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Policy Counsel & Senior Staff Attorney
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December 19, 2017

Via email: cboyd@burnetsheriff.com
Burnet County's Sheriff Department
Sheriff Calvin Boyd
PO Box 1249
Burnet, TX 78611-1249

Dear Sheriff Boyd,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

We can all agree, including members of the Texas Major Cities Chiefs¹, that public safety is paramount to our communities and our state, but yet such collaboration through a 287(g) agreement is not mandatory and makes our communities *less* safe. This program has a track record of devastating consequences for community relations: it erodes people's trust in our officers and makes residents reluctant to report crimes because they fear they or their family members might face deportation. In addition, such collaboration strains public funds and exposes local governments to legal liability. Do not allow lawmakers to use your department for political grandstanding. Instead, we urge you to place your community and its safety first by refusing to enter into a 287(g) agreement or any other intergovernmental service agreement with ICE. The costs of enmeshing the County in federal civil immigration enforcement far outweigh any perceived benefits.

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287(g) agreements drain department finances

287(g) agreements cost counties significant amounts of money while damaging public safety and community trust in law enforcement. The American Immigration Council's analysis of the program's history makes clear that "state and local governments have to pay the majority of [287(g)] costs . . . including travel, housing, and per diem for officers during training; salaries; overtime; other personnel costs; and administrative supplies."² These and other costs add up. For example, Harris County Sheriff Ed Gonzalez estimated that the program cost his department \$675,000 annually before he rescinded its agreement.³ Mecklenburg County in North Carolina spent \$5.3 million to operate a 287(g) program in its first year alone, while another North Carolina county, Alamance, spent \$4.8 million in the first year of its 287(g) agreement.⁴ Fort Bend County decided not to apply for a 287(g) program because "[the county] would have been forced to send six personnel members to a four-week training, at a cost of half a million dollars. Sheriff Nehls said he wouldn't feel comfortable 'knowing he'd send \$500,000 of taxpayers' money for something that maybe makes us feel good . . . it would be irresponsible for me to do that.'"⁵ Instead of spending taxpayer money on a federal responsibility, money can be used to better protect your community.

Participating in 287(g) undermines community trust and safety

In addition to depleting law enforcement resources, the program jeopardizes community safety. When sheriffs or other County employees engage in immigration enforcement, fewer people report crimes for fear of being deported—a result which is bad for all Texans. A study of Latinos' perceptions of law enforcement in four counties (Cook, Harris, Los Angeles and Maricopa) showed that, in light of increasing police involvement with immigration officials, 70% of undocumented immigrants reported that they are less likely to contact law enforcement if they became victims of a crime out of fear they would be questioned about immigration status.⁶ In April, the Houston Police Department (whose territory, as you know, overlaps with Harris County) announced a decrease of more than 40% in rape reports among Hispanics due to "fear of themselves being taken into custody by immigration authorities"⁷. In Los Angeles, Chief Charlie Beck stated that sexual assault reports dropped by a quarter in his city this year because undocumented

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immigrants feared deportation when they interacted with police or testified in court.⁸ He asked his city to “[i]magine, a young woman, imagine your daughter, your sister, your mother . . . not reporting a sexual assault, because they are afraid that their family will be torn apart.”⁹

Such staggering decreases in civilian cooperation hamper core police work and pose serious public safety concerns. A recent study from the University of Tampa analyzed the effects of 287(g) program implementation in Frederick County, Maryland and found that “the program led to a significantly higher number of arrests of Hispanics by the Sheriff’s Office than would have occurred in its absence, indicating that attention was focused toward the Hispanic community as a result of the program.”¹⁰ Exacerbating the concerns to public safety is the reality that the program is not effective: many of the people targeted by 287(g) programs pose no threat to public safety and have no criminal record. The Migration Policy Institute found that “the [287(g)] program is not targeted primarily or even mostly toward serious offenders.”¹¹ We are not alone in this concern: leading law-enforcement voices¹² agree with our opposition to the entanglement of immigration enforcement with local policing.

287(g) programs expose Burnet County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

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Given the multitude of financial and other costs of 287(g) programs and the minimal benefits they bring, we call on the County to follow Harris County and Fort Bend County's examples and reconsider its entanglement with federal immigration enforcement programs like 287(g).

We would like to schedule a meeting with your staff in order to discuss these concerns in person. Thank you for your consideration.

Respectfully submitted,



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December 19, 2017

Via email: al.auxier@co.kendall.tx.us
Kendall County's Sheriff Department
Sheriff Al Auxier
6 Staudt St.
Boerne, TX 78006

Dear Sheriff Auxier,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

We can all agree, including members of the Texas Major Cities Chiefs¹, that public safety is paramount to our communities and our state, but yet such collaboration through a 287(g) agreement is not mandatory and makes our communities *less* safe. This program has a track record of devastating consequences for community relations: it erodes people's trust in our officers and makes residents reluctant to report crimes because they fear they or their family members might face deportation. In addition, such collaboration strains public funds and exposes local governments to legal liability. Do not allow lawmakers to use your department for political grandstanding. Instead, we urge you to place your community and its safety first by refusing to enter into a 287(g) agreement or any other intergovernmental service agreement with ICE. The costs of enmeshing the County in federal civil immigration enforcement far outweigh any perceived benefits.

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Such staggering decreases in civilian cooperation hamper core police work and pose serious public safety concerns. A recent study from the University of Tampa analyzed the effects of 287(g) program implementation in Frederick County, Maryland and found that “the program led to a significantly higher number of arrests of Hispanics by the Sheriff’s Office than would have occurred in its absence, indicating that attention was focused toward the Hispanic community as a result of the program.”¹⁰ Exacerbating the concerns to public safety is the reality that the program is not effective: many of the people targeted by 287(g) programs pose no threat to public safety and have no criminal record. The Migration Policy Institute found that “the [287(g)] program is not targeted primarily or even mostly toward serious offenders.”¹¹ We are not alone in this concern: leading law-enforcement voices¹² agree with our opposition to the entanglement of immigration enforcement with local policing.

287(g) programs expose Kendall County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

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Given the multitude of financial and other costs of 287(g) programs and the minimal benefits they bring, we call on the County to follow Harris County and Fort Bend County's examples and reconsider its entanglement with federal immigration enforcement programs like 287(g).

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December 19, 2017

Via email: jim.kaelin@co.nueces.tx.us
Nueces County's Sheriff Department
Sheriff Jim Kaelin
PO Box 1940
Corpus Christi, TX 78403-1940

Dear Sheriff Kaelin,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

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December 19, 2017

Via email: soblt@co.potter.tx.us
Potter County's Sheriff Department
Sheriff Brian Thomas
608 S Pierce
Amarillo, TX 79101-2427

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On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

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287(g) agreements drain department finances

287(g) agreements cost counties significant amounts of money while damaging public safety and community trust in law enforcement. The American Immigration Council's analysis of the program's history makes clear that "state and local governments have to pay the majority of [287(g)] costs . . . including travel, housing, and per diem for officers during training; salaries; overtime; other personnel costs; and administrative supplies."² These and other costs add up. For example, Harris County Sheriff Ed Gonzalez estimated that the program cost his department \$675,000 annually before he rescinded its agreement.³ Mecklenburg County in North Carolina spent \$5.3 million to operate a 287(g) program in its first year alone, while another North Carolina county, Alamance, spent \$4.8 million in the first year of its 287(g) agreement.⁴ Fort Bend County decided not to apply for a 287(g) program because "[the county] would have been forced to send six personnel members to a four-week training, at a cost of half a million dollars. Sheriff Nehls said he wouldn't feel comfortable 'knowing he'd send \$500,000 of taxpayers' money for something that maybe makes us feel good . . . it would be irresponsible for me to do that.'"⁵ Instead of spending taxpayer money on a federal responsibility, money can be used to better protect your community.

Participating in 287(g) undermines community trust and safety

In addition to depleting law enforcement resources, the program jeopardizes community safety. When sheriffs or other County employees engage in immigration enforcement, fewer people report crimes for fear of being deported—a result which is bad for all Texans. A study of Latinos' perceptions of law enforcement in four counties (Cook, Harris, Los Angeles and Maricopa) showed that, in light of increasing police involvement with immigration officials, 70% of undocumented immigrants reported that they are less likely to contact law enforcement if they became victims of a crime out of fear they would be questioned about immigration status.⁶ In April, the Houston Police Department (whose territory, as you know, overlaps with Harris County) announced a decrease of more than 40% in rape reports among Hispanics due to "fear of themselves being taken into custody by immigration authorities"⁷. In Los Angeles, Chief Charlie Beck stated that sexual assault reports dropped by a quarter in his city this year because undocumented

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Such staggering decreases in civilian cooperation hamper core police work and pose serious public safety concerns. A recent study from the University of Tampa analyzed the effects of 287(g) program implementation in Frederick County, Maryland and found that “the program led to a significantly higher number of arrests of Hispanics by the Sheriff’s Office than would have occurred in its absence, indicating that attention was focused toward the Hispanic community as a result of the program.”¹⁰ Exacerbating the concerns to public safety is the reality that the program is not effective: many of the people targeted by 287(g) programs pose no threat to public safety and have no criminal record. The Migration Policy Institute found that “the [287(g)] program is not targeted primarily or even mostly toward serious offenders.”¹¹ We are not alone in this concern: leading law-enforcement voices¹² agree with our opposition to the entanglement of immigration enforcement with local policing.

287(g) programs expose Potter County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

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Given the multitude of financial and other costs of 287(g) programs and the minimal benefits they bring, we call on the County to follow Harris County and Fort Bend County's examples and reconsider its entanglement with federal immigration enforcement programs like 287(g).

We would like to schedule a meeting with your staff in order to discuss these concerns in person. Thank you for your consideration.

Respectfully submitted,



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December 19, 2017

Via email: heavenson@rockwallcountytexas.com
Rockwall County's Sheriff Department
Sheriff Harold Eavenson
972 T L Townsend
Rockwall, TX 75087

Dear Sheriff Eavenson,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

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Participating in 287(g) undermines community trust and safety

In addition to depleting law enforcement resources, the program jeopardizes community safety. When sheriffs or other County employees engage in immigration enforcement, fewer people report crimes for fear of being deported—a result which is bad for all Texans. A study of Latinos' perceptions of law enforcement in four counties (Cook, Harris, Los Angeles and Maricopa) showed that, in light of increasing police involvement with immigration officials, 70% of undocumented immigrants reported that they are less likely to contact law enforcement if they became victims of a crime out of fear they would be questioned about immigration status.⁶ In April, the Houston Police Department (whose territory, as you know, overlaps with Harris County) announced a decrease of more than 40% in rape reports among Hispanics due to "fear of themselves being taken into custody by immigration authorities"⁷. In Los Angeles, Chief Charlie Beck stated that sexual assault reports dropped by a quarter in his city this year because undocumented

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Such staggering decreases in civilian cooperation hamper core police work and pose serious public safety concerns. A recent study from the University of Tampa analyzed the effects of 287(g) program implementation in Frederick County, Maryland and found that “the program led to a significantly higher number of arrests of Hispanics by the Sheriff’s Office than would have occurred in its absence, indicating that attention was focused toward the Hispanic community as a result of the program.”¹⁰ Exacerbating the concerns to public safety is the reality that the program is not effective: many of the people targeted by 287(g) programs pose no threat to public safety and have no criminal record. The Migration Policy Institute found that “the [287(g)] program is not targeted primarily or even mostly toward serious offenders.”¹¹ We are not alone in this concern: leading law-enforcement voices¹² agree with our opposition to the entanglement of immigration enforcement with local policing.

287(g) programs expose Rockwall County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

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Given the multitude of financial and other costs of 287(g) programs and the minimal benefits they bring, we call on the County to follow Harris County and Fort Bend County's examples and reconsider its entanglement with federal immigration enforcement programs like 287(g).

We would like to schedule a meeting with your staff in order to discuss these concerns in person. Thank you for your consideration.

Respectfully submitted,



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December 19, 2017

Via email: terrell.co.so@bigbend.net
Terrell County's Sheriff Department
Sheriff Keith Hughes
PO Box 320
Sanderson, TX 79848-0320

Dear Sheriff Hughes,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

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287(g) programs expose Terrell County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

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December 19, 2017

Via email: rchody@wilco.org
Williamson County's Sheriff Department
Sheriff Robert Chody
508 S Rock St
Georgetown, TX 78626

Dear Sheriff Chody,

On behalf of the American Civil Liberties Union (ACLU) of Texas, and its thousands of members, activists, and supporters around the state, we write to urge you to withdraw your County's application to collaborate with Immigration and Customs Enforcement (ICE) through a delegation of authority pursuant to section 287(g) of the Immigration and Nationality Act (287(g) program), and respectfully request a meeting to discuss our concerns.

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¹ Davis Pughes and Art Acevedo, "Texas police chiefs: Do not burden local officers with federal immigration enforcement." DALLAS MORNING NEWS, Apr. 28, 2017, <https://www.dallasnews.com/opinion/commentary/2017/04/28/texas-police-chiefs-burden-local-officers-federal-immigration-enforcement>

287(g) agreements drain department finances

287(g) agreements cost counties significant amounts of money while damaging public safety and community trust in law enforcement. The American Immigration Council's analysis of the program's history makes clear that "state and local governments have to pay the majority of [287(g)] costs . . . including travel, housing, and per diem for officers during training; salaries; overtime; other personnel costs; and administrative supplies."² These and other costs add up. For example, Harris County Sheriff Ed Gonzalez estimated that the program cost his department \$675,000 annually before he rescinded its agreement.³ Mecklenburg County in North Carolina spent \$5.3 million to operate a 287(g) program in its first year alone, while another North Carolina county, Alamance, spent \$4.8 million in the first year of its 287(g) agreement.⁴ Fort Bend County decided not to apply for a 287(g) program because "[the county] would have been forced to send six personnel members to a four-week training, at a cost of half a million dollars. Sheriff Nehls said he wouldn't feel comfortable 'knowing he'd send \$500,000 of taxpayers' money for something that maybe makes us feel good . . . it would be irresponsible for me to do that.'"⁵ Instead of spending taxpayer money on a federal responsibility, money can be used to better protect your community.

Participating in 287(g) undermines community trust and safety

In addition to depleting law enforcement resources, the program jeopardizes community safety. When sheriffs or other County employees engage in immigration enforcement, fewer people report crimes for fear of being deported—a result which is bad for all Texans. A study of Latinos' perceptions of law enforcement in four counties (Cook, Harris, Los Angeles and Maricopa) showed that, in light of increasing police involvement with immigration officials, 70% of undocumented immigrants reported that they are less likely to contact law enforcement if they became victims of a crime out of fear they would be questioned about immigration status.⁶ In April, the Houston Police Department (whose territory, as you know, overlaps with Harris County) announced a decrease of more than 40% in rape reports among Hispanics due to "fear of themselves being taken into custody by immigration authorities"⁷. In Los Angeles, Chief Charlie Beck stated that sexual assault reports dropped by a quarter in his city this year because undocumented

² *The 287(g) Program: An Overview*, American Immigration Council (March 15, 2017), <https://www.americanimmigrationcouncil.org/research/287g-program-immigration>

³ Lise Olsen, *18 Texas sheriffs step up to replace Harris County in Trump's deportation push*, HOUSTON CHRONICLE, Mar. 28, 2017, available at <http://www.houstonchronicle.com/news/houston-texas/houston/article/18-Texas-sheriffs-step-up-to-replace-Harris-11028107.php>

⁴ Mai Thi Nguyen and Hannah Gill, *The 287(g) Program: The Costs and Consequences of Local Immigration Enforcement in North Carolina Communities*, University of North Carolina at Chapel Hill, The Latino Migration Project (2010) at 33, available at https://isa.unc.edu/files/2012/06/287g_report_final.pdf

⁵ KTRK, "Fort Bend County won't join ICE 287g program, Sheriff Says." ABC13 EYEWITNESS NEWS, Aug. 3, 2017, available at: <http://abc13.com/sheriff-fort-bend-co-wont-join-ice-287g-program/2270683/>

⁶ Nik Theodore, *Insecure Communities; Latino Perceptions of Police Involvement in Immigration Enforcement*, at i (2013), https://www.policylink.org/sites/default/files/INSECURE_COMMUNITIES_REPORT_FINAL.PDF

⁷ Brooke A. Lewis, "HPD chief announces decrease in Hispanics reporting rape and violent crimes compared to last year." HOUSTON CHRONICLE, Apr. 5, 2017, <http://www.houstonchronicle.com/news/houston-texas/houston/article/HPD-chief-announces-decrease-in-Hispanics-11053829.php?t=eb46b3d100438d9cbb&cmpid=twitter-premium>

immigrants feared deportation when they interacted with police or testified in court.⁸ He asked his city to “[i]magine, a young woman, imagine your daughter, your sister, your mother . . . not reporting a sexual assault, because they are afraid that their family will be torn apart.”⁹

Such staggering decreases in civilian cooperation hamper core police work and pose serious public safety concerns. A recent study from the University of Tampa analyzed the effects of 287(g) program implementation in Frederick County, Maryland and found that “the program led to a significantly higher number of arrests of Hispanics by the Sheriff’s Office than would have occurred in its absence, indicating that attention was focused toward the Hispanic community as a result of the program.”¹⁰ Exacerbating the concerns to public safety is the reality that the program is not effective: many of the people targeted by 287(g) programs pose no threat to public safety and have no criminal record. The Migration Policy Institute found that “the [287(g)] program is not targeted primarily or even mostly toward serious offenders.”¹¹ We are not alone in this concern: leading law-enforcement voices¹² agree with our opposition to the entanglement of immigration enforcement with local policing.

287(g) programs expose Williamson County to costly legal liability.

The 287(g) program also leads to racial profiling and constitutional violations. The DHS Inspector General has documented in three separate reports extensive police misconduct as a result of the 287(g) program, “claims of civil rights violations have surfaced in connection with several [law enforcement agencies] participating in the program.”¹³ A clear example of this is Arizona’s Maricopa County. An investigation by the Department of Justice concluded that the Maricopa County Sheriff’s Office (MCSO) “engage[d] in a pattern or practice of unconstitutional policing. Specifically, . . . that MCSO, through the actions of its deputies, supervisory staff, and command staff, engage[d] in racial profiling of Latinos; unlawfully stop[ped], detain[ed], and arrest[ed] Latinos; and unlawfully retaliate[d] against individuals who complain about or criticize MCSO’s policies or practices . . .”¹⁴ The successful legal challenge to this racial profiling embroiled the county in costly, multi-year litigation. This risk only compounds the harm that such collaboration brings to communities.

⁸ James Queally, “Latinos are reporting fewer sexual assaults amid a climate of fear in immigrant communities, LAPD says.” Los Angeles Times (Mar. 21, 2017), <http://beta.latimes.com/local/lanow/la-me-ln-immigrant-crime-reporting-drops-20170321-story.html>

⁹ *Id.*

¹⁰ Michael Coon, *Local Immigration Enforcement and Arrests of the Hispanic Population*, *Journal on Migration and Human Security* (2017), 646, <http://jmhs.cmsny.org/index.php/jmhs/article/view/102>

¹¹ Migration Policy Institute, *Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement* 58 (2011), <https://www.migrationpolicy.org/research/delegation-and-divergence-287g-state-and-local-immigration-enforcement>, 2.

¹² Statement of Chief J. Thomas Manger, Chairman of the Legislative Committee for the Major Cities Chiefs Association, “*Examining 287(g): The Role of State and Local Law Enforcement in Immigration Law.*” House Committee on Homeland Security (Mar. 4, 2009), available at <https://www.gpo.gov/fdsys/pkg/CHRG-111hhrg49374/html/CHRG-111hhrg49374.htm>

¹³ Department of Homeland Security, Office of Inspector General, *The Performance of the 287(g) Agreements*, at 22-25 (March 2010) https://www.oig.dhs.gov/assets/Mgmt/OIG_10-63_Mar10.pdf

¹⁴ US Department of Justice, Civil Rights Division, *United States’ Investigation of the Maricopa County Sheriff’s Office*, (Dec 15, 2011) https://www.justice.gov/sites/default/files/crt/legacy/2011/12/15/mcso_findletter_12-15-11.pdf

Given the multitude of financial and other costs of 287(g) programs and the minimal benefits they bring, we call on the County to follow Harris County and Fort Bend County's examples and reconsider its entanglement with federal immigration enforcement programs like 287(g).

We would like to schedule a meeting with your staff in order to discuss these concerns in person. Thank you for your consideration.

Respectfully submitted,



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