant** – A type of authorization issued by an **administrative** official—which may include an immigration judge or Immigration and Customs Enforcement Field Office Director—that gives authority to perform a specific act, for example, to arrest an individual. This warrant may state that it was issued by an "immigration judge," "administrative law judge," or "immigration officer." (See attached sample.)

Procedures:

The following procedures provide information on different types of inquiries that could occur, and appropriate responses. County departments and agencies are directed to examine their respective policies, in consultation with County Counsel, to determine whether additional guidance is necessary.

Inquiries regarding this Policy may be directed to the Office of County Counsel at 213-787-0696 or immigration@counsel.lacounty.gov. More information is available at the Los Angeles County Office of Immigrant Affairs website, located at: <http://oia.lacounty.gov>.

1. Law Enforcement Officer Without A Warrant

If contacted at a Sensitive Location by an immigration enforcement officer or agent, ~~law enforcement officer for an immigration enforcement or immigration investigative activity~~, County employees shall immediately refer the officer to the highest level manager in the facility, ~~and ask the officer to wait for his or her arrival, and notify the Office of County Counsel.~~ If the officer does not present a warrant, County employees and/or the manager:

- Shall ~~not comply with any request for~~ provide consent for the officer to access to a non-Public Area within a Sensitive Location.
- Shall provide the officer with a copy of this Policy.
- Are *not* required to answer the officer's questions.
- Are *not* required to speak with the officer at all.
- May tell the officer that they choose not to speak with him or her, and then say nothing else.
- ~~Must immediately notify the Office of County Counsel.~~

○ If the officer still seeks entry into a non-Public Area without a warrant, the employee or manager should request the name and badge/ID number of the officer and purpose of the visit and ask the officer to wait outside the area until the employee or manager, ~~can consult with his or her manager and the Office of County Counsel can consult.~~ If the officer refuses to wait, and attempts to enter

the non-Public Area, the employee or manager should make clear his or her objection to the officer's conduct but **should not attempt physically to prevent entry**. The employee should document the incident and send the documentation to immediately inform the highest level manager in the facility and the Office of County Counsel.

2. Law Enforcement Officer With A Warrant (Judicial or Administrative)

~~If a law enforcement officer~~ an immigration enforcement officer or agent asks to access a non-Public Area within a Sensitive Location or gain access to County records for an immigration enforcement or immigration investigative activity, County employees shall immediately refer the officer to the highest level manager in the facility, and ask the officer to wait for his or her arrival, and notify the Office of County Counsel. If the officer presents a warrant, County employees and/or the manager must also:

- Request and review a copy of the warrant.
- Provide the officer presenting the warrant with a copy of this Policy.
- ~~Immediately notify the Office of County Counsel and p~~Provide a copy of the warrant.

The employee or manager should request the name and badge/ID number of the officer and ask the officer to wait outside the area until the employee, manager, and County Counsel can consult. ~~○ If the officer insists on entering the area without waiting for the employee to consult with the manager and the Office of County Counsel~~ refuses to wait, tries to enter the non-Public Area without showing a copy of the warrant or talking with County Counsel, or otherwise fails to follow the above requests, the employee or manager should make clear his or her objection to the officer's conduct but **should not attempt physically to prevent entry**. The employee should document the incident and send the documentation to immediately inform the highest level manager in the facility and the Office of County Counsel.

- ~~The Office of County Counsel will provide guidance, if necessary, on the type of warrant that is involved and the appropriate response.~~

Judicial Warrant

(see attached)

⇒ If County Counsel advises that the warrant is a Judicial Warrant, the County employees and/or the manager must:

- a. Comply with the terms of the warrant.
- b. ~~Accompany~~Attempt to accompany the officer and notify the officer that: (i) he or she may gain access only to the places specifically described in the warrant, and (ii) he or she may search only for an amount of time reasonably necessary to execute the search or arrest described in the warrant.

Administrative Warrant

(see attached)

⇒ If County Counsel advises that the warrant is an Administrative Warrant, the County employees and/or the manager must:
a. Inform the officer that they are not authorized to grant consent to the officer's access to the non-Public Area.

b. ~~Provide the officer with a copy of this Policy.~~

3. Access To A Public Area

~~If an immigration enforcement officer or agent~~ ~~a law enforcement officer~~ attempts to access a Public Area within a Sensitive Location ~~for an immigration enforcement or immigration investigative purpose:~~

- The officer has the same right to occupy a Public Area as any other member of the general public.
- The officer may be directed to leave only if his or her presence impedes County activities or services, or disrupts County operations. An immigration enforcement officer's mere presence in a Public Area is unlikely, on its own, to impede County activities or services, or disrupt County operations.
- If a County employee believes that an immigration enforcement officer is impeding County activities or services, or disrupting County operations, when that officer is present in a Public Area, the employee should immediately notify the highest level manager in the facility and the Office of County Counsel.
- Before directing an officer to leave because they are impeding County activities or services, or disrupting County operations, the employee and manager should consult with County Counsel to determine if the officer's conduct rises to a level warranting removal.
- If, after consultation with County Counsel, the immigration enforcement officer is directed to leave, the County employee should provide the officer with a copy of this Policy.

4. Law Enforcement Officer With A Subpoena

~~If an immigration enforcement officer or agent~~ ~~a law enforcement officer~~ presents a County employee with a subpoena seeking ~~immigration-related~~ records, documents, or information:

- The County employee is **not required to comply with the subpoena at that moment**. Instead, the employee must immediately notify the highest level manager in the facility to report the situation and provide a copy of the subpoena to the manager. The manager must then immediately notify the Office of County Counsel and provide a copy of the subpoena to County Counsel.

- The County employee and/or the manager must provide the officer presenting the subpoena with a copy of this Policy.
- The Office of County Counsel will advise on next steps, as appropriate, to comply with the subpoena.

County employees may share information prepared by the County's Office of Immigrant Affairs (OIA) with any member of the public and with any law enforcement officer.

RESPONSIBLE DEPARTMENT

Chief Executive Office
County Counsel

DATE ISSUED/SUNSET DATE

Issue Date: October 17, 2017
Review Date: August 18, 2021
Review Date: August 12, 2025

Sunset Review Date: October 17, 2021
Sunset Review Date: October 17, 2025
Sunset Review Date: October 17, 2029

Sample Judicial vs. ICE Administrative Warrants

AO 93 (Rev. 11/13) Search and Seizure Warrant

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT for the

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

)
) Case No.
)
)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government
of the following person or property located in the _____ District of _____
(Identify the person or describe the property to be searched and give its location):

UNITED STATES DISTRICT COURT for the

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

)
) Case No.
)
)
)

SEARCH AND SEIZURE WARRANT

Issued by a District Court

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

ACCEPT

YOU ARE COMMANDED to execute this warrant on or before _____ (not to exceed 14 days) _____
_____ day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to _____
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
property, will be searched or seized (check the appropriate box)

☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____

Date and time issued: _____

Judge's signature

City and state: _____

Printed name and title

Signed by a Judge

Judge's signature

Printed name and title

DEPARTMENT OF HOMELAND SECURITY U.S. Immigration and Customs Enforcement WARRANT OF REMOVAL/DEPORTATION

File No: _____

Date: _____

To any immigration officer of the United States Department of Homeland Security:

(Full name of alien)

who entered the United States at _____ on _____
(Place of entry) (Date of entry)

is subject to removal/deportation from the United States, based upon a final order by:

- ☐ an immigration judge in exclusion, deportation, or removal proceedings
☐ a designated official
☐ the Board of Immigration Appeals
☐ a United States District or Magistrate Court Judge

and pursuant to the following provisions of the Immigration and Nationality Act:

I, the undersigned officer of the United States, by virtue of the power and authority vested in the Secretary of Homeland
Security under the laws of the United States and by his or her direction, command you to take into custody and remove
from the United States the above-named alien, pursuant to law, at the expense of _____

(Signature of immigration officer)

(Title of immigration officer)

(Date and office location)

REJECT

DEPARTMENT OF HOMELAND SECURITY U.S. Immigration and Customs Enforcement WARRANT OF REMOVAL/DEPORTATION

Issued by Homeland Security

Signed by an "Immigration Officer"

(Signature of immigration officer)

(Title of immigration officer)

(Date and office location)