

REPORT OF THE CHIEF LEGISLATIVE ANALYST

DATE: March 3, 2026

TO: Honorable Members of the City Council

FROM: Sharon M. Tso 
Chief Legislative Analyst

Council File No.: 26-0002-S1
Assignment No.: 26-01-0048

SUBJECT: AB 1537 (Bryan)

CLA RECOMMENDATION: Adopt Resolution (Soto-Martinez - Rodriguez) to include in the City's 2025-2026 State Legislative Program SUPPORT for AB 1537, to prohibit peace officers from being employed by, serve as an independent contractor for, or volunteering with the United States Department of Homeland Security (DHS) or its contractors or any other entity that assists with or engages in immigration enforcement AND SEEK AMENDMENTS to clarify that this legislation only applies to individuals directly engaged in immigration enforcement actions on behalf of the Department of Homeland Security.

SUMMARY

On January 21, 2026 a Resolution (Soto-Martinez – Rodriguez) was introduced in support of AB 1537 (Bryan), which would prohibit peace officers from being employed by, serving as an independent contractor for, or volunteering with the United States Department of Homeland Security (DHS) or its contractors or any other entity that assists with or engages in immigration enforcement. The Resolution states that the City recognizes the importance of public trust, transparency and accountability in law enforcement, and that AB 1537 would make a failure to comply with the prohibition established by this bill an act of dishonesty and grounds for decertification as a peace officer, thereby aligning secondary employment rules with existing standards for peace officer conduct and certification.

The Resolution further states that the bill would explicitly state that records related to secondary employment of peace officers are public records for purposes of the California Public Records Act, strengthening transparency by making these disclosures accessible to the public and that the provisions of this bill seek to ensure consistent standards statewide that reduce ambiguity about peace officer roles in sensitive enforcement contexts and promote public confidence in law enforcement practices while balancing statutorily mandated local responsibilities. The Resolution, therefore, seeks an official position of the City of Los Angeles to support AB 1537.

BACKGROUND

Under current law, peace officers are not prohibited from engaging in, or being employed in, casual or part-time employment as a private security guard or patrol officer for a public entity while off duty, or as a private security guard or patrol officer for a private employer while off duty from their principal employment and outside of their regular employment. Officers are also authorized to engage in, or be employed in, other employment while off duty. Officers generally need authorization from their employer to engage in outside employment, and that employment should not conflict, interfere or be incompatible with the duties of their employment as a peace officer.

Recent efforts by the DHS, in particular the Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) to expand quickly to staff its immigration enforcement actions have raised concerns about outside employment of peace officers in these types of actions. ICE and CBP have engaged in aggressive and often dangerous enforcement actions, which have led to the deaths of multiple individuals, as well as various other civil rights violations.

AB 1537 (Bryan) seeks to ensure that law enforcement officers in the State of California cannot moonlight as DHS employees engaged in immigration enforcement actions, and would prohibit peace officers from being employed by, serving as an independent contractor for, volunteering with the DHS or its contractors or any other entity that assists with or engages in immigration enforcement. The bill would provide that failure to comply with this provision constitutes, for certain purposes, an act of dishonesty and that it is grounds for decertification as a peace officer. The bill would also require a peace officer to report to their employing law enforcement agency any secondary employment relating to immigration enforcement, and explicitly state that records related to secondary employment of peace officers are public records for the purposes of the California Public Records Act.

While the intent of the legislation is clear, amendments should be made to ensure that it applies explicitly to peace officers volunteering or taking secondary employment in an immigration enforcement position. As the bill is currently written, any outside employment for DHS or its contractors, could be construed as a violation, even when that employment has nothing to do with immigration enforcement. The DHS is a large organization that oversees a number of agencies, including the Coast Guard, Transportation Security Administration, the Federal Emergency Management Agency, the Secret Service, and others. As authorized under SB 54 (2018) (De León), local law enforcement agencies, including the Los Angeles Police Department (LAPD) work closely with DHS entities on a number of task forces, including the Operations South Bureau and Homeland Security Investigations Human Trafficking Task Force, the Homeland Security Task Force, the Cyber Fraud Task Force, the Pacific Southwest Regional Fugitive Task Force, and the Internet Crimes Against Children Task Force, among others. The current language of AB 1537 is so broad that it is unclear whether participation in Joint Task Forces with DHS would constitute secondary employment and be a violation of the law.

Further, the legislation would apply to “any other entity that assists with or engages in immigration enforcement” which could encompass the Department of Defense and the Armed Services, including the military reserves. Currently, 227 LAPD sworn and civilian members are serving as military reservists, including 17 as Coast Guard reservists. If broadly interpreted, AB 1537 would prohibit an individual from serving in the armed forces reserves.

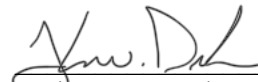
The same issue applies to contractors for DHS, as DHS contracts with a variety of entities that are not engaged in immigration enforcement. As its currently written, an off-duty officer employed as a security guard for a contractor’s building could be found in violation of AB 1537 even when not engaged in immigration enforcement, or even in cases where the DHS contractor they are employed by is not engaged in immigration enforcement.

The LAPD has indicated it is concerned with this legislation, and its potential impacts if broadly interpreted to prohibit any volunteering or part-time employment with DHS, its contractors and

any other entity that assists with or engages in immigration enforcement. This bill is opposed by the California Police Chiefs Association as it believes that AB 1537's sweeping and ambiguous language would produce far-reaching unintended consequences, including effectively prohibiting military reserve service by peace officers, creating uncertainty about routine task force participation and federal cooperation, discouraging volunteer service during emergencies, undermining critical interagency partnerships, exposing officers' sensitive personal financial information, and duplicating and complicating existing law under SB 54 (de León), the California Values Act (2018), which governs local law enforcement cooperation with immigration enforcement.

BILL STATUS

01/05/2026	Read first time. To print.
01/06/2026	From printer. May be heard in Committee February 5
02/02/2026	Referred to the Committee on Public Safety



Joshua W. Drake
Analyst

Attachments: 1. Resolution

RESOLUTION

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

WHEREAS, the City of Los Angeles recognizes the importance of public trust, transparency, and accountability in law enforcement; and

WHEREAS, Assembly Bill 1537 would prohibit peace officers from being employed by, serving as an independent contractor for, or volunteering with the United States Department of Homeland Security (DHS) or its contractors or any other entity that assists with or engages in immigration enforcement, enhancing clarity around permissible secondary employment for peace officers and reducing potential conflicts of duty; and

WHEREAS, Assembly Bill 1537 would make failure to comply with that prohibition, for certain purposes, an act of dishonesty and grounds for decertification as a peace officer, thereby aligning secondary employment rules with existing standards for peace officer conduct and certification; and

WHEREAS, AB 1537 would require a peace officer to report to their employing law enforcement agency any secondary employment relating to immigration enforcement, advancing internal accountability and ensuring employing agencies have knowledge of all such engagements; and

WHEREAS, the bill would explicitly state that records related to secondary employment of peace officers are public records for purposes of the California Public Records Act, strengthening transparency by making these disclosures accessible to the public; and

WHEREAS, Assembly Bill 1537's provisions seek to ensure consistent standards statewide that reduce ambiguity about peace officer roles in sensitive enforcement contexts and promote public confidence in law enforcement practices while balancing statutorily mandated local responsibilities; and


WHEREAS, the City of Los Angeles routinely considers the impacts of state legislation on municipal authority, public safety, civil rights, and community relationships with law enforcement agencies, and supports legislative steps that improve clarity, public oversight, and accountability in peace officer employment practices; now, therefore, be it

NOW, THEREFORE BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2025 State Legislative Program SUPPORT for Assembly Bill 1537 to prohibit peace officers from being employed by, serving as an independent contractor for, or volunteering with the United States Department of Homeland Security (DHS) or its contractors or any other entity that assists with or engages in immigration enforcement.

PRESENTED BY:


 HUGO SOTO-MARTINEZ
 Councilmember, 13th District

SECONDED BY:



ORIGINAL


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