REPORT OF THE CHIEF LEGISLATIVE ANALYST

DATE: September 10,2025

TO: Honorable Members of the Rules, Elections, and Intergovernmental Relations Committee

FROM: Sharon M. Tso
Chief Legislative Analyst

Council File No.: 25-0002-S71, 25-0002-S73
Assignment No.: 25-08-0667, 25-08-0669

SUBJECT: Resolutions (Rodriguez – Padilla, et al.) to SUPPORT H.R.4004 (Velázquez) and S.2212 (Padilla).

CLA RECOMMENDATION: Adopt Resolutions (Rodriguez – Padilla, et al.) to include in the City's 2025-2026 Federal Legislative Program, SUPPORT for H.R.4004 (Velázquez) and S.2212 (Padilla) to require immigration enforcement authorities to display visible identification and restrict their use of wearing face coverings during enforcement actions.

SUMMARY
Two Resolutions (Rodriguez – Padilla, et al.), introduced on July 30, 2025, support legislation that would require immigration enforcement authorities to display clearly visible identification and prohibit them from wearing most face coverings during public facing enforcement actions.

Currently pending in the House of Representatives, H.R.4004 (Velázquez) would require immigration enforcement agents to wear clearly marked clothing displaying their name and affiliation with U.S. Immigration and Customs Enforcement, and prohibit them from wearing face coverings during enforcement actions. H.R.4004 would also require the supervisors of agents to submit written justification for the use of any mask by an agent within 48 hours after an immigration enforcement action. H.R.4004 would also direct the U.S. Department of Homeland Security (DHS) to establish disciplinary actions for any violations and report to Congress on complaints received by the public, and any violations by immigration agents.

Currently pending in the U.S. Senate, S.2212 would require immigration enforcement authorities, including deputized state and local officers assisting with federal immigration enforcement operations, to display clearly visible identification and prohibit them from wearing non-medical face coverings during public-facing immigration enforcement actions. S.2212 would also direct DHS to create disciplinary procedures for violations, submit annual compliance reports to Congress, and investigate complaints through the DHS Office for Civil Rights and Civil Liberties.

H.R.4004 and S.2212 seek to strengthen immigration enforcement oversight, transparency, and accountability; reduce miscommunication during immigration enforcement operations; prevent officer impersonations; and restore public trust in law enforcement. The Resolutions therefore

request that the City support these bills.

BACKGROUND

In early June 2025, federal immigration authorities began conducting widespread raids in the region to detain individuals who they suspected may be in the U.S. without legal status. Under new guidance and directives from DHS, federal immigration agents implemented new tactics for their operations, including the use of face coverings and unmarked vehicles, and a lack of identification or judicial warrants. These new methods have made it difficult for individuals to determine who is conducting the enforcement actions, distinguish federal enforcement actions from vigilante abductions, and hold certain agencies accountable for allegations of discrimination, excessive use of force, and other civil and constitutional rights violations.

DHS oversight is provided by the DHS Office for Civil Rights and Civil Liberties (CRCL), which was established by the Homeland Security Act of 2002. The CRCL reviews and investigates civil rights and civil liberties complaints filed by the public regarding the agency's policies and activities, and provides legal and policy advice to DHS leadership on civil rights and civil liberties issues.

In March 2025, DHS terminated the CRCL's statutory functions and more than 100 staff, ultimately freezing hundreds of open civil rights investigations involving DHS, U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, the Federal Emergency Management Agency, Federal Protective Service, and the Transportation Security Agency. Staff at the Office of the Citizenship and Immigration Services Ombudsman and the Office of the Immigration Detention Ombudsman were also cut, eliminating services to the public to resolve problems with immigration benefits and oversight on conditions at immigration detention centers. The collective reductions at these offices have eliminated internal monitors at DHS to assess the legality, effectiveness, and issues with the implementation of the current administration's policies on immigration enforcement.

In late May 2025, the DHS announced that it was reversing previous actions to shutter the CRCL and Offices of the Citizenship and Immigration Services Ombudsman and the Immigration Detention Ombudsman, following lawsuits and a preliminary injunction against DHS.

H.R.4004 seeks to clarify the identification requirements of immigration enforcement agents and protocols to allow the use of facial coverings during enforcement actions. H.R.4004 also directs the Secretary of Homeland Security to establish procedures to ensure compliance and a process to accept and review complaints that allege violations of the Act by the CRCL. In addition, the bill would require the Secretary of Homeland Security to report annually to Congress on any disciplinary actions imposed and complaints received.

S.2212 would amend Section 287 of the Immigration and Nationality Act to require all immigration enforcement officers, including deputized state and local officers, to display visible identification during public-facing immigration enforcement actions, including patrols, stops, arrests, raids, searches, checkpoint inspections, interviews, and the services of judicial or administrative warrants. The use of face coverings would remain allowed for medical purposes, hazardous environmental conditions, and during covert operations and activity that is not

observable by the public. S.2212 would also require immigration officers who directly engage in public immigration enforcement functions in the U.S. to display their name or initials, their employing agency, and their badge or identification number at all times, legible from a distance of up to 25 feet.

To ensure compliance with the Act, S.2212 would direct the Secretary of Homeland Security to ensure that any officers who fail to comply receive appropriate administrative discipline, as well as report to CRCL, the House and Senate Judiciary Committees, the Senate Committee on Homeland Security and Governmental Affairs, and the House Committee on Homeland Security the total number of public immigration enforcement actions conducted during the reporting period, the number of violations of the Act, and disciplinary actions taken against noncompliant officers. S.2212 would direct CRCL to receive complaints from the public regarding violations of the Act, recommend compliance and corrective actions, and include any findings and actions taken in its annual public report.

Our Office recommends support of these two federal bills, as they would amend the federal legislation governing federal immigration enforcement activities, procedures, and oversight. A similar bill is pending at the State level in the Senate (SB 627 - Wiener) to prohibit all law enforcement officers operating in California from wearing facial coverings, but it was recently amended to only apply to local and federal officers and would not apply to officers of State-level agencies, amid concerns that the bill would put their safety at risk. State legislators will vote on SB 627 by the end of this week.

In September 2025, the Supreme Court overturned a federal judge's order that prohibited federal immigration agents in Los Angeles from stopping and questioning people based on factors like their ethnicity. The Supreme Court ruling provides immigration agents the broad authority to continue to stop people based on "the totality of circumstances," including a person's appearance, language spoken, or place of employment.

DEPARTMENTS NOTIFIED

Community Investment for Families Department

BILL STATUS

H.R.4004

6/12/25 Introduced, referred to the Committee on the Judiciary

S.2212

7/8/25 Introduced, referred to the Committee on the Judiciary

Susan Oh
Analyst

Attachments: Resolutions (Rodriguez – Padilla, et al.)

RESOLUTION RULES, ELECTIONS, INTERGOVERNMENTAL RELATIONS

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council; and

WHEREAS, in recent months, federal immigration enforcement officers have carried out targeted enforcement operations in plainclothes, wearing face coverings, and without visible identification; and

WHEREAS, according to the Code of Federal Regulations, U.S. Immigration and Customs Enforcement (ICE) agents are not required to wear body cameras, are not always obligated to provide their identification at the time of an arrest, and are authorized to conceal their faces and use unmarked vehicles; and

WHEREAS, since 2005, ICE agents have utilized strategic deception, or "ruses" to facilitate enforcement operations and gain access to individuals and information without judicial warrants; and

WHEREAS, these tactics have endangered public safety by creating confusion, fear, and mistrust in communities across the City, and have shielded federal agents from basic accountability; and

WHEREAS, currently pending before the U.S. Senate is S.2212 (Padilla), the Visible Identification Standards for Immigration-Based Law Enforcement (VISIBLE) Act of 2025, which would require immigration enforcement officers to display clearly visible identification and prohibit them from wearing non-medical face coverings during public-facing immigration enforcement actions; and

WHEREAS, S. 2212 would also apply to deputized state and local officers assisting in federal immigration enforcement operations; and

WHEREAS, S.2212 would direct the U.S. Department of Homeland Security to create disciplinary procedures for violations, submit annual compliance reports to Congress, and investigate complaints through its Office for Civil Rights and Civil Liberties; and

WHEREAS, S.2212 would strengthen oversight, transparency, and accountability for immigration enforcement tactics; reduce miscommunication during immigration enforcement encounters; and prevent officer impersonations;

NOW, THEREFORE, BE IT RESOLVED, that by adoption of this Resolution, the City of Los Angeles hereby includes in its 2025-26 Federal Legislative Program, SUPPORT for S.2212 (Padilla) to require federal agents to display clearly visible identification and prohibit them from wearing most face coverings during public-facing immigration enforcement actions.

PRESENTED BY: Monica Rodriguez
MONICA RODRIGUEZ
Councilmember, 7th District

JUL 30 2025

SECONDED BY: Imelda Padilla

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RULES, ELECTIONS, INTERGOVERNMENTAL RELATIO

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council; and

WHEREAS, in recent months, U.S. Immigration and Customs Enforcement (ICE) agents have conducted arrests in plainclothes and masks, without identifying themselves or their agency; and

WHEREAS, these arrests have created confusion, panic, and mistrust in communities that are already fearful and vulnerable, and have given way to impersonation, abuse, and civil rights violations; and

WHEREAS, people in the U.S. have a fundamental right to know who is detaining them, the reason for their arrest, and how to hold officers accountable if their rights are violated; and

WHEREAS, currently pending before the U.S. House of Representatives is H.R.4004 (Velázquez), the No Masks for ICE Act, which would require immigration enforcement agents to wear clearly marked clothing displaying their name and affiliation with ICE, and prohibit them from wearing facial coverings during enforcement actions; and

WHEREAS, H.R.4004 would also require written justification for any use of a mask by an agent, to be submitted by a supervisor no later than 48 hours after the immigration enforcement action; and

WHEREAS, H.R.4004 would require the U.S. Department of Homeland Security to establish disciplinary actions for any violations and submit annual reports to Congress on complaints and violations by immigration enforcement agents; and

WHEREAS, H.R.4004 would restore basic standards, transparency, and accountability to immigration enforcement in the U.S.;

NOW, THEREFORE, BE IT RESOLVED, that by adoption of this Resolution, the City of Los Angeles hereby includes in its 2025-26 Federal Legislative Program, SUPPORT for H.R.4004 (Velázquez) to require federal agents enforcing immigration laws to wear clothing that clearly displays their name and agency, and ban them from wearing face coverings during enforcement actions.

PRESENTED BY: Monica Rodriguez
MONICA RODRIGUEZ
Councilmember, 7th District

SECONDED BY: Imelda Padilla

JUL 30 2025

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