

Congress of the United States
House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5074
MINORITY (202) 225-5051
<https://oversight.house.gov>

MEMORANDUM

TO: Committee on Oversight and Government Reform Majority Members

FROM: Committee Staff

DATE: March 26, 2026

RE: Update on the Committee’s Investigation and Findings on Sanctuary Jurisdictions

INTRODUCTION

The House Committee on Oversight and Government Reform undertook an investigation in the 119th Congress to examine how sanctuary jurisdiction policies impact federal immigration enforcement, public safety, and American taxpayers. The Committee’s investigation reveals that sanctuary policies have created a national public safety crisis and imposed a significant financial burden for working families. Across the country, dangerous criminal aliens are being released back into American communities because sanctuary jurisdictions refuse to cooperate with federal immigration authorities. At the same time, these jurisdictions provide expansive benefits and services that attract additional illegal immigration, compounding the danger to safety and taxpayer burden.

The scale of this crisis is staggering. The rapid influx of illegal aliens resulting from the open-border policies of the Biden-Harris Administration eroded public safety and community health nationwide. Rather than take measures to address these harms, left-wing sanctuary jurisdictions have responded by implementing a complex web of laws, ordinances, policies, and executive orders to prevent cooperation between state and local law enforcement entities and U.S. Immigration and Customs Enforcement (ICE). Moreover, many of these jurisdictions have simultaneously expanded benefits and services that attract additional illegal immigration to those jurisdictions and the U.S. at large.

Over the course of the 119th Congress, the Committee conducted oversight that included issuing demands for and reviewing documents and communications from key sanctuary jurisdictions, conducting briefings with federal agencies, receiving disclosures from victims and survivors of illegal alien crime, and holding full Committee hearings with key leaders of sanctuary jurisdictions around the country.

On January 27, 2025, the Committee sent letters to mayors of Chicago, New York City, Boston, and Denver—where defiance of federal immigration law has been especially egregious—seeking documents and communications related to their cities’ sanctuary status. On

March 5, 2025, the Committee held a hearing where those four mayors testified regarding their city sanctuary policies and practices. The Committee then turned its focus from municipal to state governments. On April 10, 2025, the Committee sent letters to the governors of three sanctuary states who have taken extraordinary measures to attract illegal immigration and protect illegal immigrants from federal law enforcement: Illinois, New York, and Minnesota. On June 12, 2025, the Committee conducted an oversight hearing where those three governors testified regarding their states' radical, dangerous resistance to commonsense immigration enforcement.

In the background of the Committee's hearing with sanctuary state governors, violent riots broke out in Los Angeles in early June, fueled by agitators attempting to frustrate the work of federal immigration officials. On June 13, 2025, the Committee sent requests to Los Angeles Mayor Karen Bass and California Governor Gavin Newsom, seeking documents and communications relating to these officials' roles in supporting or encouraging the riots.

Throughout these efforts, the Committee's Subcommittee on Federal Law Enforcement has pursued complementary investigations into the public safety, humanitarian, and law enforcement impacts of sanctuary policies. On May 14, 2025, the Subcommittee hosted a roundtable with frontline state and local police officers to address, among other pressing law enforcement concerns, sanctuary jurisdictions' noncompliance with federal immigration law. On July 23, 2025, the Subcommittee held a hearing to highlight the crisis of unaccompanied alien children, casting light on the hundreds of thousands of minors who have been lost in the federal immigration system. The plight of these children is directly attributable to the anonymity afforded by sanctuary jurisdictions and the radical immigration policies of the former Biden-Harris Administration.

The information obtained from these hearings, review of documents produced to the Committee to date, and accounts of victims of illegal alien crime form the foundation of the observations contained in this update memorandum.

This memorandum details the multifaceted harm caused by sanctuary policies. It examines the public safety crisis created when jurisdictions refuse to honor federal immigration detainers, forcing ICE officers to apprehend criminal aliens in communities rather than safe and controlled custodial environments, while documenting increased dangers to law enforcement, the public, and unaccompanied alien children. The report analyzes the crushing fiscal burden sanctuary policies impose on taxpayers at all levels of government, including sanctuary jurisdictions spending enormous sums on services for illegal immigrants despite struggling with crumbling budgets. Finally, the report discusses the specific paths sanctuary jurisdictions take to obstruct federal immigration enforcement, and examines the Trump Administration's efforts to combat these jurisdictions' obstructive efforts.

The evidence compiled in this investigation underscores that sanctuary policies create perverse incentives that encourage illegal immigration, endanger public safety, and impose unsustainable costs on American taxpayers. These impacts reiterate the need for further legislation to restore effective immigration enforcement and ensure that state and local governments cannot continue to obstruct federal law and endanger public safety with impunity.

KEY FINDINGS

1. Sanctuary jurisdictions protect criminal illegal aliens at the expense of public safety.

- Sanctuary jurisdictions ignore lawful detainees lodged by federal officials for removable aliens in local custody, refusing to release those aliens—who have been arrested for crimes—in a safe custodial environment to ICE officers.
- Many of these released criminal aliens have become recidivists implicated in further criminal activity, including violent crimes against American citizens, lawful aliens, and other illegal aliens.

2. Taxpayers bear an unsustainable financial burden from sanctuary policies.

- As of the most recent 2022 estimates, the net annual cost of illegal immigration to the United States, even after accounting for any state and federal taxes actually paid by illegal immigrants, is over \$150 billion.¹
- Sanctuary policies drive these costs even higher by expanding benefits and services.

3. Sanctuary policies enable a humanitarian crisis affecting vulnerable children while creating broader public safety threats.

- The Biden-Harris Administration’s permissive illegal alien policies created a humanitarian crisis that left hundreds of thousands of unaccompanied alien children without proper oversight and vulnerable to exploitation.
- Sanctuary jurisdictions’ refusal to cooperate with federal authorities compounds these risks.

4. Sanctuary policies create easily avoidable operational failures that endanger communities nationwide.

- ICE must expend additional unnecessary resources subsequently locating and arresting dangerous criminal aliens in the communities in which they embed themselves, increasing safety concerns for law enforcement and the public.
- Despite aggressive congressional oversight and substantial efforts by the Trump Administration, sanctuary state governors and sanctuary city mayors continue to obstruct lawful immigration enforcement, creating an environment hostile to the rule of law and public safety.

¹ Ira Mehlman, *New FAIR Report: Annual Costs of Illegal Immigration Soars to \$150.7 Billion a Year*, FED’N FOR AMERICAN IMMIGR. REFORM (April 2023), available at <https://www.fairus.org/new-fair-report-annual-costs-illegal-immigration-soars-1507-billion-year>.

DISCUSSION

Sanctuary jurisdictions are those that “materially impede enforcement of federal immigration statutes and regulations,” especially the enforcement of immigration law in the interior of the United States.² The Department of Justice (DOJ) identifies twelve states, four large counties, and nineteen cities, including the District of Columbia, as sanctuary jurisdictions.³ However, the problem of sanctuary jurisdictions extends far beyond mere public declarations of support for illegal aliens residing within them—it represents a coordinated effort to obstruct federal law enforcement at multiple levels of government.

I. PUBLIC SAFETY CRISIS

a. **The Human Cost: Victims of Preventable Crimes**

The human toll of sanctuary policies is immense, including preventable tragedies that shatter families and communities. Every single crime committed by a criminal alien released because a sanctuary jurisdiction declined to honor an ICE detainer was preventable with common sense immigration enforcement.

These cases demonstrate how sanctuary policies directly endanger public safety. For example, in January 2025, two Illinois women, Katie Abraham and Chloe Polzin, were killed by a drunk driver illegal alien from Guatemala who promptly fled the scene of the crime, failing to render any aid whatsoever. According to the Department of Justice, the perpetrator was in possession of multiple forms of false identification at the time of his arrest.⁴ Illinois’ sanctuary state laws and policies which protect illegal aliens like this man contributed to this preventable tragedy.⁵

Consider also the case of Ever Valles: even under the Obama Administration, ICE issued a detainer for Mr. Valles, an illegal alien in custody in Denver for “car theft and other charges.”⁶ Denver failed to honor the detainer, and Mr. Valles was released under the city’s sanctuary policies on December 20, 2016. Weeks later, he was involved in a robbery and murder.⁷

The scope of criminal activity among illegal aliens in ICE custody reveals the magnitude of the public safety threat. Between October 1, 2024, and May 10, 2025, ICE booked 164,033 illegal aliens. 56,791 of these—a staggering 35%—were booked for committing at least one of a

² See *U.S. Sanctuary Jurisdiction List Following Executive Order 14287: Protecting American Communities From Criminal Aliens*, U.S. DEP’T OF JUSTICE (updated Oct. 31, 2025), available at <https://www.justice.gov/ag/us-sanctuary-jurisdiction-list-following-executive-order-14287-protecting-american-communities>.

³ *Justice Department Publishes List of Sanctuary Jurisdictions*, U.S. DEP’T OF JUSTICE (Aug. 5, 2025), available at <https://www.justice.gov/opa/pr/justice-department-publishes-list-sanctuary-jurisdictions>.

⁴ “DHS Releases Video Honoring Illinois Woman Katie Abraham Who Was Killed by an Illegal Alien Charged with DUI in Hit and Run,” DEP’T OF HOMELAND SECURITY (Aug. 8, 2025), <https://www.dhs.gov/news/2025/08/08/dhs-releases-video-honoring-illinois-woman-katie-abraham-who-was-killed-illegal>.

⁵ *Id.* (quoting Dep’t of Homeland Security Asst. Secretary Tricia McLaughlin).

⁶ William Perry Pendley, *Mayors Will Rue the Day They Celebrated Sanctuary City Status*, WASHINGTON EXAMINER (Jun. 12, 2018, 7:57 PM) available at <https://www.washingtonexaminer.com/opinion/797539/mayors-will-rue-the-day-they-celebrated-sanctuary-city-status/>.

⁷ *Id.*

list of 40 designated serious offenses. Of these:

- 8,064 were booked for assault;
- 1,365 for burglary;
- 7,273 for possession of dangerous drugs;
- 1,340 for fraud;
- 2,005 for larceny;
- 3,276 for sex crimes, including sexual assault and commercialized sex; and
- 1,783 for weapons offenses.⁸

Even more alarming is the number of criminal aliens already in American communities. As of July 21, 2024, there were 662,566 illegal aliens “with criminal histories” free in the United States.⁹ This number only includes criminal aliens known to ICE officials.¹⁰ The true number is undoubtedly higher, as sanctuary jurisdictions actively prevent federal authorities from identifying and tracking criminal aliens in their communities.

b. Unaccompanied Alien Children: A Hidden Humanitarian Crisis

The public safety implications of sanctuary policies extend beyond criminal aliens to include vulnerable children who become lost in a system designed more to facilitate illegal immigration than protect minors. As revealed in a shocking March 25, 2025 report from the DHS Office of Inspector General (OIG), the Biden-Harris Administration’s permissive immigration policies created a humanitarian crisis that left over 233,000 unaccompanied alien children (UACs) without proper legal oversight and vulnerable to exploitation.¹¹ During the Biden years, ICE failed to serve Notices to Appear (NTA) to these children, leaving them without immigration court dates and outside the legal system’s protective framework.

The scale of missing children in the United States is staggering. Over 31,000 unaccompanied alien children were released to sponsor addresses that were blank, undeliverable, or incomplete, while more than 43,000 failed to appear for court hearings and are now effectively missing from federal monitoring.¹² DHS OIG field investigations revealed the dangerous conditions that the Biden-Harris Administration’s rushed placement policies created. Investigators documented UACs placed with sponsors in gang-controlled areas, in rundown apartment complexes, and in dilapidated motels lacking basic amenities.¹³

Sanctuary policies make this crisis worse by preventing the information sharing necessary to protect these vulnerable children. A 2021 Memorandum of Agreement (MOA) between DHS and the Department of Health and Human Services (HHS) eliminated sponsor vetting requirements that

⁸ See “ICE Initial Book-Ins by Criminality and MSC: FY2025 YTD,” U.S. IMMIGR. AND CUSTOMS ENFORCEMENT (May 10, 2025) (on file with Committee staff).

⁹ Letter from Patrick J. Lechleitner, Deputy Director and Senior Official Performing the Duties of the Director, U.S. Immig. & Customs Enforcement, U.S. Dept. of Homeland Sec. to the Hon. Tony Gonzales, Member, U.S. House of Rep. (Sept. 25, 2024).

¹⁰ *Id.*

¹¹ DEP’T OF HOMELAND SEC. OFF. OF INSPECTOR GEN., OIG-25-21, ICE CANNOT EFFECTIVELY MONITOR THE LOCATION AND STATUS OF ALL UNACCOMPANIED ALIEN CHILDREN AFTER FEDERAL CUSTODY (Mar. 25, 2025) at 6.

¹² *Id.* at 5; *id.* at 7.

¹³ *Id.* at 8.

had existed under previous administrations, removing the mandate for HHS to provide biographic and biometric information for all potential sponsors.¹⁴ DHS OIG investigators found that HHS refused to share crucial information with ICE because they feared it could lead to enforcement actions against sponsors who may themselves be in the country illegally.¹⁵ This policy choice prioritized speedy releases and protecting illegal aliens over protecting vulnerable children, raising serious questions about the Biden-Harris Administration's true priorities.

More than 600 UACs released to sponsors between fiscal years 2019-2023 were subsequently arrested in the U.S. for criminal activity.¹⁶ These arrests include serious crimes such as human smuggling operations and violent felonies, including one fatal stabbing case after a UAC was released to a sponsor.¹⁷

c. Criminal Organizations and National Security Threats

Sanctuary policies create operational environments that sophisticated criminal organizations actively exploit. A city's status as a sanctuary jurisdiction incentivizes illegal aliens to unlawfully enter the U.S. in anticipation of receiving protection from the local government. Sanctuary policies often include a prohibition on information sharing with federal immigration authorities, allowing illegal aliens to remain in the cities undetected.¹⁸ The national security implications extend far beyond individual jurisdictions. Criminal aliens use sanctuary jurisdictions as staging areas, knowing they can avoid federal detection while planning operations across state and national borders. Thus, sanctuary jurisdictions make all Americans less safe, even those who live in states and cities that cooperate with federal immigration enforcement. Further, the lack of information sharing and cooperation by sanctuary jurisdictions creates blind spots that sophisticated criminal organizations exploit to smuggle in and traffic drugs, weapons, and human beings across the country.

The controversy regarding Venezuelan gang Tren de Aragua's entrenchment in a Denver-area apartment building exemplifies this threat. According to evidence gathered as part of a local investigation, elements of Tren de Aragua began establishing themselves in the Aurora, Colorado Whispering Pines complex in 2023, using it as a base of operations from which to conduct a range of organized criminal activity, terrorizing apartment residents and the broader community.¹⁹ Among other crimes, Tren de Aragua members living at Whispering Pines were found to have committed flagrant acts of trespass, illegal firearms possession, assaults and battery against apartment residents and management, human trafficking and sexual abuse of minors, kidnapping, and torture.²⁰ The gang

¹⁴ *Id.* at 9.

¹⁵ *Id.*

¹⁶ *Id.* at 4.

¹⁷ *Id.*

¹⁸ *Sanctuary Policies: An Overview*, AMERICAN IMMIGRATION COUNCIL (Oct. 21, 2020), *available at* <https://www.americanimmigrationcouncil.org/research/sanctuary-policies-overview>.

¹⁹ Brian Maass, "Colorado law firm report claims Venezuelan gang has "stranglehold" on apartments, takeover began in 2023," CBS NEWS COLORADO (Sept. 5, 2024), *available at* <https://www.cbsnews.com/colorado/news/colorado-law-firm-report-claims-venezuelan-gang-stranglehold-apartments-takeover-began-2023/>.

²⁰ *Id.*; Emily Crane, "Infamous Colorado apartment complex overrun by Tren de Aragua is ordered shut over 'imminent threat'," N.Y. POST (Jan. 14, 2025), *available at* <https://nypost.com/2025/01/14/us-news/apartment-complex-overrun-by-tren-de-aragua-ordered-to-shut-over-imminent-threat/> (discussing the kidnapping and torture crimes).

further attempted to extort Whispering Pines' property manager for half of all rent collected from residents, attempted to murder the property manager when he attempted to collect rent from them, and stabbed a resident for refusing to pay them "rent" directly.²¹ The gang-fueled anarchy at Whispering Pines ultimately led a judge earlier this year to order the complex's emergency closure to mitigate the "imminent threat" Tren de Aragua's operations there posed to the public.²²

d. Understanding Sanctuary Jurisdictions and Federal Immigration Law

To understand how sanctuary jurisdictions' policies harm the public, it is essential to understand how federal immigration enforcement is supposed to work. An immigration detainer is a request from ICE that asks a federal, state, or local law enforcement agency with custody of an individual to notify ICE as early as possible before they release a removable alien in their custody so that ICE can take custody of that removable alien. Detainers necessarily apply to aliens who are booked into custody because of an arrest.

These are not arbitrary requests: they are made according to well-established law and process, issued by an immigration officer or other officer authorized pursuant to Immigration and Nationality Act § 287(g), and based on an alien's removability. The DHS's detainer authority is codified at 8 CFR § 287.7, and "arises from the Secretary's power under section 103(a)(3) of the [Immigration and Nationality Act (INA)] to provide regulations 'necessary to carry out his authority,' and from ICE's general authority to arrest and detain aliens subject to removal or removal proceedings, pursuant to sections 236, 241, and 287 of the INA."²³ Detainers actually predate references in statute or regulation, and Form I-247 was in use as early as 1952.²⁴

Detainers serve a critical public safety function. They are an important law enforcement tool, as they permit immigration officers to safely assume custody of criminal aliens in a controlled custodial environment, and minimize risks to public safety presented by requiring ICE officers to carry out enforcement actions in unfamiliar territory in communities where there may be risks to the officers or other illegal aliens present subject to enforcement action.²⁵ When sanctuary jurisdictions refuse to honor these detainers, they force ICE officers to track down criminal aliens in the community, creating unnecessary dangers for law enforcement and the public.

e. Sanctuary Policies Drain Law Enforcement Resources

When state jurisdictions decline to honor a detainer, they create both immediate and systemic public safety vulnerabilities. Not only might aliens with serious criminal backgrounds be released before federal authorities properly evaluate them, but the resulting patchwork of

²¹ *Supra*, n.19.

²² Emily Crane, "Infamous Colorado apartment complex overrun by Tren de Aragua is ordered shut over 'imminent threat'," N.Y. POST (Jan. 14, 2025).

²³ See Thomas D. Homan, Acting Dir. of U.S. Immigr. and Customs Enforcement, *Issuance of Immigration Detainers by ICE Immigration Officers*, U.S. IMMIGR. AND CUSTOMS ENFORCEMENT, Policy Number 10074.2, Federal Enterprise Architecture Number: 306-112-002b (March 24, 2017), available at <https://www.ice.gov/sites/default/files/documents/Document/2017/10074-2.pdf>.

²⁴ *Id.*

²⁵ Erik Ortiz, 'Sanctuary' Cities Targeted by ICE in Immigration Raids as Nearly 500 Arrested, NBC NEWS, (Sep. 29, 2017 7:58 AM), available at <https://www.nbcnews.com/storyline/immigration-border-crisis/sanctuary-cities-targeted-ice-immigration-raids-nearly-500-arrested-n805796>.

inconsistent enforcement policies across jurisdictions creates an uneven security landscape where certain areas become perceived safe havens for those seeking to evade immigration enforcement.

This forces ICE to expend additional and unnecessary resources locating and arresting dangerous criminal aliens in the communities in which they embed themselves, increasing safety concerns for law enforcement and the public. Tracking an illegal alien released notwithstanding an ICE detainer request unnecessarily drains law enforcement resources when simple coordination between jurisdictions at the outset would have allowed for a smooth transfer in a safe and controlled custodial setting while ensuring public safety.²⁶ The dangers to federal law enforcement are particularly acute. Even as ICE under the Trump Administration has resumed much-needed enforcement operations, assaults on ICE officers shot up a stunning **830 percent** over the first half of 2025 compared to the same period in 2024—driven in significant part by sanctuary policies that require dangerous community arrests rather than custodial transfers.²⁷

Law enforcement professionals understand the dangers sanctuary policies create. On May 14, 2025, the Subcommittee on Federal Law Enforcement held a roundtable with frontline state and local police officers where the issue of sanctuary state non-cooperation with federal immigration authorities was discussed.²⁸ There, the Superintendent of the Louisiana State Police, Col. Robert Hodges, stated that federal, state, and local law enforcement must cooperate and take steps to allow for seamless communication.²⁹ He further maintained that sanctuary states' failure to honor ICE detainers creates clear and immediate public safety threats, placing “communities at risk.”³⁰ Col. Hodges closed by stressing that Americans “cannot be safe without law enforcement working together at every level across the country.”³¹

II. RESOURCE STRAIN, FISCAL IMPACT, AND TAXPAYER BURDEN

a. Unnecessary Federal Resource Expenditure

Under the Biden-Harris Administration, the federal government spent over \$1.45 billion to reimburse local jurisdictions and nongovernmental organizations providing travel, shelter, and other services to illegal aliens encountered and released by law enforcement components of DHS.³² This massive expenditure represents resources that could have been used for legitimate federal priorities, diverted instead to accommodate the failure of the Biden-Harris

²⁶ “A view from the Frontlines: A Police Week Roundtable on Emerging Issues Facing American Law Enforcement,” HOUSE SUBCOMM. ON FED. LAW ENFORCEMENT (May 14, 2025), <https://oversight.house.gov/roundtable/a-view-from-the-frontlines-a-police-week-roundtable-on-emerging-issues-facing-american-law-enforcement/> at 1:03:47.

²⁷ DHS Announces ICE Law Enforcement are Now Facing an 830 Percent Increase in Assaults,” U.S. DEP’T OF HOMELAND SECURITY (July 15, 2025), <https://www.dhs.gov/news/2025/07/15/dhs-announces-ice-law-enforcement-are-now-facing-830-percent-increase-assaults>.

²⁸ *Supra*, n. 26 at 1:02:22.

²⁹ *Id.* at 1:03:00.

³⁰ *Id.* at 1:03:30.

³¹ *Id.* at 1:06:10.

³² *Emergency Food and Shelter Program*, FEMA (Jun. 26, 2023), available at <https://www.fema.gov/grants/emergency-food-and-shelter-program>; *Shelter and Services Program*, FEMA (Jan. 8, 2025), available at <https://www.fema.gov/grants/shelter-services-program>; and Andrew R. Arthur, *Making Sense of FEMA’s Migrant-Payment Schemes*, CENTER FOR IMMIGRATION STUDIES (Oct. 7, 2024), available at <https://cis.org/Arthur/Making-Sense-FEMAs-MigrantPayment-Schemes>.

Administration’s radical open-border philosophy and complementary sanctuary jurisdiction policies across the country.

The resulting resource strain is particularly acute in immigration enforcement operations. As of September 2024, ICE Enforcement and Removal Operations (ERO) officers were required to monitor more than 7.5 million non-detained cases using roughly 1000 officers across 25 field offices.³³ During one site visit, DHS OIG investigators discovered that just 10 deportation officers were managing 300,000 non-detained cases, including 17,000 UAC cases, meaning each officer was responsible for an average of 30,000 cases annually, providing officers with only three minutes per case per year.³⁴

This resource misallocation had direct operational consequences. The Biden-Harris Administration’s de-prioritization of UAC cases meant that ERO officers focused their limited time on border operations support, fugitive operations, and other activities rather than child protection.

b. Fiscal Strain and Taxpayer Burden

The financial burden on state and local governments has created a crisis that forces painful choices between serving illegal aliens and supporting American citizens. Sanctuary jurisdictions across the country are spending hundreds of millions on services for illegal aliens while cutting essential services for their own residents.

i. Public Services and Fiscal Strain in Sanctuary Cities

As of January 10, 2025, Chicago has spent \$629.9 million in vendor payments connected to its “New Arrivals Mission,” which works to provide services to illegal aliens in Chicago.³⁵ As of December 18, 2024, Chicago has “welcomed” 51,648 illegal aliens to the city.³⁶ Only in recent years, when faced with an influx of illegal aliens similar to what border states have dealt with for years, did Illinois political leaders begin changing their tune on the severity of illegal immigration to the state.³⁷ Calling on then-President Biden in late 2023, Governor Pritzker demanded the federal government do more to assist the state’s struggling illegal alien infrastructure.³⁸ To accommodate the approximately 630,000 illegal aliens in Illinois, in November 2023, Governor Pritzker announced \$160 million to provide job assistance and shelter to illegal aliens in Chicago.³⁹

³³ *Supra*, n.11 at 10.

³⁴ *Id.*

³⁵ City of Chicago, *Cost Dashboard, Vendor Payments – New Arrivals Mission*, CHICAGO.GOV (Jan. 10, 2025), available at <https://www.chicago.gov/city/en/sites/texas-new-arrivals/home/cost-dashboard.html>.

³⁶ City of Chicago, *New Arrivals Situational Awareness Dashboard*, CHICAGO.GOV (Dec. 18, 2024, 1:00 PM), available at <https://www.chicago.gov/city/en/sites/texas-new-arrivals/home/Dashboard.html>.

³⁷ Hannah Meisel, *J.B. Pritzker Urges Joe Biden to Intervene as ‘Untenable’ Pace of Migrants Arriving in Illinois Accelerates*, WTTW PBS (Oct. 3, 2023, 1:18 PM), available at <https://news.wttw.com/2023/10/03/jb-pritzker-urges-joe-biden-intervene-untenable-pace-migrants-arriving-illinois>.

³⁸ *Id.*

³⁹ C.D. Davidsmeyer, *Davidsmeyer Blasts Pritzker for Spending \$638 Million on Chicago’s Migrant Crisis; Reiterates Call to End Sanctuary State*, C.D. DAVIDSMEYER STATE REPRESENTATIVE DIST. 100 (Nov. 16, 2023), available at <https://cddavidsmeyer.org/2023/11/16/davidsmeyer-blasts-pritzker-for-spending-638-million-on-chicagos-migrant-crisis-reiterates-call-to-end-sanctuary-state/>.

It is estimated that the Biden-Harris Administration’s open borders policies, coupled with sanctuary city policies, cost the city of Denver, regional education, and healthcare organizations roughly \$365 million dollars from December 2022 through November 2024.⁴⁰ Denver alone spent \$42 million in 2023 just on food and housing for illegal aliens.⁴¹ In 2023, Denver received “more [illegal aliens] per capita than any other U.S. city.”⁴² Enrollment at Denver schools increased “by more than 3,000 students, creating a budget shortfall of \$17.5 million.”⁴³ Denver made cuts to the Denver Police Department, and is replacing some officers with drones, to offset the costs of aiding illegal aliens.⁴⁴

Between 2022 and August 2024, New York City had received more than 210,000 illegal aliens.⁴⁵ In Fiscal Year 2023 alone, New York City spent \$1.45 billion “to help migrants.”⁴⁶ Those funds were used to provide “shelter, food and services.”⁴⁷ New York City estimates that it “could potentially spend \$12 billion on” illegal aliens from 2022 through Fiscal Year 2025.⁴⁸

In July 2024, Massachusetts’s spending on its shelter system for illegal aliens surpassed \$1 billion per year in costs.⁴⁹ State funds spent on illegal aliens have been going to vendors providing services “with little to no state oversight.”⁵⁰ Massachusetts also extends certain welfare programs to illegal aliens, including “access to at least a basic version of government-subsidized or government-paid healthcare.”⁵¹ Notwithstanding the Massachusetts state government’s policies which encourage illegal immigration, the evidence shows – unsurprisingly – that the ballooning state costs associated with illegal immigration are driven by the sanctuary policies of Boston. Boston’s reputation as a sanctuary city has attracted so many migrants that it has caused the state’s shelter system to nearly collapse.⁵² Illegal immigrants in Boston have so burdened state housing services that the city is not able to serve its homeless American citizens;

⁴⁰ DJ Summers, *UPDATED COSTS: DENVER MIGRANTS*, COMMON SENSE INST. COLORADO (Nov. 26, 2024), available at <https://www.commonsenseinstituteus.org/colorado/research/housing-and-our-community/updated-costs-denver-migrants>.

⁴¹ Alicia A. Caldwell & Michelle Hackman, *Denver is Furious That Washington Can’t Fix the Border*, WALL ST. J. (Feb. 10, 2024, 5:00 AM ET).

⁴² *Id.*

⁴³ *Id.*

⁴⁴ Jackson Walker, *Denver to replace police officers with drones for some 911 calls amid budget cuts*, 13ABC WHAM (May 28, 2024, 5:29 PM).

⁴⁵ Luis Ferré-Sadurní, *What to Know About the Migrant Crisis in New York City*, THE NEW YORK TIMES (Aug. 19, 2024).

⁴⁶ *A Closer Look, Updating the Costs of NYC’s Asylum Seeker Crisis*, NEW YORK CITY (last visited Jan. 23, 2025), available at <https://www.nyc.gov/content/getstuffedone/pages/asylum-seeker-update>.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ State House News Service, *Massachusetts emergency family shelter system costs officially surpass \$1 billion a year*, FALL RIVER REPORTER (July 17, 2024), available at https://fallriverreporter.com/massachusetts-emergency-family-shelter-system-costs-officially-surpass-1-billion-a-year/#google_vignette.

⁵⁰ Cheryl Fiandaca, *Massachusetts pays millions to vendors in migrant crisis with little oversight*, I-Team finds, CBS NEWS (May 3, 2024).

⁵¹ Jessica M. Vaughn, *Massachusetts: A Case Study in Mass Immigration and the Welfare State*, CTR. FOR IMMIGR. STUDIES (July 25, 2024), available at <https://cis.org/Report/Massachusetts-Case-Study-Mass-Immigration-and-Welfare-State>.

⁵² “There’s Nothing Noble about Boston’s Fight to Keep Sanctuary Policies,” FED’N FOR AM. IMMIGR. REFORM (Feb. 26, 2025), <https://www.fairus.org/blog/2025/02/26/theres-nothing-noble-about-bostons-fight-keep-sanctuary-policies>.

the city's many shelters are regularly full with long wait lists, but newly arrived migrants make up about half of the city's sheltered population.⁵³

ii. Illegal Immigration's Strain on the U.S. Healthcare System

Illegal immigration places significant strain on the U.S. healthcare system. According to the Congressional Budget Office, federal and state taxpayers paid more than \$16.2 billion to provide Medicaid-funded emergency services to illegal aliens during the first three years of the Biden-Harris Administration, fueled in large part by the administration's open-border policies.⁵⁴ These costs fall heavily on states and local jurisdictions that must provide emergency care regardless of immigration status under federal law.⁵⁵ Some jurisdictions report dramatic increases, with Denver Health reporting uncompensated care costs doubling from \$60 million in 2020 to \$120 million in 2022.⁵⁶

iii. Taxpayer Burden and Budgetary Impacts in Sanctuary States

The most recent data compiled by the Federation for American Immigration Reform (FAIR) regarding the overall state-by-state costs of illegal immigration to state taxpayers comes from 2023, two years prior to the conclusion of the illegal alien influx under the Biden-Harris Administration.⁵⁷ According to FAIR's estimates, the net cost of illegal immigration to the United States, *even after accounting for state and federal taxes paid by illegal immigrants*, is over \$150 billion.⁵⁸ However, the bulk of overall public expenditures on illegal immigration—nearly two-thirds—are borne not by the federal government, but by state and local jurisdictions.⁵⁹ The principal reason for the ballooning costs on state and local jurisdictions, which amounted to at least \$85 billion in 2023,⁶⁰ is due to sanctuary policies which expand eligibility for public healthcare, higher education, and welfare programs to illegal immigrants.⁶¹

⁵³ *Id.*

⁵⁴ Letter from Phillip L. Swagel, Dir., Cong. Budget Off., to Jodey Arrington, Chairman, H. Comm on the Budget (Oct. 2, 2024), *available at* https://www.cbo.gov/system/files/2024-10/Arrington_Letter_EmergencyMedicaid_Immigration_final.pdf.

⁵⁵ "CBO: Medicaid Spending on Illegal Aliens Has Cost Taxpayers over \$16.2 Billion Under Open Border Czar Harris," U.S. HOUSE COMM. ON THE BUDGET (Oct. 4, 2024), <https://budget.house.gov/press-release/cbo-medicaid-spending-on-illegal-aliens-has-cost-taxpayers-over-162-billion-under-open-border-czar-harris>.

⁵⁶ Autumn Spredemann, *Illegal Immigrants Leave US Hospitals With Billions in Unpaid Bills*, THE EPOCH TIMES (Mar. 14, 2024).

⁵⁷ See "The Fiscal Burden of Illegal Immigration on United States Taxpayers 2023," FED'N FOR AM. IMMIGR. REFORM (2023) (displaying the state-by-state costs of illegal aliens to state taxpayers), https://www.fairus.org/sites/default/files/2023-03/Fiscal%20Burden%20of%20Illegal%20Immigration%20on%20American%20Taxpayers%202023%20WEB_1.pdf, at 40.

⁵⁸ "The Fiscal Burden of Illegal Immigration on United States Taxpayers | 2023 Cost Study," FED'N FOR AM. IMMIGR. REFORM (Mar. 8, 2023), <https://www.fairus.org/issue/publications-resources/fiscal-burden-illegal-immigration-united-states-taxpayers-2023>.

⁵⁹ *Id.*

⁶⁰ See *Supra*, n.57.

⁶¹ *Supra* n.58.

The most recent data compiled by the U.S. Census Bureau for number of households per U.S. jurisdiction comes from 2024.⁶² To provide a rough figure of the cost of illegal immigration in each state per family, one may simply divide FAIR’s estimated state-by-state total cost of illegal aliens by the number of households in each state. Critically, these estimates only account for the additional tax burden sanctuary policies create on states—they do not take the added federal tax burden into account:

Cost of Illegal Immigration per Family in Illinois:

- $\frac{\$2,911,654,025 \text{ (total cost to IL taxpayers)}^{63}}{5,105,448 \text{ (number of IL households)}}^{64} = \sim \underline{\$570.25}$ total annual illegal immigration tax burden per IL family.

Cost of Illegal Immigration per Family in Minnesota:

- $\frac{\$656,934,062 \text{ (total cost to MN taxpayers)}^{65}}{2,363,442 \text{ (number of MN households)}}^{66} = \sim \underline{\$277.96}$ total annual illegal immigration tax burden per MN family.⁶⁷

Cost of Illegal Immigration per Family in New York State:

- $\frac{\$7,400,654,942 \text{ (total cost to NY taxpayers)}^{68}}{7,828,074 \text{ (number of NY households)}}^{69} = \sim \underline{\$945.40}$ total annual illegal immigration tax burden per NY family.

Taxpayers in sanctuary states are not alone in shouldering the added burden caused by sanctuary policies. Due to a variety of factors, including interstate migration, federal resource allocation, and shared national program costs, taxpayers in states that cooperate with federal immigration enforcement find themselves indirectly financing the costs generated by sanctuary policies elsewhere. Applying the same reasoning from the examples above, one can roughly calculate the financial burden families in the following non-sanctuary states must pay to subsidize the radical policies of their sanctuary state neighbors.

Cost of Illegal Immigration per Family in Florida:

- $\frac{\$5,972,788,206 \text{ (total cost to FL taxpayers)}^{70}}{9,141,675 \text{ (number of FL households)}}^{71} = \sim \underline{\$653.36}$ total annual illegal immigration tax burden per FL family.

⁶² See “S1101 | Households and Families – 2024: ACS 1-Year Estimates Subject Tables” U.S. Census Bureau (Accessed: Sept. 15, 2025), <https://data.census.gov/table/ACSST1Y2024.S1101?q=Households+by+state>.

⁶³ See *Supra*, n.57.

⁶⁴ *Supra*, n.62.

⁶⁵ See *Supra*, n.57

⁶⁶ *Supra*, n.62.

⁶⁷ Note: This may be a conservative estimate. According to recent reports, healthcare costs alone for illegal aliens in Minnesota are projected to reach \$600 million over four years – \$400 million more than initially estimated. See Esme Murphy, *The Fight Over Giving Undocumented Minnesotans Health Insurance*, CBS NEWS (Apr. 28, 2025), available at <https://www.cbsnews.com/minnesota/news/minnesota-undocumented-immigrants-health-insurance-debate/>.

⁶⁸ See *Supra*, n.57

⁶⁹ *Supra*, n.62.

⁷⁰ See *Supra*, n.57

⁷¹ *Supra*, n.62.

Cost of Illegal Immigration per Family in Georgia:

- $\frac{\$2,254,644,675 \text{ (total cost to GA taxpayers)}^{72}}{4,220,732 \text{ (number of GA households)}}^{73} = \sim \underline{\$534.18}$ total annual illegal immigration tax burden per GA family.

Cost of Illegal Immigration per Family in Texas:

- $\frac{\$9,942,111,305 \text{ (total cost to TX taxpayers)}^{74}}{11,449,769 \text{ (number of TX households)}}^{75} = \sim \underline{\$868.32}$ total annual illegal immigration tax burden per TX family.

Only in recent years, when faced with an influx of illegal aliens that border states have dealt with for years, have some sanctuary state governors begun changing their tune on the costs of illegal immigration to their own states.⁷⁶

Calling on then-President Biden in late 2023, Illinois Governor JB Pritzker demanded the federal government do more to financially subsidize the state's struggling illegal alien infrastructure with federal taxpayer money.⁷⁷ To accommodate the approximately 630,000 illegal aliens in Illinois, in November 2023, Governor Pritzker announced \$160 million to provide job assistance and shelter to illegal aliens in Chicago.⁷⁸ Similarly, New York Governor Kathy Hochul asked to meet with then President Biden in September 2023, instead securing a meeting with his Chief of Staff discussing how to receive more federal taxpayer funded subsidies or ensure more work permits for illegal aliens to ease the fiscal burden of illegal aliens on the state.⁷⁹ In fact, the State of New York "committed \$4.3 billion in funding for [immigration related] costs statewide in Fiscal Years 2023-24 and 2024-25."⁸⁰ Additionally, after signing a two-year state budget in 2023 granting illegal aliens state-funded health coverage under MinnesotaCare, Governor Tim Walz promptly reversed course by agreeing to Republican demands to strike the provision in the 2025 state budget due to rising costs.⁸¹

⁷² See *Supra*, n.57

⁷³ *Supra*, n.62.

⁷⁴ See *Supra*, n.57

⁷⁵ *Supra*, n.62.

⁷⁶ Hannah Meisel, *J.B. Pritzker Urges Joe Biden to Intervene as 'Untenable' Pace of Migrants Arriving in Illinois Accelerates*, WTTW PBS (Oct. 3, 2023, 1:18 PM), available at <https://news.wttw.com/2023/10/03/jb-pritzker-urges-joe-biden-intervene-untenable-pace-migrants-arriving-illinois>.

⁷⁷ *Id.*

⁷⁸ C.D. Davidsmeyer, *Davidsmeyer Blasts Pritzker for Spending \$638 Million on Chicago's Migrant Crisis; Reiterates Call to End Sanctuary State*, C.D. DAVIDSMEYER STATE REPRESENTATIVE DIST. 100 (Nov. 16, 2023), available at <https://cddavidsmeyer.org/2023/11/16/davidsmeyer-blasts-pritzker-for-spending-638-million-on-chicagos-migrant-crisis-reiterates-call-to-end-sanctuary-state/>.

⁷⁹ The National Desk, *Expert: Gov. Hochul is 'asking for more U.S. taxpayer dollars to manage migrant crisis'*, ABC 15 NEWS (Sept. 5, 2023).

⁸⁰ Asylum Seeker Funding Tracker, *NYC's Humanitarian Crisis Response*, NYC MAYOR'S OFF. OF MGMT. & BUDGET (last visited Jan. 29, 2025), available at <https://www.nyc.gov/site/omb/as-fund-tracker.page>.

⁸¹ Dana Ferguson & Laura Fitzgerald, *These Democratic governors are trying to curb health care for unauthorized immigrants*, WBHM NPR (May 18, 2025), <https://wbhm.org/npr-story/these-democratic-governors-are-trying-to-curb-health-care-for-unauthorized-immigrants/> (discussing illegal aliens' coverage in the state 2023 budget under MinnesotaCare and Gov. Walz's negotiations with state Republicans to end medical coverage of illegal aliens); "Governor Walz Signs Two-Year State Budget," OFF. OF GOV. TIM WALZ & LT. GOV. PEGGY FLANAGAN (June 14, 2025), <https://mn.gov/governor/newsroom/press-releases/?id=1055-693643> (noting that Gov. Walz signed the 2025 budget into law with the MinnesotaCare modification excluding illegal immigrants from coverage).

III. THE STATE OF SANCTUARY JURISDICTIONS IN AMERICA

To tailor its investigation and illustrate this nationwide problem in microcosm, the Committee focused its March 5, 2025, sanctuary cities hearing on four cities whose defiance of federal immigration enforcement has been particularly egregious: Chicago, New York City, Boston, and Denver. Similarly, for its June 12, 2025, oversight hearing on sanctuary states, the Committee focused on three of the worst offenders: Illinois, New York State, and Minnesota.

a. The Scale of Immigration Non-Compliance across America

To appreciate the scale of obstruction by sanctuary jurisdictions, it is useful to consider the detainer refusals in the four cities the Committee highlighted in its investigation. According to ICE Enforcement and Removal Operations (ERO) data provided to Committee Staff, in Fiscal Year 2024, which includes enforcement activities under the Biden-Harris Administration, state and local law enforcement agencies within the following Areas of Responsibility (AORs) and cities declined:

- 752 detainees in the Chicago Field Office AOR, with 335 of those declined by the City of Chicago itself;
- 168 detainees in the Denver Field Office AOR, with 124 of those declined by the City of Denver;
- 284 detainees in the New York City Field Office AOR, with 127 of those declined by the City of New York (Manhattan); and
- 1,225 detainees in the Boston Field Office AOR, with 254 of those declined by the City of Boston.⁸²

Contrasting this data with that from a sampling of non-sanctuary cities below helps quantify the divide between jurisdictions that comply with federal immigration law, and those that flaunt it:

- 38 detainees in the Phoenix, Arizona Field Office AOR, with 8 of those declined by the City of Phoenix;
- 127 detainees in the El Paso, Texas Field Office AOR, with 42 of those declined by the City of El Paso; and
- 169 detainees in the Miami, Florida Field Office AOR, with 17 of those declined by the City of Miami.⁸³

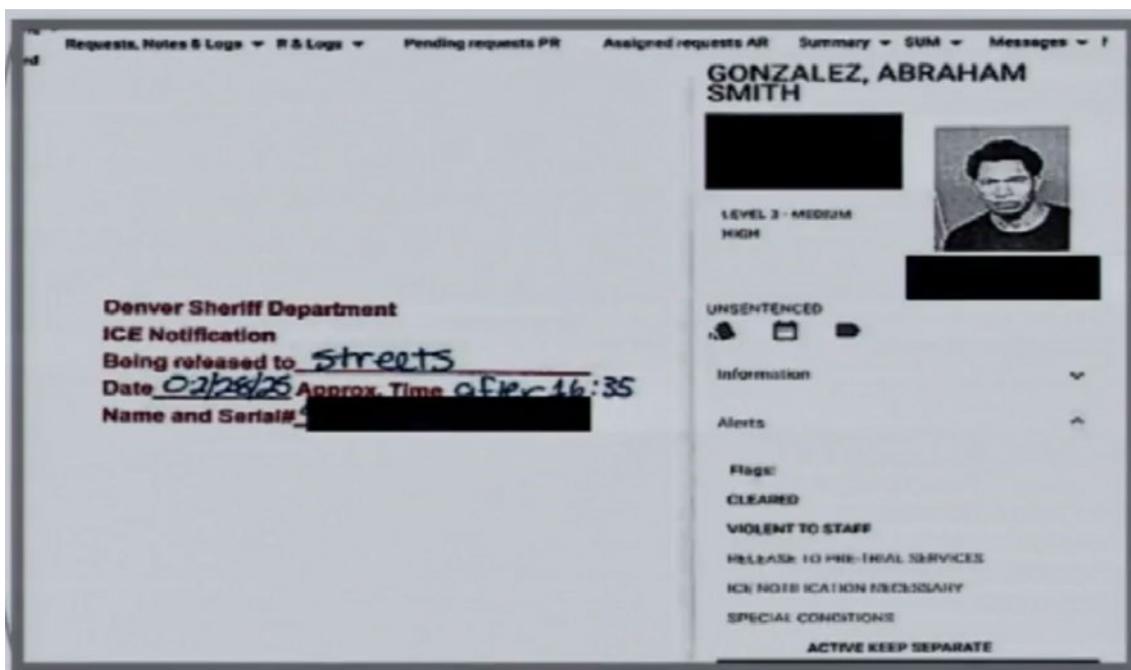
The numbers tell a clear story. The figures from the four sanctuary cities the Committee profiled in its investigation represent thousands of missed opportunities to safely transfer

⁸² Fiscal Year 2024 ICE Enforcement and Removal Operations (ERO) detainer refusal data (on file with Committee Staff).

⁸³ *Id.*

criminal aliens to federal custody, instead releasing them back into local communities. Oftentimes, in addition to outright declining detainee requests, sanctuary cities will provide immigration officials only nominal warning before releasing violent criminals onto the streets.

On February 8, 2025, Abraham Gonzalez, an illegal Venezuelan immigrant and suspected Tren de Aragua gang member, was released by the Denver County jail after first-degree murder charges against him were inexplicably dropped.⁸⁴ On March 26, 2024, ICE sent Denver officials a detainer requesting 48 hours' advance notice should the city eventually release him from custody.⁸⁵ Rather than honoring this request, Denver officials provided ICE merely one hour of notice prior to Gonzalez's release and did not permit them to take custody of him in the jail.⁸⁶ This resulted in Gonzalez fleeing from ICE agents on foot and assaulting one of them in the process.



Above: Denver Sheriff Department's "advance" notification to ICE of Abraham Gonzalez's release, provided merely one hour before being "released to streets."

⁸⁴ Oversight Committee (@GOPoversight), X (Mar. 5, 2025, 11:49 AM), <https://x.com/GOPoversight/status/1897328533447336405> (video statement of Rep. Jim Jordan); Chris Vanderveen, "Denver's mayor says 'adjustments' might be necessary after alleged assault of ICE outside county jail," 9 NEWS NBC (Mar. 5, 2025), <https://www.9news.com/article/news/politics/denvers-mayor-adjustments-alleged-assault-ice-agent-county-jail/73-bcb319f9-de5c-4a70-93f5-a2371a9edc3d>.

⁸⁵ Oversight Committee (@GOPoversight), X (Mar. 5, 2025, 11:49 AM), <https://x.com/GOPoversight/status/1897328533447336405> (video statement of Rep. Jim Jordan).

⁸⁶ *Id.*



Above: Feb. 28, 2025 footage showing illegal alien TdA gang member Abraham Gonzalez fleeing from ICE agents following Denver’s refusal to honor a detainer request to hold him.

The incident involving Abraham Gonzalez is not an isolated case, but a reflection of a national trend among leftist jurisdictions to obstruct common-sense immigration enforcement, even at the risk of public safety. Last April, ICE officers in Herndon, Virginia were forced to track down and arrest Marvin Mateo-Alberto, an illegal alien from Honduras accused of incest with a 13 to 17-year-old child and aggravated sexual battery, after the Fairfax County Adult Detention Center ignored an ICE detainer request and released him to the streets in January. To put a fine point on it: this sex predator was lurking everyday neighborhoods of Northern Virginia for **nearly three months** following his release by local police before ICE was able to track him down.⁸⁷ Rather than simply honor ICE’s detainer request, Fairfax County unnecessarily allowed an accused child predator back on the streets. Thanks to the malicious negligence of Fairfax County’s sanctuary policies, we may never know what other horrific crimes Marvin Mateo-Alberto committed during his months on the lam from federal law enforcement.

b. Sanctuary Laws and Policies in Focus

The principal tactic used by sanctuary jurisdictions throughout the Committee’s investigation has been to simply deny that they are, in fact, sanctuary jurisdictions. As demonstrated through testimony before the Committee, sanctuary city mayors and sanctuary state governors publicly insist that they would cooperate with ICE requests for custodial transfers of illegal aliens, if—crucially—ICE first tenders a *judicial criminal warrant* as opposed to an administrative warrant authorized by statute.⁸⁸

⁸⁷ Nick Minock, “ICE says Fairfax County and DC are rejecting detainers, releasing violent offenders,” ABC 7 NEWS (Apr. 14, 2025), <https://wjla.com/news/local/washington-dc-maryland-northern-virginia-ice-detainers-fairfax-county-violent-offenders-ero-us-illegaly-child-sex-crimes-arrest-operation-field-office-mayor-office>.

⁸⁸ See *A Hearing with Sanctuary City Mayors: Hearing Before H. Comm. on Oversight and Gov’t Reform*, 119th Cong. 119-11 (Mar. 5, 2025), <https://www.congress.gov/event/119th-congress/house-event/LC74198/text> (showing how three mayors insist that their jurisdictions do cooperate with ICE if specifically presented with a “criminal warrant”).

Immigration enforcement in the interior of the country is governed by the Immigration and Nationality Act (INA), a federal statute contained in Title 8 that explicitly provides immigration officers conducting immigration enforcement with the authority to issue administrative warrants that typically accompany detainer requests. In relevant part, the INA states that “[o]n a warrant issued by the Attorney General [now the Secretary of Homeland Security], an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States.”⁸⁹ The implementing regulations delegate the authority to issue administrative immigration warrants of removal to various immigration officials.⁹⁰ The U.S. Supreme Court has, *for more than half a century*, declined to disturb immigration officers’ longstanding power of arrest using an administrative warrant authorized by statute.⁹¹ Furthermore, ICE law enforcement officers are also authorized by statute to make *warrantless* arrests for a broad variety of reasons, including for: violation of federal immigration law under 8 U.S.C. § 1357(a)(2);⁹² commission of federal felonies under 8 USC § 1357(a)(4);⁹³ and commission of general federal crimes in an ICE LEOs presence under 8 U.S.C. § 1357(a)(5).⁹⁴

Sanctuary jurisdictions therefore erroneously maintain that only judge-issued criminal warrants—despite being completely inapplicable to the immigration enforcement context—are the only document legally sufficient to hold a removable illegal alien. This is not a mere failure by these sanctuary jurisdiction leaders to understand basic principles of the law, but a deliberate effort to intentionally mislead and confuse the public to further the goal of obstructing federal immigration law enforcement efforts.

Beyond their flimsy legal justifications, sanctuary jurisdictions’ obstruction of federal immigration enforcement operates via a complex web of state and local laws, ordinances, and policies designed to hamper cooperation with ICE while attracting as many illegal aliens as possible. Each jurisdiction employs its own unique set of laws, ordinances, policies, and executive orders toward this end, though they often rely on the same basic playbook. First, a formal prohibition on state or local law enforcement from honoring ICE detainer requests or otherwise cooperating with federal immigration officials; second, providing illegal aliens services and privileges reserved for citizens or legal residents, including drivers’ licenses and welfare services; and third, imposing information-sharing restrictions on any local official that might expose an illegal alien to federal officials, even in cases where such information-sharing would potentially save lives during law enforcement emergencies.

⁸⁹ Immigration and Nationality Act [INA] § 236 [8 U.S.C. § 1226].

⁹⁰ See 8 C.F.R. § 241.2(a).

⁹¹ See *Abel v. U.S.*, 362 U.S. 217, 230-234 (1960), *reh. denied* 362 U.S. 984 (1960) (“Statutes providing for deportation have ordinarily authorized the arrest of deportable aliens by order of an executive official. The first of these was in 1798... there remains overwhelming historical legislative recognition of the propriety of administrative arrest for deportable aliens such as petitioner.”).

⁹² 8 U.S.C. § 1357(a)(2).

⁹³ 8 U.S.C. § 1357(a)(4).

⁹⁴ 8 U.S.C. § 1357(a)(5).

i. *State of Illinois*

The State of Illinois is a sanctuary jurisdiction under the Illinois TRUST Act of 2017.⁹⁵ The TRUST Act prohibits state law enforcement from detaining or continuing to detain individuals on the basis of immigration detainers or administrative warrants for removable aliens, restricts communication with federal immigration officials, and explicitly prohibits cooperation with a “[n]on-judicial immigration warrant”, including an “administrative warrant or any other immigration warrant or request that is not approved or ordered by a judge...”.⁹⁶

Governor JB Pritzker doubled down on the TRUST Act, signing several other bills into law in 2021—including the Way Forward Act—which require local jurisdictions within Illinois to end partnerships with ICE, among other measures.⁹⁷ Touting his efforts to enhance protections for illegal aliens, Governor Pritzker recently stated that Illinois law requires state police to “stand up for... law-abiding” illegal aliens, while reiterating that the state government will not cooperate with federal immigration officials.⁹⁸

The Illinois Attorney General has also recently issued guidance to Illinois law enforcement agencies clarifying these restrictions and reminding them of legal obligations to assist foreign nationals and immigrant crime victims.⁹⁹

ii. *State of Minnesota*

The State of Minnesota is a sanctuary jurisdiction under an erroneous interpretation of law. Specifically, Minnesota Attorney General Keith Ellison recently issued a formal legal opinion stating that holding an illegal alien pursuant to an ICE detainer request would constitute an unreasonable seizure under both the Fourth Amendment to the U.S. Constitution and Article 1, Section 10 of the Minnesota Constitution.¹⁰⁰

⁹⁵ Illinois TRUST Act, 5 Ill. Comp. Stat. 805 (2017).

⁹⁶ *Compare id.* at § 10 to INA § 236(a) [8 U.S.C. § 1226(a)] (authorizing the issuance of administrative warrants for the arrest and detention of aliens to be removed from the United States).

⁹⁷ Press Release: *Gov. Pritzker Signs Legislation Further Establishing Illinois as the Most Welcoming State in the Nation*, ILLINOIS.GOV (Aug. 2, 2021).

⁹⁸ Ryan King, *Pritzker vows to ‘stand in way’ of certain Trump deportation policies, protect ‘law-abiding’ illegal migrants*, N.Y. POST (Jan. 26, 2025).

⁹⁹ “Guidance: Illinois Laws Governing Law Enforcement Interactions with Immigrant Communities,” OFF. OF ILL. ATT’Y GEN. KWAME RAOUL (Updated: Jan. 2025), <https://www.illinoisattorneygeneral.gov/Page-Attachments/ImmigrationLawGuidanceToLawEnforcement.pdf>.

¹⁰⁰ See “*Re: Request for Advisory Opinion Pursuant to Minn. Stat. § 8.07*,” THE OFF. OF MINN. ATT’Y GEN. KEITH ELLISON (Feb. 6, 2025).

Minnesota law prohibits state and local law enforcement agencies from holding someone based on an immigration detainer if the person would otherwise be released from custody. Minn. Stat. §§ 629.30; .34

3-a



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...

SUMMARY OF CONCLUSION

Minnesota law prohibits state and local law enforcement agencies from holding someone based on an immigration detainer if the person would otherwise be released from custody.

Above: Excerpts from Attorney General Ellison's February 6, 2025, Advisory Opinion.

Governor Tim Walz engaged in rhetoric and efforts to make Minnesota an attractive destination for illegal aliens. In 2023, Governor Walz signed legislation expanding eligibility to illegal aliens for state sponsored healthcare,¹⁰¹ Minnesota driver's licenses,¹⁰² and free college tuition.¹⁰³ Governor Walz also stated that local law enforcement should only be responsible for "state and local laws, not federal immigration laws"¹⁰⁴ ignoring the reality that criminal illegal aliens create public safety risks in Minnesota and elsewhere.

The Minnesota Driver's Licenses for All Act, effective October 1, 2023, is of particular concern for purposes of federal law enforcement. Under the Act, Minnesota's Department of Public Safety's Driver and Vehicle Services (DVS) is prohibited from disclosing information contained in license or identification card applications for purposes of enforcing Title 8 of the United States Code, with limited exceptions.¹⁰⁵ This law enables illegal aliens to obtain driver's licenses and identity cards by expanding acceptable identity documents and eliminating requirements for Social Security numbers or proof of lawful presence.¹⁰⁶ ICE officers and agents face potential civil and criminal liability for accessing DVS records for immigration enforcement

¹⁰¹ Tom Crann and Ngoc Bui, *MinnesotaCare expands eligibility to Minnesotans with undocumented status*, MPR NEWS (June 5, 2023).

¹⁰² *Governor Walz Signs Bill Expanding Access to Driver's Licenses*, OFF. OF GOV. TIM WALZ & LT. GOV. PEGGY FLANAGAN (Mar. 7, 2023).

¹⁰³ Tom Kertscher, *Did Tim Walz support free college education for some undocumented immigrants?*, WISCONSIN WATCH (Aug. 7, 2024).

¹⁰⁴ Jennie Taer, "Sanctuary state" Gov. Tim Walz gave illegal migrants taxpayer-funded health care, tuition, driver's licenses, N.Y. POST (Aug. 6, 2024).

¹⁰⁵ H.F. 4, 93d Leg., Reg. Sess. (Minn. 2023),

https://www.revisor.mn.gov/bills/text.php?number=HF4&version=4&session=ls93&session_year=2023&session_number=0&format=pdf.

¹⁰⁶ *Id.*

purposes. These restrictions have demonstrably delayed investigations according to ICE officials.¹⁰⁷

Despite these actions, and with the operation of Attorney General Ellison’s advisory opinion in Minnesota, Governor Walz claimed in testimony before the Committee on June 12, 2025, that “Minnesota is not a sanctuary state...” but then clarified that Minnesota only complies with requests from DHS “when they are backed by a judicial warrant, issued by an Article III court...”¹⁰⁸

Governor Walz’s testimony in fact reveals that he supports sanctuary jurisdiction policies. As outlined earlier in this report, immigration officers lawfully carry out their statutory duties with the powers of administrative warrants, and the imposition of an irrelevant requirement to obtain a judicial warrant to enforce immigration law is an obstructive tactic by sanctuary jurisdictions to decline to honor lawful detainees.

iii. State of New York

The State of New York is a sanctuary jurisdiction under Executive Order No. 170, signed by former Governor Andrew Cuomo.¹⁰⁹ Executive Order 170 directs that “[n]o State officers or employees, including law enforcement officers, shall disclose information to federal immigration authorities for the purpose of federal civil immigration enforcement, unless required by law.”¹¹⁰ Governor Kathy Hochul has endorsed her predecessor’s efforts to enact sanctuary policies, calling New York counties cooperating with ICE “renegade counties” while insisting that state police under her control “will not cooperate” with federal officials to detain illegal aliens.¹¹¹

The 2019 Driver's License Access and Privacy Act (known as the “Green Light Law”) allows aliens to obtain valid New York drivers' licenses without providing Social Security numbers.¹¹² This law restricts ICE's access to DMV databases, impeding officers' ability to confirm identities, locate subjects with criminal histories, run license plate searches, and access vehicle registration information. Before this law, ICE utilized DMV data extensively to combat transnational gangs, narcotics smuggling, human trafficking, weapons trafficking, child exploitation, and fraud.

The so-called Protect Our Courts Act (POCA), signed December 15, 2020, prevents ICE from arresting aliens in New York state, city, or municipal courthouse properties without judicial warrants.¹¹³ The law broadly protects individuals attending court proceedings as parties or potential witnesses, along with their family members, while going to, remaining at, and returning

¹⁰⁷ “U.S. Immigration and Customs Enforcement Response to a Request for Sanctuary Jurisdiction Briefing Materials for New York, Minnesota, and Illinois,” U.S. IMMIGR. AND CUSTOMS ENFORCEMENT (May 2025), at 8 (on file with Committee staff).

¹⁰⁸ See *A Hearing with Sanctuary Governors: Hearing Before H. Comm. on Oversight and Gov’t Reform*, 119th Cong. (Jun. 12, 2025), Testimony of Governor Tim Walz, available at, <https://oversight.house.gov/wp-content/uploads/2025/06/Walz-Written-Testimony.pdf>.

¹⁰⁹ Executive Chamber, Executive Order No. 170, State of New York (Sept. 15, 2017).

¹¹⁰ *Id.*

¹¹¹ Chris Wade, *Hochul blasts ‘renegade’ New York counties for cooperating with ICE*, THE CENTER SQUARE (Mar. 25, 2025).

¹¹² A.B. 3675, 2019-2020 Leg., Reg. Sess. (N.Y. 2019), <https://legislation.nysenate.gov/pdf/bills/2019/A3675B>.

¹¹³ S.B. 425A, 2019-2020 Leg., Reg. Sess. (N.Y. 2019), <https://legislation.nysenate.gov/pdf/bills/2019/S425A>.

from court. POCA allows civil immigration enforcement only in limited circumstances involving national security threats or imminent risks of harm, while creating potential criminal and civil consequences for officers who violate its provisions.

iv. *City of Chicago*

Chicago is a sanctuary jurisdiction under Chapter 2-173 Welcoming City Ordinance and the Illinois Trust Act.¹¹⁴ The Welcoming City Ordinance prevents local officials from arresting, detaining, or continuing to detain illegal aliens subject to “an administrative warrant entered into the Federal Bureau of Investigation’s National Crime Information Center database” or “immigration detainees.”¹¹⁵ Mayor Brandon Johnson recently “reaffirmed” his commitment to keep Chicago a sanctuary city.¹¹⁶ Mayor Johnson has been vocal against the Trump Administration’s efforts to enforce federal immigration law, calling efforts to deport illegal criminals “unconscionable and dangerous,” while calling President Trump a “tyrant.”¹¹⁷ Mayor Johnson has gone so far as to say he would work to stop the arrival of federal immigration agents in Chicago.¹¹⁸

v. *City of Denver*

Denver is a sanctuary jurisdiction under Colorado law,¹¹⁹ and Mayor Mike Johnston confirmed that he was prepared to go to jail to protect illegal aliens from federal immigration authorities.¹²⁰ In 2017, the Denver City Council passed an ordinance that prohibits city and county employees from assisting in the enforcement of federal immigration laws or inquiring about a person’s immigration status. The ordinance restricts ICE from using city or county property to carry out immigration enforcement operations and prohibits the “use of city resources or City cooperation with civil immigration enforcement, including prohibiting providing access to secure areas or facilities.”¹²¹ Also in 2017, then-Denver Mayor Michael Hancock signed an

¹¹⁴ See CHICAGO, ILL., MUNICIPAL CODE, Ch. 2-173, Welcoming City Ordinance, (accessed Jan. 29, 2025), available at

<https://www.chicago.gov/content/dam/city/depts/mayor/Office%20of%20New%20Americans/PDFs/WelcomeCityOrdinance.pdf>; and see also *Rights of the People, Civil Rights, Defending Immigration Rights*, OFFICE OF THE ILLINOIS ATTORNEY GENERAL KWAME RAOUL (accessed Jan. 29, 2025), available at <https://illinoisattorneygeneral.gov/rights-of-the-people/civil-rights/immigration/>.

¹¹⁵ CHICAGO, ILL., MUNICIPAL CODE, *supra* n.113; and Immigration Detainers, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (Jan. 28, 2025), available at <https://www.ice.gov/immigration-detainers>.

¹¹⁶ A Martínez & Obed Manuel, *Chicago Immigrant Residents are in Trump’s Sights. The Mayor Says He’ll Defend Them*, 90.5 WESA (Jan. 21, 2025, 4:04 AM), available at <https://www.wesa.fm/2025-01-21/chicago-immigrant-residents-are-in-trumps-sights-the-mayor-says-hell-defend-them>.

¹¹⁷ Heather Cherone, *Chicago Will Remain a Sanctuary City, Despite Donald Trump’s Threats, Mayor Brandon Johnson Says*, WTTW PBS (Nov. 12, 2024, 4:37 PM), available at <https://news.wttw.com/2024/11/12/chicago-will-remain-sanctuary-city-despite-trump-s-threats-mayor-brandon-johnson-says>.

¹¹⁸ *Id.*

¹¹⁹ HB19-1124, Protect Colorado Residents from Federal Government Overreach, 2019 Regular Session (Mar. 28, 2019), available at <https://leg.colorado.gov/bills/hb19-1124>.

¹²⁰ See Adam Shaw, *Denver Mayor Says He’s Prepared to Go to Jail Over Opposition to Trump Deportations of Illegal Immigrants*, FOX NEWS (Nov. 25, 2024, 12:46 PM), available at <https://www.foxnews.com/politics/denver-mayor-says-hes-prepared-go-jail-over-opposition-trump-deportations-illegal-immigrants>.

¹²¹ Faith Miller, *Report: Ice Plans to Target Denver, Other ‘Sanctuary Cities’ for Immigration Enforcement*, COLORADO NEWSLINE (Oct. 1, 2020, 11:34 AM), available at <https://coloradonewsline.com/2020/10/01/report-ice-plans-to-target-denver-other-sanctuary-cities-for-immigration-enforcement/>; and Denver City Council, Legislation, Bill No. 17-0940 (became law Aug. 31, 2017), available at

executive order establishing a legal defense fund to support individuals facing deportation, who, unlike criminal defendants, are not guaranteed free legal representation.¹²²

In 2019, the Colorado General Assembly enacted the “Protect Colorado Residents from Federal Government Overreach” law, which effectively banned local law enforcement from honoring ICE immigration detainers.¹²³ The law also prevents probation officers and probation department staff from sharing individuals' personal information with federal immigration authorities.¹²⁴ Denver has received more than 41,000 illegal aliens over the past two years due to its sanctuary status.¹²⁵

After President Trump's victory in the 2024 presidential election, Mayor Johnston initially supported directing Denver Police officers to block federal law enforcement at the Denver County line.¹²⁶ After walking back that stance, he encouraged support for civil protests against deportations.¹²⁷ Since then, Mayor Johnston continued to adjust his stance as the new administration takes office. In a recent interview, he clarified his position, saying, "I think our line is clear. If you are a violent criminal committing serious crimes like murder or rape in Denver, you should be prosecuted to the fullest extent of the law and deported. We support that, and we have always supported that. We've worked with previous administrations on this, and we will continue to do so moving forward."¹²⁸

vi. *New York City*

New York City is a sanctuary jurisdiction under several city code provisions generally prohibiting law enforcement from honoring an immigration detainer or notifying federal immigration authorities of an alien's release from custody except in very narrow circumstances.¹²⁹ Further, New York City enacts policies designed to actively court illegal immigrants. For instance, NYC “allows non-citizens to apply for cash assistance regardless of immigration status.”

<https://denver.legistar.com/LegislationDetail.aspx?ID=3128614&GUID=3A568876-8302-4856-AFA4-F505A637FFD9>.

¹²² *Id.*

¹²³ HB19-1124, Protect Colorado Residents from Federal Government Overreach, 2019 Regular Session (Mar. 28, 2019), available at <https://leg.colorado.gov/bills/hb19-1124>.

¹²⁴ *Id.*

¹²⁵ DJ Summers, *The Ongoing Cost of Denver Migrants*, COMMON SENSE INST. COLORADO (May 30, 2024), available at <https://www.commonsenseinstituteus.org/colorado/research/housing-and-our-community/the-ongoing-cost-of-denver-migrants>.

¹²⁶ See Adam Shaw, *Denver Mayor Says He's Prepared to Go to Jail Over Opposition to Trump Deportations of Illegal Immigrants*, FOX NEWS (Nov. 25, 2024, 12:46 PM), available at <https://www.foxnews.com/politics/denver-mayor-says-hes-prepared-go-jail-over-opposition-trump-deportations-illegal-immigrants>.

¹²⁷ Marc Sallinger, *Denver Mayor Mike Johnston Backtracks Comments About Sending Denver Police Officers to Block Trump Deportation Efforts*, 9NEWS (updated Nov. 22, 2024, 7:19 PM MST).

¹²⁸ *Id.*

¹²⁹ See Admin. Code of the City of New York §§ 9-131 (Dep't of Corr.); 14-154 (Police Dep't); 9-205 (Dep't of Prob.), available at <https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCAadmin/0-0-0-5445>.

vii. *Boston*

Boston is a sanctuary jurisdiction under the Boston Trust Act, which the Boston City Council recently voted unanimously to reaffirm.¹³⁰ The Boston Trust Act prevents local officials from detaining illegal aliens to comply with an ICE detainer request even if the illegal alien has a criminal history.¹³¹ It also prevents local officials from asking individuals about their immigration status—among other information, and prohibits local officials from “[r]esponding to a request from ICE-[Homeland Security Investigations (HSI)] for information about a specific person’s criminal history.”¹³² Further, Boston is also subject to Massachusetts’s judicial precedent finding ICE detainers an unlawful exercise of state power.¹³³

Mayor Michelle Wu “reiterated Boston’s status as a sanctuary city” shortly after the 2024 presidential election.¹³⁴ She also doubled-down on her vow to “not cooperate[] with” ICE’s efforts, which she claimed, “actually threaten the safety of everyone by causing widespread fear.”¹³⁵

c. The Trump Administration’s Response to Sanctuary Jurisdictions

The Trump Administration acted decisively to counter sanctuary jurisdictions’ obstruction of federal immigration law. The Trump Administration’s approach has been framed around a few key pillars: 1) rescinding the previous administration’s reckless immigration policies; 2) utilizing the court system to compel compliance by sanctuary jurisdictions; 3) working to safeguard taxpayer funds from flowing to irresponsible sanctuary jurisdictions and 4) empowering federal immigration enforcement agencies to execute their missions.

i. *Rescinding Dangerous Biden-Harris Policies*

On his first day in office, President Trump signed Executive Order 14159, “Protecting the American People Against Invasion,” which declared it U.S. policy to faithfully execute immigration laws against all inadmissible and removable aliens.¹³⁶ The same day, DHS rescinded the Biden-Harris Administration’s guidelines that prevented ICE and CBP enforcement actions in so-called “sensitive” areas, such as hospitals and community gathering places, which

¹³⁰ See Gayla Cawley, *Boston City Council reaffirms sanctuary status to ‘brace for impact’ of Trump mass deportation vow*, BOSTON HERALD (Dec. 5, 2024, 9:01 AM EST); and see also City of Boston Mun. Code, 11-1.9 Boston Trust Act (accessed Jan. 24, 2025), available at

https://codelibrary.amlegal.com/codes/boston/latest/boston_ma/0-0-0-7416#JD_11-1.9.

¹³¹ City of Boston Mun. Code, 11-1.9 Boston Trust Act (accessed Jan. 24, 2025), available at https://codelibrary.amlegal.com/codes/boston/latest/boston_ma/0-0-0-7416#JD_11-1.9.

¹³² *Id.*

¹³³ See *Lunn v. Commonwealth*, 78 N.E.3d 1143 (Mass. 2017).

¹³⁴ Walter Wuthmann, *Wu reasserts Boston’s sanctuary city status ahead of Trump’s second term*, WBUR (Nov. 18, 2024).

¹³⁵ Mary Saladna, *Boston Mayor Michelle Wu among several mayors called to testify in Capitol Hill hearing on sanctuary cities*, WCBV 5 ABC (updated Jan. 28, 2025, 5:47 AM EST).

¹³⁶ “Protecting the American People Against Invasion,” THE WHITE HOUSE (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>; see also Exec. Order 14159, *Protecting the American People Against Invasion*, 90 Fed. Reg. 8443 (Jan 20, 2025), available at <https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-02006.pdf>.

illegal aliens had long used to evade federal law enforcement.¹³⁷ DHS simultaneously ended the Biden-Harris Administration’s liberal use of humanitarian parole which enabled widespread abuse of the practice, returning the use of the practice to a case-by-case basis.¹³⁸

Furthermore, the Trump Administration has targeted those Biden-Harris policies which prevented proper interagency cooperation in the fight against illegal immigrant crime and child trafficking. This February, HHS issued guidance requiring comprehensive background checks, fingerprinting, and valid identification documents for all sponsors and adult household members before any alien minor can be released.¹³⁹ The Trump Administration has also restored ICE access to HHS databases containing information about unaccompanied alien children and their sponsors – access that was cut off during the Biden-Harris Administration.¹⁴⁰

ii. *Challenging Sanctuary Jurisdiction Leadership in Court*

Executive Order 14159 additionally directed DOJ and DHS to undertake any warranted legal action—criminal or civil—against jurisdictions interfering with federal immigration enforcement.¹⁴¹ Accordingly, in February, DOJ filed lawsuits against the State of Illinois and the City of Chicago, seeking to block policies of both jurisdictions which obstruct federal authorities from enforcing immigration law.¹⁴² The Administration did not stop there. DOJ subsequently expanded its legal actions to target sanctuary jurisdictions nationwide, filing lawsuits against Los Angeles, New York City, Denver, Rochester, and four New Jersey cities.¹⁴³

To expose sanctuary jurisdictions to the public, President Trump directed DHS to publish a comprehensive list of sanctuary jurisdictions and formally notify each that the administration deemed them noncompliant with federal immigration law, and subject to judicial action.¹⁴⁴ The pressure campaign against radical sanctuary jurisdictions has started to work. Thus far, at least

¹³⁷ “Statement from a DHS Spokesperson on Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole,” DEPT. OF HOMELAND SECURITY (Jan. 21, 2025), <https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse>.

¹³⁸ *Id.*

¹³⁹ “Field Guidance #26,” DEP’T OF HEALTH & HUMAN SERVS. OFF. OF REFUGEE RESETTLEMENT (Feb. 14, 2025), <https://acf.gov/sites/default/files/documents/orr/ORR-FG-26-Revised-Fingerprint-Requirements-for-Sponsors-and-HHM--02-14-2025-.pdf>.

¹⁴⁰ “Trump Administration Increases Vetting for Sponsors of Unaccompanied Minors,” FED’N FOR AM. IMMIGR. REFORM (Feb. 17, 2025), <https://www.fairus.org/news/executive/trump-administration-increases-vetting-sponsors-unaccompanied-minors>.

¹⁴¹ *Supra*, n.136 at Sec. 17.

¹⁴² Adam Edelman et al., “Trump administration sues Illinois and Chicago over immigration policies,” NBC NEWS (Feb. 6, 2025), <https://www.nbcnews.com/politics/immigration/trump-administration-sues-illinois-chicago-sanctuary-city-policies-rcna191079>.

¹⁴³ Rebecca Schneid, “Trump’s War On Sanctuary Cities Dealt Major Blow – But He Finds A New Battle,” TIME (Jul. 26, 2025), <https://time.com/7305683/trumps-battle-with-sanctuary-cities-dealt-major-blow-but-they-find-new-frontier/>.

¹⁴⁴ “DHS Exposes Sanctuary Jurisdictions Defying Federal Immigration Law,” DEPT OF HOMELAND SECURITY (May 29, 2025), <https://www.dhs.gov/news/2025/05/29/dhs-exposes-sanctuary-jurisdictions-defying-federal-immigration-law>.

two jurisdictions—the State of Nevada and Louisville, Kentucky—have agreed to comply with federal law and abandon destructive sanctuary policies.¹⁴⁵

iii. *Working to Safeguard Federal Taxpayer Funds*

President Trump has consistently sought to safeguard taxpayer resources from exploitation by sanctuary jurisdictions. Executive Order 14159, issued by President Trump on January 20, 2026, directed the Attorney General and Secretary of Homeland Security to “evaluate and undertake any lawful actions to ensure that so-called ‘sanctuary’ jurisdictions, which seek to interfere with the lawful exercise of Federal law enforcement operations, do not receive access to Federal funds.”¹⁴⁶ Executive Order 14287 directed the Attorney General to “publish a list of States and local jurisdictions that obstruct the enforcement of Federal immigration laws (sanctuary jurisdictions)” and further directed all executive department and agency heads to “identify appropriate Federal funds to sanctuary jurisdictions, including grants and contracts, for suspension or termination, as appropriate.”¹⁴⁷ President Trump recently reiterated his administration’s commitment to safeguard taxpayer funds from flowing into lawless jurisdictions, indicating that the federal government would stop making payments to sanctuary jurisdictions in February, 2026.¹⁴⁸

Meanwhile, numerous actions across Federal departments and agencies have sought to ensure that taxpayer funds are safeguarded from flowing to illegal aliens and supporting sanctuary jurisdictions that provide federal funds to illegal aliens, including, for example, actions to safeguard funds administered by the U.S. Department of Housing and Urban Development,¹⁴⁹ the U.S. Department of Health and Human Services, and the U.S. Department of Education.¹⁵⁰ Unsurprisingly, numerous sanctuary jurisdictions have filed lawsuits to challenge these efforts by the Trump administration as they continue to flaunt the law and protect illegal aliens.¹⁵¹

¹⁴⁵ Liam Hibbert, “Trump administration takes Nevada off sanctuary state list,” THE CENTER SQUARE (Sept. 29, 2025), https://www.thecentersquare.com/nevada/article_08a650dd-7ae5-4d43-89f9-09e11f33428e.html (describing Nevada’s compliance with federal immigration law); “Louisville Revises Sanctuary Policies: Early Indicator or Growing Trend,” FED’N FOR AMERICAN IMMIGR. REFORM (July 25, 2025), <https://www.fairus.org/blog/2025/07/25/louisville-revises-sanctuary-policies-early-indicator-growing-trend> (describing Louisville’s compliance with federal immigration law).

¹⁴⁶ *Supra*, n.136 at Sec. 17.

¹⁴⁷ Exec. Order 14287, *Protecting American Communities from Criminal Aliens*, 90 Fed. Reg. 18761, (Apr. 28, 2025), available at <https://www.govinfo.gov/content/pkg/FR-2025-05-02/pdf/2025-07789.pdf>; see also U.S. Dep’t of Justice, Office of Public Affairs, *Justice Department Publishes List of Sanctuary Jurisdictions*, (Aug. 5, 2025), available at <https://www.justice.gov/opa/pr/justice-department-publishes-list-sanctuary-jurisdictions>.

¹⁴⁸ *US to cut funding to states over ‘sanctuary cities,’ Trump says*, REUTERS (Jan 14, 2026), available at <https://www.reuters.com/world/us/trump-says-federal-payments-sanctuary-cities-end-february-1-2026-01-14/>.

¹⁴⁹ Memorandum of Understanding Between United States Department of Homeland Security and United States Department of Housing and Urban Development (Mar. 24, 2025), available at <https://www.hud.gov/sites/dfiles/PA/documents/DHS-HUD-MOU-032425.pdf>.

¹⁵⁰ See e.g. U.S. Department of Health and Human Services, *Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) Interpretation of “Federal Public Benefit”*, 90 Fed. Reg. 31232 (July 14, 2025), available at <https://www.govinfo.gov/content/pkg/FR-2025-07-14/pdf/2025-13118.pdf> & *Clarification of Federal Public Benefits Under the Personal Responsibility and Work Opportunity Reconciliation Act*, 90 Fed. Reg. 30896 (July 11, 2025), available at <https://www.govinfo.gov/content/pkg/FR-2025-07-11/pdf/2025-12925.pdf>.

¹⁵¹ See *City of San Francisco, et. al. v. Trump, et al*, 25-cv-1350-WHO, Order Granting Preliminary Injunction (Apr. 24, 2025) & Order Granting Second Motion for Preliminary Injunction and Ruling on Propriety of HUD Continuum of Care and Formula Grant Conditions (Aug. 22, 2025) (enjoining enforcement of funding deprivations pursuant to

Continued litigation over these matters only reiterates the need for Congress to act with the power of the purse to ensure federal funds do not flow to sanctuary jurisdictions.

iv. Empowering DHS and ICE to Execute their Mission

In addition to tearing down the impediments to immigration enforcement posed by Biden-Harris-era policies and sanctuary jurisdiction resistance, the Trump Administration and the Republican Congress have empowered federal immigration enforcement like never before. Fulfilling President Trump’s core campaign promises, the One Big Beautiful Bill, signed into law on July 4, 2025, provided for a historic increase for immigration enforcement funding. A staggering \$29.9 billion has been approved to enhance ICE operations, which includes funds to hire 10,000 new officers;¹⁵² \$45 billion is dedicated to dramatically expanding alien detention capacity;¹⁵³ and \$51.6 billion will go toward construction of a border wall, checkpoints, and other border infrastructure.¹⁵⁴

The provisions of the One Big Beautiful Bill have enabled the Administration to fulfill its mandate to secure the southern border and start reversing the foreign invasion of the homeland that the Biden-Harris Administration, left-wing sanctuary jurisdictions, and others have encouraged. The Trump Administration has achieved record deportation numbers—with over 2,000,000 removed or self-deported as of September 23, 2025.¹⁵⁵ This historic success was achieved while dropping illegal crossing from Mexico to their lowest annual level since 1970.¹⁵⁶

Exec. Order 14159); *New York et. al. v. Dep’t of Justice et. al.*, 1:25-cv-00345 (MSM) Memorandum and Order (Sept. 10, 2025) (enjoining enforcement of PRWORA notices).

¹⁵² “What’s in the Big Beautiful Bill? Immigration and Border Security Unpacked,” AMERICAN IMMIGR. COUNCIL (July 14, 2025), <https://www.americanimmigrationcouncil.org/fact-sheet/big-beautiful-bill-immigration-border-security/>.

¹⁵³ *Id.*

¹⁵⁴ *Id.*

¹⁵⁵ “New Milestone: Over 2 Million Illegal Aliens Out of the United States in Less Than 250 Days,” DEPT. OF HOMELAND SECURITY (Sept. 23, 2025), <https://www.dhs.gov/news/2025/09/23/new-milestone-over-2-million-illegal-aliens-out-united-states-less-250-days>.

¹⁵⁶ Camillo Montoya-Galvez, “Illegal crossings along U.S.-Mexico border plummet to lowest annual level since 1970,” CBS NEWS (Oct. 7, 2025), <https://www.cbsnews.com/news/illegal-crossings-immigration-us-mexico-southern-border-lowest-level-1970-trump-dhs/>.

CONCLUSION

The evidence demonstrates that sanctuary jurisdictions represent a clear and present danger to American communities. State and local officials are actively undermining federal immigration enforcement, even when it is aimed at making their own communities safer. The human and financial costs of this obstruction have reached crisis levels, demanding sustained action from policymakers.

Despite President Trump's success in securing the border and enforcing the law, Democrat-run sanctuary cities and states continue to use all available means at their disposal to protect illegal alien criminals. Their policies have created environments where crime and chaos thrive, vulnerable children disappear into exploitation, and American taxpayers bear unsustainable financial burdens while receiving diminished public safety in return.

To the extent that state and local laws preclude cooperation with federal immigration enforcement, those laws must change. When Illinois Governor JB Pritzker vows to "stand in the way" of certain Trump Administration removal policies, when Minnesota Governor Walz compares ICE agents to the Nazi secret police, and when mayors pledge to obstruct federal law enforcement, they reveal their true priorities: protecting illegal alien criminals over their own constituents.

RECOMMENDATIONS

1. **Criminal Prosecutions.** Federal law already provides criminal penalties for harboring illegal aliens and obstruction of justice. The Department of Justice should evaluate whether sanctuary jurisdiction policies and the officials who implement them cross the line and violate these federal criminal statutes.
2. **Reforms for Unaccompanied Children.** Comprehensive reforms to how UACs are processed for removal are needed to ensure that vulnerable minors are swiftly and safely repatriated to their home countries and are not lost to trafficking or exploitation facilitated by the federal bureaucracy.
3. **Immediate Federal Funding Review and Recission.** Congress should defund to the maximum extent possible cities and states that prioritize criminal aliens over the American people. Federal funds should not subsidize policies that undermine federal law enforcement and endanger American communities.
4. **Enhanced Information Sharing Requirements.** Legislation should ensure that state and local jurisdictions receiving federal funds will provide ICE with access to driver's license databases, criminal justice information systems, and other records necessary for immigration enforcement, criminal investigations, and public safety operations.
5. **Continued Oversight.** Congressional Committees must continue to conduct oversight to ensure that federal immigration law is faithfully executed and American communities are protected without obstruction from state and local officials who side with illegal alien criminals.