

EXHIBIT A

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Pedro VASQUEZ PERDOMO; Carlos
Alexander OSORTO; and Isaac
VILLEGAS MOLINA; Jorge
HERNANDEZ VIRAMONTES; Jason
Brian GAVIDIA; LOS ANGELES
WORKER CENTER NETWORK;
UNITED FARM WORKERS;
COALITION FOR HUMANE
IMMIGRANT RIGHTS; IMMIGRANT
DEFENDERS LAW CENTER,

Plaintiffs,

vs.

Kristi NOEM, in her official capacity as
Secretary, Department of Homeland
Security; Todd M. LYONS, in his official
capacity as Acting Director, U.S.
Immigration and Customs Enforcement;
Rodney S. SCOTT, in his official capacity
as Commissioner, U.S. Customs and
Border Patrol; Michael W. BANKS, in his
official capacity as Chief of U.S. Border
Patrol; Kash PATEL, in his official
capacity as Director, Federal Bureau of
Investigation; Pam BONDI, in her official
capacity as U.S. Attorney General;
Ernesto SANTACRUZ JR., in his official
capacity as Acting Field Office Director
for Los Angeles, U.S. Immigration and
Customs Enforcement; Eddy WANG,
Special Agent in Charge for Los Angeles,
Homeland Security Investigations, U.S.
Immigration and Customs Enforcement;
Gregory K. BOVINO, in his official
capacity as Chief Patrol Agent for El
Centro Sector of the U.S. Border Patrol;
Jeffrey D. STALNAKER, in his official
capacity as Acting Chief Patrol Agent,
San Diego Sector of the U.S. Border
Patrol; Akil DAVIS, in his official
capacity as Assistant Director in Charge,
Los Angeles Office, Federal Bureau of
Investigation; Bilal A. ESSAYLI, in his
official capacity as U.S. Attorney for the
Central District of California,

Defendants.

Case No. 2:25-cv-05605-MEMF-SP

**COMPLAINT IN INTERVENTION
FOR DECLARATORY AND
INJUNCTIVE RELIEF OF
PROPOSED INTERVENORS THE
CITY OF LOS ANGELES, THE
COUNTY OF LOS ANGELES, THE
CITY OF CULVER CITY, THE
CITY OF MONTEBELLO, THE
CITY OF MONTEREY PARK, THE
CITY OF PASADENA, THE CITY
OF PICO RIVERA, THE CITY OF
SANTA MONICA, AND THE CITY
OF WEST HOLLYWOOD**

Judge: Hon. Maame Ewusi-Mensah
Frimpong

INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 24(b), Plaintiffs-Intervenors (“Intervenors”) the City of Los Angeles, the County of Los Angeles, the City of Culver City, the City of Montebello, the City of Monterey Park, the City of Pasadena, the City of Pico Rivera, the City of Santa Monica, and the City of West Hollywood allege as follows:

1. Since at least June 6, 2025, armed and masked individuals, often without visible credentials or other identification, have conducted unprecedented, illegal, and unconstitutional searches and seizures across the Los Angeles region.

2. For more than seventy years prior to June 6, immigration enforcement in the Los Angeles area consisted of lawful arrests pursuant to warrants, naming identified individuals for specified reasons, and created little or no impact on public safety and order. In the month since June 6, it has become clear that Defendants have tossed all of that history, and the basic notion of constitutional rights and adherence to law, into the trash bin.

3. These illegal seizures and related activities are conducted by federal agents, purportedly in support of the federal government’s immigration-enforcement goals. Yet these sweeping raids are conducted without warrants, without probable cause, and without reasonable suspicion. Witnesses report that many of the resulting arrests appear to be based on nothing more than the perceived ethnicity of the detained individuals.

4. Community leaders who have witnessed Defendants’ operations have described them as “kidnapp[ings]” and “disappear[ances]” evocative of “a totalitarian regime.”¹ Once launched, these actions employ disproportionate levels of force and escalation tactics unwarranted by the threat levels presented.

¹ Martin Kaste, *As courts review military in LA, immigration enforcement accelerates*, NPR (June 19, 2025), <https://www.npr.org/2025/06/19/g-s1-73569/as-courts-review-military-in-l-a-immigration-enforcement-accelerates>.

1 5. These unlawful activities have included random and often brutal stops,
2 raids, roundups, family separations, and detention without access to counsel or
3 family.

4 6. The daily onslaught of armed, unidentified, often masked, and openly
5 hostile forces appearing at workplaces, schools, courthouses, churches, parks,
6 homes, baseball games, neighborhoods, and other public and private places where
7 families and other residents live, work, worship and recreate has reverberated across
8 the region. This has left many of Intervenor's residents, regardless of immigration
9 status, frightened to go to work, shop, visit, recreate, pray, study, seek Intervenor's
10 services, or even venture outside or engage in normal daily activity.

11 7. There is good reason for such fear. Defendants' choice to appear on
12 city streets or in other public spaces in force, visibly armed, in masks and driving
13 unmarked vehicles, radically increases the chance of violent encounters, whether
14 with frightened residents, including citizens, or local law enforcement called to the
15 scene. Some of the detentions have ensnared citizens and legal residents. Even
16 federal actions that have *not* ended with arrest or detention have resulted in physical
17 harm to citizens from tear gas, physical force and battery.

18 8. These illegal federal actions have caused tangible and intangible
19 damage and harm to Intervenor's in multiple ways, sowing chaos, fear, and mistrust
20 in their communities.

21 9. The unlawful actions have diverted law enforcement resources away
22 from enforcing local laws and promoting public safety. Local law enforcement
23 agencies are forced to respond to numerous reports of armed, masked individuals
24 converging on an area. This diverts scarce policing resources that ought to be
25 deployed to reduce the incidence and fear of crime.

26 10. Not only have these raids been conducted by masked and unidentified
27 individuals, but Defendants have also broken with decades of precedent to launch
28 these raids without notice to, or coordination with, local law enforcement. As a

1 result, in many cases, law enforcement officers must respond without any idea
2 whether the armed individuals are federal agents or individuals committing crimes,
3 putting local officers at increased risk.

4 11. The primary goal of Defendants' campaign is not immigration
5 enforcement. Defendants have been crystal clear that they seek to make an example
6 of Intervenor[s] for implementing policies that President Donald J. Trump dislikes.
7 The President announced on his social media platform, Truth Social, that he was
8 calling on federal immigration officials "to do all in their power" to effect "the
9 single largest Mass Deportation Program in History" in "Democratic Power
10 Center[s]" "such as Los Angeles."² As Secretary of Homeland Security Kristi
11 Noem put it: "We are not going away. We are staying here to liberate this city from
12 the socialist and burdensome leadership that this Governor Newsom and this mayor
13 placed on this country and what they have tried to insert into this city."³

14 12. Beyond the direct impacts on local law enforcement, the illegal
15 activities of federal immigration authorities have broadly harmed Intervenor[s]
16 economies and financial health. Local businesses in each of the Intervenor[s]
17 jurisdictions have been devastated because their employees and their customers are
18 afraid to leave their homes. Intervenor[s] have lost and are continuing to lose
19 meaningful tax revenue, in addition to bearing the increased costs resulting from the
20 increased demands on local law enforcement. Intervenor[s] have also incurred tens of
21 millions of dollars in direct, additional costs, including overtime and other
22 unanticipated expenses resulting from these unlawful federal activities.

23 ² Camilo Montoya-Galvez, *Trump directs immigration authorities to prioritize*
24 *deportations in Democratic-run cities*, CBS News (June 16, 2025),
25 [https://www.cbsnews.com/news/trump-directs-ice-deportations-democratic-run-](https://www.cbsnews.com/news/trump-directs-ice-deportations-democratic-run-cities)
[cities](https://www.cbsnews.com/news/trump-directs-ice-deportations-democratic-run-cities).

26 ³ Helen Jeong, *Kristi Noem blames Democratic officials for making ICE raids in LA*
27 *harder*, NBC Los Angeles (June 12, 2025),
28 [https://www.nbclosangeles.com/news/local/kristi-noem-blames-democratic-](https://www.nbclosangeles.com/news/local/kristi-noem-blames-democratic-officials-for-making-ice-raids-in-la-harder/3722800)
[officials-for-making-ice-raids-in-la-harder/3722800](https://www.nbclosangeles.com/news/local/kristi-noem-blames-democratic-officials-for-making-ice-raids-in-la-harder/3722800).

PARTIES IN INTERVENTION

18. Allegations regarding the parties in Plaintiffs’ First Amended Petition and Complaint (the “Lead Complaint”), ECF No. 16, ¶¶ 12–32, are incorporated herein by reference.

Proposed Intervenor-Plaintiff the City of Los Angeles

19. Proposed Intervenor-Plaintiff the City of Los Angeles is a municipal corporation organized and existing under the laws of the State of California and is a charter city pursuant to Article XI of the California Constitution.

20. The principal law enforcement agency of the City of Los Angeles is the Los Angeles Police Department (“LAPD”). The mission of the LAPD is to safeguard the lives and property of the people it serves, to reduce the incidence and fear of crime, and to enhance public safety while working with the diverse communities of Los Angeles to improve Angelenos’ quality of life. LAPD works in partnership with the people and organizations within Los Angeles to solve local problems that affect public safety.

21. Historically, LAPD has received notice of large-scale, federal immigration enforcement efforts.

22. Defendants launched the current immigration raids without notice to, or coordination with, the LAPD.

23. As a result, LAPD officers have experienced confusion as to whether an individual conducting a raid is, in fact, a federal agent.

24. LAPD has had to divert resources to responding to and managing the fallout from federal enforcement efforts. Since June 6, 2025, LAPD has devoted more than 10,000 personnel (measured in days of deployment) and has spent more than \$27.8 million in total costs in responding to and managing the fallout from Defendants’ actions, including in receiving and responding to numerous 911 calls or other reports about federal raids or other reports of “crimes” that turned out to be federal immigration enforcement actions.

1 25. The relationships that LAPD has built with Angeleno communities,
2 including immigrant communities, have been and continue to be harmed by
3 Defendants' unlawful enforcement actions. LAPD officers have been confused for
4 federal agents, and accused by Angelenos of aiding federal agents. Victims of
5 crimes are hesitant to speak to local law enforcement investigators due to fears that
6 investigators knocking on their doors may actually be federal agents.

7 26. The warrantless arrests of individuals in Los Angeles, including in and
8 around courthouses, interferes with Los Angeles' ability to protect and to obtain
9 cooperation from its immigrant communities. For example, victims of crimes have
10 reported being afraid to come to court or otherwise cooperate with law enforcement
11 due to concerns about federal immigration enforcement.

12 27. Defendants' actions have also chilled economic activity in Los
13 Angeles. Ridership for DASH, Los Angeles' public bus service, has declined across
14 the City, with downtown DASH ridership for June 2025 down 35% from the prior
15 year. Restaurants and retail businesses have emptied out. Owners report declines in
16 sales and employees who are not showing up for work. Some businesses are
17 reporting up to 75% declines in foot traffic and sales. Los Angeles has lost both
18 sales and business tax income as a consequence.

19 **Proposed Intervenor-Plaintiff the County of Los Angeles**

20 28. Los Angeles County is a subdivision of the State of California, and one
21 of its original 27 counties, ratified under the first County Charter in 1912. It has the
22 largest population of any county in the United States at over 10 million residents—
23 who comprise more than one quarter of California's population—and is the nation's
24 largest county government, with more residents than most states. The County
25 covers 4,084 square miles, and more than one million residents live in
26 unincorporated areas outside of the County's eighty-eight cities. Close to 49% of
27 County residents are of Hispanic or Latino origin, with another 16.4% of Asian,
28 Native Hawaiian, or Pacific Islander origin, 9% Black, and 25.3% of White or Non-

1 Hispanic origin. As of February 2025, the County budget exceeds \$49 billion in
2 federal, state, and local funds to support a range of vital commitments including, but
3 not limited to, healthcare, public safety, public benefits, workforce development,
4 foster care, child support, housing and emergency management.

5 29. Since June 7, 2025, federal immigration agents have conducted large-
6 scale and frequent raids across the County in public parks and streets, hospitals,
7 private homes, businesses, swap meets, parking lots, and in front of courthouses,
8 among a multitude of other locations that impact virtually every facet of life for
9 County residents.

10 30. Video footage and eyewitness accounts of these raids reveal that
11 federal immigration agents typically have not shown judicial, or even
12 administrative, warrants when conducting their operations. Some of the individuals
13 detained, questioned, and arrested in these operations are U.S. citizens or hold valid
14 immigration status; federal agents presumably did not have reasonable suspicion or
15 probable cause to suspect immigration violations in at least these cases, and perhaps
16 even in many cases of those without legal status. One such encounter, which was
17 shared in social media, included an ICE agent repeatedly asking a twenty-nine-year-
18 old Hispanic man, who is a U.S. citizen: “What hospital were you born at?” while
19 temporarily detaining him.

20 31. Video footage and eyewitness accounts also indicate that federal
21 immigration agents often wear masks and plainclothes and do not identify
22 themselves during these raids, heightening fear and tension among County residents
23 who are investigated or detained, as well as bystanders and others who learn of these
24 raids through the media accounts, word of mouth, and social media posts.

25 32. The vast majority of County residents targeted by these raids are of
26 Hispanic or Latino origin, followed by members of the Asian and Pacific Islander
27 communities.

1 33. As a result of the federal immigration raids, large numbers of Latino
2 and other residents have become fearful of leaving their homes to go to work, take
3 public transportation, access County services including medical services, access
4 open public programs and resources, and even attend appointments with
5 immigration lawyers and legal service providers funded by the County.

6 34. The masked, unidentified federal agents have created such a climate of
7 fear, mistrust, and suspicion that County employees ranging from Los Angeles
8 County Sheriff's Department's deputies to social workers have been mistaken for
9 federal agents and confronted with vandalism of their vehicles, verbal accusations,
10 harassment, and threats, as well as non-cooperation.

11 35. This confusion and mistrust also impacts public safety because victims
12 and witnesses are unwilling to cooperate with Sheriff's deputies. In addition, due to
13 its expanded duties resulting from the public outcry against the large-scale federal
14 immigration raids, the Sheriff's Department has incurred over \$9 million in
15 additional costs since Defendants' immigration raids began in June.

16 36. Public fear of federal immigration agents also has disrupted the work of
17 social workers in the County's Department of Children and Family Services
18 ("DCFS") and Department of Aging & Disabilities, preventing them from protecting
19 the County's most vulnerable residents: children and elders. As one example, DCFS
20 operates a Multi-Agency Response Team ("MART") that helps provide emergency
21 protective services to children in imminent danger from illegal gangs, guns, and
22 drugs. In cooperation with local law enforcement, MART protects children in
23 "intelligence sensitive" child endangerment cases. On June 16, 2025, the Sheriff's
24 Department requested MART's presence in executing a warrant. During the
25 execution of the warrant, a crowd gathered and shouted profanities at the DCFS
26 MART social worker, making statements showing that they believed DCFS workers
27 were, or were helping, federal immigration enforcement agents. Despite the social
28 worker's showing a DCFS identification card, several individuals in the crowd

1 continued to mistakenly believe that MART staff were associated with federal
2 immigration authorities. Following those events, to reduce the risk to DCFS staff,
3 DCFS altered its procedures and began instructing its staff to meet law enforcement
4 at their precincts, instead of meeting them in the community.

5 37. These fears pose significant personal and public health risks, with the
6 no-show rate across the County's health systems increasing to approximately 20%
7 from 18% since June 8, 2025. As a result, low-level health problems may become
8 severe if left untreated, with individuals, families, and their wider communities
9 ultimately paying the price. Not only do such widespread negative health
10 consequences threaten all of us, but they strain a health care safety net already under
11 threat.

12 38. The federal immigration raids' disregard for probable cause, reasonable
13 suspicion, and warrant requirements have also had a chilling effect on the economic
14 life of the County, similar to the impact of the COVID-19 shutdown in 2020, and
15 have affected County tax revenues accordingly.⁴

16 39. Immigration raids in Los Angeles County have occurred at a clothing
17 wholesaler where individuals were shopping, at a taco stand, and on County streets.
18 Many immigration raids have been recorded and shared on social media,
19 heightening the fear in Latino communities in particular of participating in regular
20 day-to-day activities.⁵ As a result, food vendors, retailers, and even historic
21 landmarks and tourist sites have seen decreases in business. Some residents no
22 longer shop at corner stores and stay holed up in their homes. In addition to the
23 public safety, public health, and economic impacts, civic life and activities
24 throughout the County have also been diminished as a result of the raids. Because

25 _____
26 ⁴ Jesus Jiménez et al., *'Completely Disrupted': Fear Upends Life for Latinos in L.A.*,
27 N.Y. Times (June 30, 2025), <https://www.nytimes.com/2025/06/30/us/latinos-los-angeles-immigration.html>.

28 ⁵ *Id.*

1 of the pervasive fear and insecurity the raids have engendered, the County's
2 Department of Parks and Recreation has had to cancel multiple concerts and events,
3 including its Fourth of July celebration.

4 **Proposed Intervenor-Plaintiff the City of Culver City**

5 40. Proposed Intervenor-Plaintiff the City of Culver City is a municipal
6 corporation organized and existing under the laws of the State of California and is a
7 charter city pursuant to Article XI of the California Constitution.

8 41. Federal immigration raids have occurred throughout Culver City since
9 late May 2025, including at Culver City Express Hand Car Wash⁶ and on Culver
10 City's streets by masked individuals who lack arrest warrants.⁷

11 42. As a direct result of federal agents using unmarked vehicles, masks,
12 tactical gear, and personnel without visible identification or federal markings,
13 Culver City has been forced to divert resources to address community safety
14 concerns. For example, the Culver City Police Department now must monitor any
15 suspected federal enforcement activity in the City and, when possible, confirm the
16 identity and legitimacy of individuals claiming to act as federal agents.

17 43. Culver City businesses have experienced significant negative economic
18 impacts due to federal immigration enforcement activities. For example, the week
19 of June 23, 2025 was the first week in 2025 where visits to the Culver City
20 Westfield Mall were down all seven days of the week, across all hours of the day.
21 The Westfield Mall generates a significant portion of Culver City's retail sales tax
22 revenue.

23 ⁶ Suhauna Hussain, *"They are grabbing people." LA and Orange County car wash*
24 *workers targeted by federal immigration raids*, L.A. Times (June 11, 2025)
25 <https://www.latimes.com/business/story/2025-06-11/l-a-orange-county-car-washes-hit-by-ice-raids>.

26 ⁷ Vivian Chow, *Community outraged after ice cream vendor detained by*
27 *immigration agents in Culver City*, KTLA News (June 25, 2025).
28 <https://ktla.com/news/local-news/community-outraged-after-ice-cream-vendor-detained-by-immigration-agents-in-culver-city/>.

Proposed Intervenor-Plaintiff the City of Montebello

44. Proposed Intervenor-Plaintiff the City of Montebello is a municipal corporation, duly organized and existing as a general law city under the laws of the State of California, and located in the County of Los Angeles. It has a population of approximately 60,015 residents. Over 78% of the city's population is Latino.

45. Unlawful immigration enforcement activities have occurred at numerous locations throughout Montebello. Of note is the violent and unjustified arrest of a U.S. citizen on June 13, 2025, at his tow truck place of employment in Montebello.

46. There have been numerous federal immigration actions throughout Montebello at various commercial and residential locations within the city. Businesses are shutting down because of these federal immigration activities. Protests of the federal immigration activities have occurred, which have impacted both businesses and Montebello Police Department resources.

47. Montebello maintains its own Police Department for law enforcement services. Montebello is responsible for costs associated with the Montebello Police Department's services and law enforcement activities. The recent events and federal immigration actions throughout Montebello have caused a significant diversion of public safety resources to address the resulting protests.

48. Montebello's relationship with its community has suffered because of the unlawful immigration enforcement activity. Montebello Police Department officers have been erroneously accused on social media of cooperating with federal agents, thus eroding trust in the Department. Staff resources, including the Montebello Police Chief and City Manager, as well as other Montebello city staff and personnel, have been diverted to develop and promote material that presents facts and eases community fears.

49. Following unlawful immigration activities throughout the region, fearful residents have held protests and appeared at Montebello City Council

1 meetings to share their sincere fears for the safety of the immigrant community in
2 Montebello. These events required Montebello officers to be diverted from their
3 normal assignments to provide protection and general community safety.

4 50. Montebello prides itself on providing a range of first-class recreational,
5 social, and civic resources to its residents. These include, among other things, a
6 senior center, youth programs, and other community events. Since the recent
7 federal immigration actions, participation in Montebello events has decreased,
8 including at the annual City-sponsored Independence Day celebration and concerts
9 in the park activities. On information and belief, the drop in attendance at these
10 Montebello events is attributable to fears of unlawful immigration enforcement
11 activity at these public locations.

12 51. In an effort to counter the harm caused by the unlawful immigration
13 enforcement activities, Montebello's City Council has publicly condemned the
14 activity by way of a resolution and is using City funds to create a humanitarian
15 assistance program for immigrants within the Montebello community.

16 52. Defendants' federal immigration enforcement has spread fear,
17 confusion, and distress across the Montebello community. Montebello residents,
18 even those that have lived in the city for decades, feel unsafe going outside to
19 engage in everyday activities, such as commuting to work, taking their children to
20 school, and attending community events due to concerns that they could be
21 arbitrarily confronted and assaulted by federal agents.

22 53. In addition to harming Montebello residents, the federal immigration
23 enforcement inflicts concrete and particularized injury to Montebello as a municipal
24 entity, including injury to the operations of its police department, management of its
25 community programs, and production of its tax revenue.

26 54. Defendants' federal immigration enforcement has forced Montebello to
27 divert its limited police resources to address public safety issues that would not have
28 arisen absent these unlawful enforcement practices.

1 55. Montebello depends on local taxes to fund its municipal operations.
2 The unlawful federal immigration enforcement has produced chilling effects on
3 Montebello businesses, causing declines in businesses' sales and tax revenues to the
4 City.

5 **Proposed Intervenor-Plaintiff the City of Monterey Park**

6 56. Proposed Intervenor-Plaintiff the City of Monterey Park is a municipal
7 corporation and general law city organized and existing under the laws of the State
8 of California. It has a population of approximately 61,096 residents. Over half of
9 the city's population, approximately 51.6%, is foreign-born. It serves as a
10 significant immigrant gateway, especially for Asian and Hispanic communities.

11 57. Monterey Park is notable for having one of the highest concentrations
12 of Asian Americans in the United States, with approximately 64-66% of the
13 population being Asian, predominantly of Chinese descent. Monterey Park also has
14 a longstanding Mexican-American community; the Latino population makes up
15 approximately 27-28% of City residents. Monterey Park is also home to historic
16 enclaves of Japanese-American, Armenian, and Jewish residents.

17 58. Federal immigration activities within the Los Angeles region have
18 cultivated a culture of fear and distrust within the Monterey Park community. On
19 July 2, 2025, community members provided public comment to the Monterey Park
20 City Council regarding their experiences with recent federal raids and inquired
21 about the City's response to immigrant rights and protection.

22 59. Multiple speakers expressed fear among immigrant communities due to
23 reports of masked, unidentified individuals (allegedly federal agents or vigilantes)
24 detaining people without due process. The speakers' shared personal and family
25 experiences highlighted the fear and anxiety within the community relating to
26 federal agents' racial profiling and abductions, and underscored the perceived need
27 to keep documentation on hand at all times to prove legal status. Their emotional
28

1 testimony underscored the psychological toll on the residents of Monterey Park,
2 including U.S. citizens mistaken for undocumented immigrants.

3 60. Residents requested clear communication and proactive measures from
4 the Monterey Park Police Department to verify the identity of enforcement agents
5 and ensure public safety.

6 61. In response to community member concerns, Monterey Park has
7 expended public resources to provide information to residents including “Know
8 Your Rights” cards available in multiple languages at community centers, the
9 library, and online. It has ongoing efforts to expand outreach and make information
10 more accessible at public events and locations, develop clear protocols for local
11 police involvement during federal immigration activities, and provide assurances
12 that local law enforcement stands with and protects all residents, regardless of
13 immigration status.

14 62. The fear resulting from the unlawful federal immigration activity has
15 also harmed local law enforcement efforts. For example, while executing inspection
16 warrants in June 2025, the Monterey Park Police Department and Monterey Park
17 Fire Department were erroneously identified as federal immigration agents on social
18 media despite Monterey Park’s extra efforts to inform residents regarding the
19 legitimate law enforcement activities occurring at the site.

20 63. Fostering a relationship of trust, respect, and open communication
21 between Monterey Park officials and residents is essential to the City’s mission of
22 delivering efficient public services in partnership with the community, ensuring
23 public safety, and promoting a prosperous economic environment, opportunities for
24 Monterey Park’s youth, and a high quality of life.

25 64. The federal government’s activities are interfering with Monterey
26 Park’s crucial role in protecting the public health, safety, and well-being of its
27 residents. Such activity is also resulting in the unnecessary expenditure of public
28 resources.

Proposed Intervenor-Plaintiff the City of Pasadena

65. Proposed Intervenor-Plaintiff the City of Pasadena is a municipal corporation organized and existing under the laws of the State of California and is a charter city pursuant to Article XI of the California Constitution. Pasadena alleges the following facts relating to federal immigration activity within Pasadena upon information and belief.

66. In recent weeks, Pasadena has experienced an unprecedented increase in unlawful federal immigration enforcement activity within its jurisdictional borders.⁸ For example, Pasadena residents Pedro Vasquez Perdomo, Carlos Alexander Osorto, and Isaac Villegas Molina (collectively, “Pasadena Resident Plaintiffs”) report that in the early morning of June 18, 2025, approximately six masked federal agents equipped with weapons jumped out of unmarked cars and arrested the Pasadena Resident Plaintiffs while they waited at a Pasadena bus stop across the street from Winchell’s Donuts to be picked up for jobs. *See* Lead Compl. ¶¶ 12–14, 111–13, 124–26, 137–39.⁹ The Pasadena Resident Plaintiffs report that federal agents made these arrests without first securing arrest warrants, making an individualized determination of risk of flight, establishing a reasonable suspicion of an immigration law violation, and identifying themselves as federal agents. *Id.* ¶¶ 114–19, 127–32, 140–44.

67. Federal agents have reportedly adhered to the same or similar improper practices on multiple other occasions when conducting enforcement activities in Pasadena. For example, plainclothes federal agents jumped out of unmarked

⁸ *See Police Chief Reiterates His Department Does Not Assist or Participate in ICE Enforcement, Urges Calm*, Pasadena Now (July 1, 2025), <https://pasadenanow.com/main/police-chief-urges-calm-reiterates-his-department-does-not-assist-or-participate-in-ice-enforcement>.

⁹ Sophie Flay, *ICE agents detain several people at Pasadena bus stop, conducts raids across the city*, ABC 7 (June 19, 2025), <https://abc7.com/post/ice-agents-detain-2-men-pasadena-bus-stop-conduct-raids-city/16785979/>.

1 vehicles and, while using excessive force, attempted to arrest a Pasadena resident in
2 front of her children outside a Pasadena apartment building on June 28, 2025,
3 prompting a 911 call to Pasadena Police about a suspected kidnapping.¹⁰ Multiple
4 Pasadena Police personnel responded to the scene to investigate, and it was
5 determined that the federal agents had mistakenly identified the Pasadena resident
6 for another individual they were seeking. Paramedics also responded to the scene
7 and medically treated the Pasadena resident due to the injuries she sustained from
8 the incident. Such action, and similar activities by Defendants as described herein,
9 is tantamount to a nuisance in Pasadena.

10 68. This federal immigration enforcement has spread fear, confusion, and
11 distress across the Pasadena community. Pasadena residents, even those who have
12 lived in the City for decades, feel unsafe going outside to engage in everyday
13 activities, such as commuting to work, taking their children to school, and attending
14 community events due to concerns that they could be arbitrarily confronted and
15 assaulted by federal agents.

16 69. In addition to harming Pasadena residents, the federal immigration
17 enforcement inflicts concrete and particularized injury to Pasadena as a municipal
18 entity, including injury to the operations of its police department, management of its
19 community programs, and production of its tax revenue.

20 70. The federal immigration enforcement has forced Pasadena to divert its
21 limited police resources to address public safety issues that would not have arisen
22 absent these enforcement practices.
23
24

25 ¹⁰ Angelique Brenes, *ICE agents detain mother in Pasadena in front of children*
26 *without showing a warrant*, KTLA 5 (June 28, 2025), [https://ktla.com/news/local-](https://ktla.com/news/local-news/ice-agents-detain-mother-in-pasadena-in-front-of-children-without-a-warrant/)
27 *news/ice-agents-detain-mother-in-pasadena-in-front-of-children-without-a-warrant/*;
28 *ICE Agents Detain Mother In Front of Her Children in Pasadena*, Pasadena Now
(June 29, 2025), [https://pasadenanow.com/main/ice-agents-detain-mother-in-front-](https://pasadenanow.com/main/ice-agents-detain-mother-in-front-of-her-children-in-pasadena)
[of-her-children-in-pasadena](https://pasadenanow.com/main/ice-agents-detain-mother-in-front-of-her-children-in-pasadena).

1 71. The federal immigration enforcement has also led to declines in public
2 participation in Pasadena's community programs such as youth summer education
3 and, in other cases, forced Pasadena to cancel swim lessons and other community
4 programs altogether due to public safety concerns.¹¹

5 72. Pasadena depends on local taxes to fund its municipal operations.
6 Federal immigration enforcement has harmed and produced chilling effects on
7 Pasadena businesses, causing declines in businesses' sales revenue and a
8 corresponding decrease in Pasadena's tax revenue.¹²

9 **Proposed Intervenor-Plaintiff the City of Pico Rivera**

10 73. Proposed Intervenor-Plaintiff the City of Pico Rivera is a municipal
11 corporation, duly organized and existing as a general law city under the laws of the
12 State of California, and located in the County of Los Angeles.

13 74. Pico Rivera is more than 90% Latino.

14 75. On information and belief, unlawful federal immigration enforcement
15 activities have occurred at numerous locations throughout Pico Rivera. Of note is
16 the violent and unjustified arrest of a U.S. citizen, Adrian Martinez, on June 17,
17 2025 at the Walmart parking lot in the City. This incident led to multiple
18 community protests, including rallies outside of Pico Rivera City Council Hall.

19 76. Federal immigration authorities have reportedly adhered to the same or
20 similar improper practices on multiple other occasions when conducting
21 enforcement activities in Pico Rivera.

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24 ¹¹ Tim Caputo, *Pasadena cancels Saturday swim lessons, other park programs after*
25 *reports of immigration enforcement*, ABC 7 (June 22, 2025),
26 <https://abc7.com/post/pasadena-cancels-saturday-swim-lessons-other-park-programs-reports-immigration-enforcement/16810001/>.

27 ¹² See Victor M. Gordo, *Pasadena Mayor: Trump's Immigration Raids Hurt*
28 *Communities Like Mine*, Time (June 18, 2025), <https://time.com/7295305/pasadena-trump-immigration-raids>.

1 77. Another significant incident occurred on June 17, 2025, at Ruben
2 Salazar High School in Pico Rivera, where video evidence was secured to
3 demonstrate what appears to federal immigration authorities trespassing upon El
4 Rancho Unified School District (“ERUSD”) property and federal personnel
5 engaging in purported public urination on ERUSD property, near locations where
6 minor children were located. The School Board of ERUSD conducted a press
7 conference where such conduct was condemned and an investigation was
8 demanded.

9 78. The unlawful federal immigration enforcement has spread fear,
10 confusion, and distress across the Pico Rivera community. Pico Rivera residents,
11 even those who have lived in the City for decades, feel unsafe going outside to
12 engage in everyday activities, such as commuting to work, taking their children to
13 school, and attending community events due to concerns that they could be
14 arbitrarily confronted and assaulted by federal agents.

15 79. Pico Rivera contracts with the Los Angeles County Sheriff’s
16 Department for law enforcement services. Pico Rivera is responsible for costs
17 associated with the Sheriff’s presence within the City. The events of June 17 caused
18 a significant diversion of resources to address the resulting protests.

19 80. Since the events of June 17, and subsequent unlawful immigration
20 activities throughout the region, fearful residents have held protests and appeared at
21 Pico Rivera City Council Hall to share their sincere fears for the safety of the
22 immigrant community in Pico Rivera. These events required Sheriff’s deputies to
23 be diverted from their normal assignments to provide protection and general
24 community safety.

25 81. Pico Rivera’s relationship with its community has suffered as a result
26 of the unlawful immigration enforcement activity. According to the Sheriff’s
27 Department, its deputies have been erroneously accused on social media of
28 cooperating with federal agents, thus eroding trust in the Department. Pico Rivera

1 has been erroneously accused of “covering up” the presence of a Department of
2 Homeland Security office within its jurisdiction. Staff resources, including its
3 Public Information Officer, Assistant City Manager, and City Manager, as well as
4 contract communications support, have been diverted to develop and promote
5 material that presents facts and eases community fears.

6 82. Pico Rivera prides itself on providing a range of first-class recreational,
7 social, and civic resources to its residents. These include, among other things, a
8 senior center, youth events, and other community events. Participation in some City
9 events has decreased since the recent events conducted by federal agents and
10 personnel. On information and belief, the drop in attendance at some Pico Rivera
11 events is attributable to fears of unlawful immigration enforcement activity at these
12 public locations.

13 83. In addition to harming Pico Rivera residents, the unlawful federal
14 immigration enforcement activity inflicts concrete and particularized injury to Pico
15 Rivera as a municipal entity, including injury to the operations of its police
16 department, management of its community programs, and production of its tax
17 revenue. The unlawful federal immigration enforcement has forced Pico Rivera to
18 divert its limited police resources to address public safety issues that would not have
19 arisen absent these enforcement practices.

20 84. Pico Rivera depends on local taxes to fund its municipal operations.
21 Federal immigration enforcement has harmed and produced chilling effects on Pico
22 Rivera businesses, causing declines in businesses’ sales revenue and a
23 corresponding decrease in Pico Rivera’s tax revenue.

24 **Proposed Intervenor-Plaintiff the City of Santa Monica**

25 85. Proposed Intervenor-Plaintiff the City of Santa Monica is a municipal
26 corporation organized and existing under the laws of the State of California and is a
27 charter city pursuant to Article XI of the California Constitution. Santa Monica
28

1 borders the City of Los Angeles and is directly affected by activities occurring there
2 and in the region.

3 86. Santa Monica is a prime destination for travel and tourism, particularly
4 international travel, with more visits usually expected during summer vacations.
5 Unlawful federal immigration activity in the region has harmed Santa Monica's
6 reputation as a tourist destination and international arrivals have decreased
7 significantly, resulting in less overall spending and lower hotel occupancy rates.

8 87. Immigrant communities staying home out of fear of a federal
9 immigration raid diminishes economic activity and participation in public events as
10 well as the overall vibrancy and appeal of Santa Monica as a tourist destination. It
11 also negatively impacts many businesses that rely on immigrant labor, including
12 hotels, restaurants, sidewalk vendors, vendors at the farmers markets, car washes,
13 and construction trades, affecting business revenue, employment, and overall
14 economic growth. Santa Monica, in turn, loses critical transient occupancy and
15 sales tax revenue it depends on.

16 88. Because many members of immigrant or mixed status households who
17 live and/or work in Santa Monica are too afraid to leave their homes to go to work,
18 Santa Monica is exploring setting up a fund to help affected households pay for
19 food, rent, and other necessities.

20 89. The Santa Monica City Attorney's Office prosecutes all misdemeanor
21 crimes that occur within the city. Victims have been more reluctant to cooperate
22 with prosecutors and have required additional staff efforts to secure appearances in
23 court. Fear of arrest by federal immigration authorities in public or at courthouses is
24 impacting the City's ability to obtain just outcomes for victims.

25 90. Santa Monica has been required to employ significant City resources to
26 prepare for federal immigration raids at City facilities, which preparation is made
27 significantly more difficult by federal immigration authorities conducting
28 unannounced activities without identification.

1 91. Community members responded to regional federal immigration raids
2 with a large-scale public demonstration in Santa Monica on June 14, which required
3 the City to deploy significantly more Santa Monica Police Department and other
4 City resources to ensure public safety. There has been at least one occurrence of
5 masked, armed, and unidentified federal immigration agents arresting a Latino
6 construction worker on 16th Street near Washington Street in Santa Monica on June
7 12. The agents appeared not to communicate with the construction worker before
8 detaining him using zip ties and placing him in an unmarked car. The City has
9 obtained a video and declaration from at least one witness describing the incident
10 and how it terrified her.

11 **Proposed Intervenor-Plaintiff the City of West Hollywood**

12 92. Proposed Intervenor-Plaintiff the City of West Hollywood is a
13 municipal corporation, duly organized and existing as a general law city under the
14 laws of the State of California, and located in the County of Los Angeles.

15 93. A federal immigration raid occurred in West Hollywood on July 4,
16 2025 at the Santa Palm Car Wash by masked individuals who reportedly lacked
17 arrest warrants.

18 94. West Hollywood businesses have experienced economic impacts due to
19 federal immigration enforcement activities. Employees are remaining at home,
20 making it difficult for businesses to operate at normal levels. There are fewer
21 people patronizing businesses, fewer vendors on the streets, and fewer employees
22 showing up to work.

23 95. West Hollywood is a hospitality destination and the local hotels report
24 to the City that visitor rates are down overall for the international market sector that
25 used to frequent West Hollywood in the summer. Defendants' policies and
26 enforcement actions have positioned the United States as an unwelcoming
27 destination for foreign guests with uncertainty and volatility. As a city with a
28 hospitality-based economy, West Hollywood has experienced a strong negative

1 impact from Defendants’ actions—not only on hotels but also on the bars,
2 restaurants, and nightclubs that visitors will often frequent when utilizing lodging
3 options in the city.

4 96. Defendants’ actions have diverted West Hollywood’s law-enforcement
5 resources. West Hollywood contracts with the Los Angeles County Sheriff’s
6 Department for law enforcement services. Defendants’ actions in early June caused
7 a significant diversion of resources to address the resulting protests in nearby cities.
8 The West Hollywood City Council was scheduled to have multiple high-ranking
9 representatives from the Los Angeles County Sheriff’s Department present at its
10 June 9, 2025 City Council meeting to discuss a public safety agenda item that was of
11 critical importance to the community. The Sheriff’s Department representatives
12 were not able to attend the City Council meeting, as the regional protests utilized all
13 available resources in the region. The City Council had to continue the item to a
14 later date when the Sheriff’s Department could provide the needed resources to
15 West Hollywood.

16 97. Defendants’ unlawful actions also caused protests against Defendants’
17 policies and immigration activities in the region in West Hollywood Park on June
18 14, 2025, where it is reported that at least 3,000 people attended. The City and
19 Sheriff’s Department had to expend significant resources to maintain safety and
20 order.

21 98. In response to community member concerns, West Hollywood has
22 expended public resources to provide information to residents including “Know
23 Your Rights” public information available at City facilities and online. It has
24 ongoing efforts to expand outreach and make information more accessible at public
25 events and locations, develop clear protocols for Sheriff’s Department involvement
26 during federal immigration-enforcement activities, and provide assurances that local
27 law enforcement stands with and protects all residents, regardless of immigration
28 status.

1 99. Defendants' activities are interfering with West Hollywood's crucial
2 role in protecting the public health, safety, and well-being of its residents. Such
3 activity is also resulting in the unnecessary expenditure of public resources.

4 **FACTUAL ALLEGATIONS**

5 100. On July 2, 2025, Plaintiffs filed the Lead Complaint challenging
6 Defendants' use of unlawful searches and seizures to terrorize residents under the
7 guise of federal immigration enforcement. *See* ECF No. 16. As set forth in detail in
8 the Lead Complaint, in recent weeks, Defendants have carried out increasingly
9 aggressive and unlawful immigration raids in communities throughout the Los
10 Angeles region. Masked federal agents who refuse to identify themselves are
11 stopping, arresting, and detaining people all over the County, seemingly based
12 solely on their apparent ethnicity, capturing citizens and noncitizens alike.
13 Defendants' actions have sparked terror throughout the region.

14 101. As described in the Lead Complaint, Defendants' indiscriminate,
15 unchecked, and wanton enforcement efforts are violating the Fourth and Fifth
16 Amendment rights of Intervenor's community members, and exceed the scope of
17 Defendants' statutory authority under the Immigration and Nationality Act, 8 U.S.C.
18 § 1357. Those same actions violate Intervenor's rights under the Tenth
19 Amendment. This Complaint in Intervention incorporates the allegations in the
20 Lead Complaint by reference and adds further allegations to describe how
21 Defendants' unlawful actions are inflicting distinct additional harm on the
22 Intervenor.

23 ***A. Defendants' Unlawful Raids Impair Intervenor's Ability to Maintain Law***
24 ***and Order***

25 102. Defendants' raids are not routine, lawful immigration enforcement
26 actions. In an unprecedented departure from longstanding practices, armed, often
27 unidentified federal agents are carrying out raids without prior notice to, or
28 coordination with, the Los Angeles County Sheriff's Department or any of the

1 Intervenor cities’ police departments. As a result, local authorities are left in the
2 dark about when and where federal enforcement actions or other activities are
3 scheduled to occur in their jurisdictions.

4 103. Because the unlawful raids are being conducted by masked, armed
5 agents, often without any visible identification, from the perspective of the
6 Intervenor’s residents, many of these activities are not readily distinguishable from,
7 and are therefore confused with, criminal activity. Witnesses have called 911 to
8 report kidnappings after witnessing events like a “group of armed, masked
9 men . . . dragging a woman into an SUV.”¹³ Local law enforcement agencies thus
10 have been required to divert limited resources to determining whether armed and
11 masked individuals jumping out of unmarked vehicles are federal agents or
12 individuals committing crimes.

13 104. Defendants are detaining and arresting Intervenor’s residents en masse
14 and without probable cause, which leads Intervenor’s residents to reasonably infer
15 that the detentions are based on resident appearance alone. Eyewitness accounts
16 reveal a disturbing pattern of racial profiling. As one observer described, “They
17 don’t care if you have papers, as long as you look like what they want you to look
18 like, they’ll take you.”¹⁴ A witness to another raid similarly recounted that “if you
19 looked Hispanic in any way, they just took you.”¹⁵

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22 ¹³ Libor Jany, *Kidnappers or ICE agents? LAPD grapples with surge in calls from*
23 *concerned citizens*, L.A. TIMES (July 3, 2025), <https://www.latimes.com/california/story/2025-07-03/los-angeles-police-immigration-kidnappings>.

24 ¹⁴ Travis Schlepp, *ICE agents make arrest at Los Angeles area church*, KTLA 5
25 (June 11, 2025), <https://ktla.com/news/local-news/ice-agents-make-arrest-at-los-angeles-area-church/#:~:text=Community%20members%20and%20religious%20leaders,in%20the%20church%20parking%20lot>.

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27 ¹⁵ Jasmine Mendez et al., *Immigration raids continue as Trump appears to soften on*
28 *targeting some workplaces*, L.A. TIMES (June 15, 2025), <https://www.latimes.com/california/story/2025-06-15/los-angeles-immigration-raids-continue>.

1 105. Defendants’ pattern of arresting people merely because they appear to
2 be immigrants reaches U.S. citizens and other individuals with legal status. In one
3 recent example, Defendants arrested U.S. citizen Andrea Velez, forcibly “lifting
4 [her] off the ground and carrying her away” without explanation; Ms. Velez’s only
5 apparent offense was “the color of her skin.”¹⁶

6 106. Local law enforcement is left to deal with the aftermath of Defendants’
7 actions, including protests and hostility from residents whose community members
8 are the victims of such actions.

9 107. Defendants’ unlawful actions are directly harming the relationship
10 between Intervenor’s local law enforcement and their communities, including
11 immigrant communities. Local law enforcement, including the Los Angeles County
12 Sheriff’s Department and the Intervenor cities’ police departments, has implemented
13 policies and practices designed to promote the safety of residents by fostering
14 cooperation and trust between members of the region’s many immigrant
15 communities and law enforcement. One fundamental goal of these local policies
16 and practices has been to encourage victims and witnesses to collaborate with the
17 police, regardless of immigration status. But Defendants’ actions are eroding
18 Intervenor’s hard-won gains. Indeed, local law enforcement officers have already
19 been confused for federal agents and confronted by protestors who thought they
20 were conducting surveillance for an immigration sweep, and Intervenor’s ability to
21 obtain just outcomes for victims is being hindered by fear of arrest by federal agents
22 in public or at courthouses.

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27 ¹⁶ Dani Anguiano, *US citizen arrested during ICE raid in what family describes as*
28 *‘kidnapping,’* THE GUARDIAN (June 26, 2025), <https://www.theguardian.com/us-news/2025/jun/26/immigration-ice-raid-andrea-velez>.

1 ***B. Defendants’ Terror Campaign Chills Business and Drains Intervenor’s Tax***
2 ***Revenue***

3 108. Defendants’ actions also are harming Intervenor’s tax revenue.
4 Intervenor’s depend in part on business, sales, and/or hotel and motel taxes to fund
5 municipal operations. But because Defendants’ unlawful raids are sweeping up
6 citizens and noncitizens alike, many residents are unsurprisingly choosing to stay
7 home, regardless of their legal status.

8 109. The consequences for Intervenor’s are significant. Many residents and
9 people who work in Intervenor’s jurisdictions are immigrants or children or other
10 relatives of immigrants from ethnic backgrounds that Defendants are
11 indiscriminately and illegally targeting in their raids, including, as described in
12 detail in the Lead Complaint, people of Latino origin. Over 1.8 million City of Los
13 Angeles residents—nearly 48%—identify as Hispanic or Latino.¹⁷ Over 4.8 million
14 in the County—nearly 49%—do so. Another 15% of the County identifies as Asian.
15 Pico Rivera is more than 90% Latino. Monterey Park is approximately 65% Asian.

16 110. Defendants’ actions have instilled widespread fear in Intervenor’s
17 communities. People are afraid to leave their homes in order to avoid becoming the
18 next victim of Defendants’ unlawful raids. In the MacArthur Park neighborhood
19 and in Boyle Heights, for example, children are being sent out on errands
20 unaccompanied by their parents. Intervenor’s Culver City, Montebello, Monterey
21 Park, Pasadena, Pico Rivera, Santa Monica, and West Hollywood all document a
22 similar chilling effect on their residents. As a result, Defendants’ actions have
23 created a *de facto* lockdown of neighborhoods throughout the region. Shops and
24

25 _____
26 ¹⁷ U.S. Census Bureau, Los Angeles City, California, [https://data.census.gov/profile/](https://data.census.gov/profile/Los_Angeles_city,_California?g=160XX00US0644000#race-and-ethnicity)
27 [Los_Angeles_city,_California?g=160XX00US0644000#race-and-ethnicity](https://data.census.gov/profile/Los_Angeles_city,_California?g=160XX00US0644000#race-and-ethnicity)
28 (identifying 1,829,991 “Hispanic or Latino” individuals in Los Angeles); Los Angeles City Planning, Demographics, [https://planning.lacity.gov/resources/](https://planning.lacity.gov/resources/demographics)
demographics (identifying 48% of Los Angeles population as “Hispanic”).

1 restaurants are sitting empty and suffering business owners describe the situation as
2 akin to the loss of business in the COVID pandemic.

3 111. Intervenors, in turn, lose vital tax revenue from those businesses. In the
4 past two years, business and sales taxes comprised approximately 12.5% of
5 Intervenor Los Angeles’s annual revenue budget. Those taxes are generally based
6 on gross receipts. Empty businesses do not generate gross receipts—and thus do not
7 pay business taxes or remit sales taxes to Los Angeles. As another example,
8 Intervenor Culver City documented lower visits to the Culver City Westfield Mall
9 for the entire week of June 23, 2025. Taxes from businesses in the Culver City
10 Westfield Mall are a substantial source of revenue for Culver City.

11 ***C. Defendants’ Actions Threaten the Functioning of California Courts***

12 112. California law prohibits the “civil arrest in a courthouse” of any person
13 “attending a court proceeding or having legal business in the courthouse.” Cal. Civ.
14 Code § 43.54. This prohibition reflects the California legislature’s judgment that
15 courthouse arrests pose a “threat to the proper functioning of California’s
16 government and to the rights enjoyed by all Californians.”¹⁸ As the former Chief
17 Justice of the California Supreme Court, Tani G. Cantil-Sakauye, has explained,
18 “enforcement policies that include stalking courthouses and arresting undocumented
19 immigrants undermine the judiciary’s ability to provide equal access to
20 justice.”¹⁹

21 113. Moreover, a long-established federal common law privilege forbids
22 civil arrests in or near courthouses. This privilege extends to parties, witnesses, and
23 all people going to court on business.

24 ¹⁸ See A.B. No. 668, 2019–2020 Legis. Sess., § 1(a) (Cal. 2019).

25 ¹⁹ Letter from Chief Justice Tani G. Cantil-Sakauye to Attorney General Jeff
26 Sessions (March 16, 2017),
27 [https://newsroom.courts.ca.gov/sites/default/files/newsroom/document/Chief%2520](https://newsroom.courts.ca.gov/sites/default/files/newsroom/document/Chief%2520Justice%2520Cantil-Sakauye%2520Letter_AG%2520Sessions-Secretary%2520Kelly_3-16-17.pdf)
28 [Justice%2520Cantil-Sakauye%2520Letter_AG%2520Sessions-](https://newsroom.courts.ca.gov/sites/default/files/newsroom/document/Chief%2520Justice%2520Cantil-Sakauye%2520Letter_AG%2520Sessions-Secretary%2520Kelly_3-16-17.pdf)
[Secretary%2520Kelly_3-16-17.pdf](https://newsroom.courts.ca.gov/sites/default/files/newsroom/document/Chief%2520Justice%2520Cantil-Sakauye%2520Letter_AG%2520Sessions-Secretary%2520Kelly_3-16-17.pdf).

1 114. Despite the clear statutory and common law prohibitions on civil
2 arrests in and around courthouses, Defendants have seized Intervenor's residents
3 who are traveling to and from state courthouses to attend legal proceedings or
4 address other legal business. For example, federal immigration agents recently
5 stalked two women in the hallways of the Airport Courthouse on La Cienega
6 Boulevard and arrested the women after they appeared for their scheduled court
7 proceedings. Federal agents handcuffed the women, placed them in unmarked
8 vehicles, and drove away. The court was not provided advance notice of these
9 arrests.²⁰

10 115. Defendants' actions interfere with the functioning of California's
11 judiciary and threaten the rights enjoyed by all Californians, including Intervenor's
12 residents. To take just one example, prosecutors report that some victims and
13 witnesses are reluctant to even come to court out of fear of being accosted by federal
14 immigration officials.

15 CAUSES OF ACTION

16 COUNT I

17 **Violation of the Fourth Amendment: 18 Detention Stop Without Reasonable Suspicion**

19 **(Asserted by Plaintiffs and Intervenor Plaintiffs)**

20 116. The foregoing allegations are re-alleged and incorporated herein by
21 reference.

22 117. Except at the border and its functional equivalents, the Fourth
23 Amendment prohibits Defendants from conducting a detentive stop to investigate a
24 person's immigration status without reasonable suspicion that a person is a
25 noncitizen unlawfully in the United States.

26
27 ²⁰ James Queally, *ICE arrests at L.A. courthouse met with alarm: 'Absolutely*
28 *blindsided'*, L.A. TIMES (June 25, 2025), <https://www.latimes.com/california/story/2025-06-25/ice-arrests-los-angeles-courthouse>.

1 118. “A person’s mere propinquity to others independently suspected of
2 [unlawful] activity does not, without more, give rise to probable cause to search [or
3 seize] that person.” *Perez Cruz v. Barr*, 926 F.3d 1128, 1138 (9th Cir. 2019)
4 (alterations in original, citation omitted). “‘Reasonable suspicion’ is no different.”
5 *Id.* (citation omitted).

6 119. Defendants have a policy, pattern, and practice of stopping individuals
7 without regard to reasonable suspicion that they are unlawfully in the United States.

8 120. As a part of Defendants’ policy, pattern, and practice, when conducting
9 stops, Defendants engage in a show of force so overwhelming that a reasonable
10 person would not feel free to leave. As a matter of policy, pattern, and practice,
11 Defendants do not evaluate the need for force or tailor the force they use to the
12 circumstances of individual stops and arrests.

13 121. Defendants’ policy, pattern, and practice violates the Fourth
14 Amendment to the U.S. Constitution.

15 122. Defendants’ policy, pattern, and practice have caused ongoing harm to
16 Intervenorors.

17 COUNT II

18 **Violation of 8 U.S.C. § 1357(a)(2):** 19 **Warrantless Arrests Without Probable Cause of Flight Risk** 20 **(Asserted by Plaintiffs and Intervenor Plaintiffs)**

21 123. The foregoing allegations are realleged and incorporated herein by
22 reference.

23 124. 8 U.S.C. § 1357(a)(2) requires that arrests without a warrant be
24 accompanied by “reason to believe” that an individual is “likely to escape before a
25 warrant can be obtained for [their] arrest.”

26 125. Defendants have a policy, pattern, and practice of making arrests
27 without any warrant and without making an individualized determination of flight
28 risk. They have no mechanism for ensuring compliance with the statutory limits of

1 agents' and officers' warrantless arrest authority and do not provide guidance to
2 agents and officers on how to make an individualized determination of likelihood of
3 escape. Defendants permit agents and officers to make warrantless arrests *carte*
4 *blanche* in violation of law.

5 126. Defendants' policy, pattern, and/or practice of making warrantless
6 arrests without the required individualized flight risk analysis is "final agency
7 action" that is "in excess of statutory jurisdiction, authority, or limitations" under 8
8 U.S.C. § 1357(a)(2). 5 U.S.C. §§ 704, 706(2)(C).

9 127. Separate from the APA, Defendants' policy, pattern, and practice of
10 making warrantless arrests without the required individualized flight risk analysis is
11 *ultra vires*.

12 128. Defendants' policy, pattern, and practice have caused ongoing harm to
13 Intervenors.

14 **COUNT III**

15 **Violation of 8 C.F.R. § 287.8(c)(ii)** 16 **Standards for Stops and Warrantless Arrests**

17 **(Asserted by Plaintiffs and Intervenor Plaintiffs)**

18 129. The foregoing allegations are realleged and incorporated herein by
19 reference.

20 130. Defendants are bound by regulation to conform warrantless arrests to
21 the standards in 8 C.F.R. § 287.8(c), including the requirement at 8 C.F.R.
22 § 287.8(c)(2)(ii) that officers have reason to believe that an individual is "likely to
23 escape before a warrant can be obtained."

24 131. Defendants have a policy, pattern, and practice of making arrests
25 without any warrant and without making an individualized determination of flight
26 risk. They have no mechanism for ensuring compliance with the regulatory limits of
27 agents' and officers' warrantless arrest authority and do not provide guidance to
28 agents and officers on how to make an individualized determination of likelihood of

1 escape. Defendants permit agents and officers to make warrantless arrests *carte*
2 *blanche* in violation of law.

3 132. Defendants' policy, pattern, and practice is "final agency action" that is
4 "in excess of statutory jurisdiction, authority, or limitations" under 8 C.F.R.
5 § 287.8(c)(2)(ii). 5 U.S.C. §§ 704, 706(2)(C).

6 133. Defendants' policy, pattern, and practice have caused ongoing harm to
7 Intervenor.

8 **COUNT IV**

9 **Violation of 8 C.F.R. § 287.8(c)(2)(iii)**
10 **Failure to Identify Authority and Reason for Arrest**
11 **(Asserted by Plaintiffs and Intervenor Plaintiffs)**

12 134. The foregoing allegations are realleged and incorporated herein by
13 reference.

14 135. The regulations require agents and officers, at the time of an arrest or as
15 soon as it is practicable and safe to do so, to identify themselves as "an immigration
16 officer who is authorized to execute an arrest" and "[s]tate that the person is under
17 arrest and the reason for the arrest." 8 C.F.R. § 287.8(c)(2)(iii).

18 136. Defendants have a policy, pattern, and practice of not timely
19 identifying themselves, their authority to execute an immigration arrest, or the
20 reasons for an arrest.

21 137. Defendants' policy, pattern, and practice is a "final agency action" that
22 is "in excess of statutory jurisdiction, authority, or limitations" under 8 C.F.R.
23 § 287.8(c)(2)(ii). 5 U.S.C. §§ 704, 706(2)(C).

24 138. Defendants' policy, pattern, and practice have caused ongoing harm to
25 Intervenor.

COUNT V

**Administrative Procedure Act:
Agency Action Exceeding Statutory Authority
(Asserted by Intervenor Plaintiffs)**

139. The foregoing allegations are realleged and incorporated herein by reference.

140. Administrative agencies may only exercise authority validly conferred by statute. Under the Administrative Procedure Act, courts must “hold unlawful and set aside” federal agency action that is “in excess of statutory jurisdiction, authority, or limitations.” 5 U.S.C. § 706(2)(C).

141. California law prohibits the civil arrest in a courthouse of any person attending a court proceeding or having legal business in the courthouse.

142. Congress has not authorized Defendants to conduct courthouse arrests in violation of California law.

143. A long-established federal common-law privilege forbids civil arrests in or near courthouses. This privilege extends to parties, witnesses, and all people attending the courts on business.

144. Congress did not displace the federal common-law privilege when it enacted the Immigration and Nationality Act.

145. Defendants’ activities, including the warrantless arrests of individuals in or near courthouses, exceed the scope of Defendants’ authority and violate this long-established prohibition on civil arrests and interfere with the ability of Intervenor’s law enforcement agencies to obtain cooperation from individuals in immigrant communities, regardless of immigration status.

COUNT VI

**Administrative Procedure Act:
Agency Action Contrary to Constitutional
Right, Power, Privilege, or Immunity**

(Asserted by Intervenor Plaintiffs)

146. The foregoing allegations are realleged and incorporated herein by reference.

147. The Administrative Procedure Act instructs courts to “hold unlawful and set aside agency action” that is “contrary to constitutional right, power, privilege, or immunity.” 5 U.S.C. § 706(2)(B).

148. The Tenth Amendment to the United States Constitution reserves “[t]he powers not delegated to the United States by the Constitution . . . to the States.”

149. The states’ judicial and police powers are among the most important powers that the Constitution reserves to the states.

150. Defendants’ final agency actions have resulted in harm to Intervenor.

151. In violation of the Tenth Amendment, Defendants’ policy, pattern, and practice of arresting individuals in or around California state courthouses located within Intervenor’s boundaries (the “Courthouse Arrest Policy”) commandeers California’s judicial system and unduly interferes with California’s core sovereign judicial and police functions by, among other things, preventing residents of Intervenor from accessing state courts.

152. Defendants’ violation causes ongoing harm to Intervenor and their residents.

COUNT VII

**Administrative Procedure Act:
Arbitrary and Capricious Action**

(Asserted by Intervenor Plaintiffs)

153. The foregoing allegations are realleged and incorporated herein by reference.

1 154. Under the Administrative Procedure Act, courts must hold unlawful
2 and set aside federal agency action that is arbitrary, capricious, an abuse of
3 discretion, or otherwise not in accordance with law. 5 U.S.C. § 706(2)(A).

4 155. Defendants' final agency actions have resulted in harm to Intervenor.

5 156. Defendants' Courthouse Arrest Policy is arbitrary and capricious in
6 violation of the Administrative Procedure Act.

7 157. The Courthouse Arrest Policy is arbitrary and capricious because
8 Defendants do not sufficiently explain to whom the Policy applies, do not explain
9 how the Policy complies with congressional statutes requiring certain non-citizens to
10 appear in state courts to qualify for immigration relief, fail fully to consider the
11 foreseeable harms and/or costs of the Policy, do not adequately explain its
12 prioritizing of civil arrests in or near courthouses over the harms triggered by those
13 arrests, and do not adequately justify the change from Defendants' prior policies on
14 courthouse arrests.

15 158. Defendants' violation causes ongoing harm to Intervenor and their
16 residents.

17 **COUNT VIII**

18 **Tenth Amendment**

19 **(Asserted by Intervenor Plaintiffs)**

20 159. The foregoing allegations are realleged and incorporated herein by
21 reference.

22 160. The Tenth Amendment preserves the states' historic, sovereign, and
23 fundamental autonomy to control the operation of their judiciaries and to pursue
24 criminal prosecutions.

25 161. The states' judicial and police powers are among the most important
26 powers that the Constitution reserves to the states.

27 162. In violation of the Tenth Amendment, Defendants' policy of arresting
28 Intervenor's residents in and around state courthouses commandeers California's

1 judicial system and unduly interferes with California's core sovereign judicial and
2 police functions by preventing Intervenor's residents from accessing state courts.

3 163. In violation of the Tenth Amendment, Defendants' policy of
4 conducting warrantless seizures and detentions of Intervenor's residents, without
5 notice to or coordination with local law enforcement, effectively commandeers local
6 law enforcement into responding to these incidents to ensure the safety of
7 Intervenor's residents and federal agents, and into dealing with the incidents'
8 aftermaths.

9 164. Federal courts possess the power in equity to grant injunctive relief
10 with respect to violations of federal law by federal officials.

11 165. Defendants' violation causes ongoing harm to Intervenor and their
12 residents.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Intervenor respectfully request that this Court enter
15 judgment in their favor, and grant the following relief:

16 1. Declare that Defendants' actions violate the Fourth and Tenth
17 Amendments of the United States Constitution and the Administrative Procedure
18 Act;

19 2. Issue a preliminary and permanent injunction enjoining further
20 violations of the Fourth and Tenth Amendments and Administrative Procedure Act;

21 3. Declare that Defendants' unlawful policies and practices violate 8
22 U.S.C. § 1357(a)(2); 8 C.F.R. § 287.8(c)(2)(ii); and 8 C.F.R. § 287.8(c)(2)(iii);

23 4. Declare that the Courthouse Arrest Policy exceeds Defendants'
24 statutory jurisdiction, authority, or limitations;

25 5. Declare that the Courthouse Arrest Policy is unconstitutional;

26 6. Enjoin Defendants and all of their officers, employees, agents, and
27 anyone acting in concert with them, from civilly arresting parties, witnesses, and
28

1 any other individual coming to, attending, or returning from state courthouses or
2 court-related proceedings;

3 7. Award Intervenors their reasonable fees, costs, and expenses, including
4 attorneys' fees; and

5 8. Grant such other and further relief as the Court deems just and proper.
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1 DATED: July 8, 2025

Respectfully submitted,

2
3 By: /s/ E. Martin Estrada

4 E. MARTIN ESTRADA

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ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: July 8, 2025

By: /s/ E. Martin Estrada

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