

# **NYC** Mayor's Office of Immigrant Affairs

## **Legislative Hearing – Committee on Immigration**

**December 8, 2025**

Recent changes in federal policy have created fear and anxiety amongst immigrant communities like we have not seen in modern history. The escalation of arrests at ICE check-ins and courthouses, most notably at 26 Federal Plaza, and the pressure of increased ICE raids are taking a tremendous toll. These actions sow distrust in government and create a chilling effect on the use of critical city services amongst immigrant New Yorkers. This is an important moment for local government to step up and reinforce policies and laws that protect immigrant New Yorkers. All New Yorkers should feel safe sending their children to school, seeking health care at public hospitals, and filing police reports if they have been victims or witnesses of a crime, without fear of deportation. Below, the Mayor's Office of Immigrant Affairs (MOIA) comments on Intro 1268.

MOIA's role in city government is to ensure immigrant New Yorkers understand their rights and have equal access to benefits and services citywide. **Int. 1268** aligns with our commitment to create plain-language resources that clearly and explicitly outline local laws that are of particular interest to our immigrant communities as well as the rights individuals may assert under the Fourth Amendment. MOIA is in full support of legislation that expands the reach of linguistically accessible information that is important to immigrant New Yorkers.

MOIA is committed to ensuring that immigrant New Yorkers have clear information about their legal and constitutional rights. In 2025, our Outreach team made more than 35,000 direct touchpoints through resource fairs, Know Your Rights presentations, canvassing, and our AskMOIA email and hotline. Over the past four years, resources on MOIA's website were downloaded over 142,000 times by nearly 79,000 users. These materials, such as our Know Your Rights with ICE, information on language access rights, and our City services roadmap, help immigrants understand their legal protections and navigate City services. We are also launching a communications campaign to further promote our Immigration Legal Support Hotline.

With support from the City Council, we will keep expanding access to essential information for all immigrant communities.

**Testimony of Deputy Commissioner Carlos A. Ortiz  
New York City Department of Consumer and Worker Protection**

**Before the Committee on Immigration  
Hearing on Introductions 214, 1268, 1272, 1412**

**December 8, 2025**

***Introduction***

Good morning, Chair Avilés, and members of the Committee. My name is Carlos Ortiz, I am the Deputy Commissioner for External Affairs at the Department of Consumer and Worker Protection (DCWP). Thank you for the opportunity to testify on Introduction 1272.

***Protecting New York's Workers***

DCWP enforces key worker and consumer protections and offers financial empowerment resources that improve critical aspects of New Yorkers' daily economic lives. We ensure that consumers who have been deceived or exploited have recourse, that workers have a passionate defender of their rights, and that all New Yorkers have the support they need to improve their financial health. Under Commissioner Vilda Vera Mayuga's tenure, we have delivered almost \$2 billion back to New Yorkers.

DCWP serves as the City's central resource for workers in New York City. The laws that we enforce protect and promote labor standards and policies that create fair workplaces to ensure all workers can realize their rights, regardless of immigration status. We strive to ensure compliance with our essential workplace laws and secure restitution for workers who have faced violations in the workplace. Under Commissioner Mayuga's tenure, DCWP has delivered close to \$90 million in restitution for more than 50,000 workers. We are very proud of the success we have had in strengthening these protections and will continue to ensure that working families and individuals have these crucial workplace rights, regardless of immigration status.

***Introduction 1272***

DCWP supports the intent of Introduction 1272, which intends to restrict employers from using E-Verify or any other employment eligibility verification system to check the employment authorization status of an employee or an applicant who has not been offered employment, except when federally required. Our understanding is that there are serious problems with the E-Verify system. However, we have concerns that this legislation may be duplicative of existing requirements.

According to the U.S. Citizenship and Immigration Services (USCIS) E-Verify reference guide, employers are already required to display E-Verify participation posters in English and Spanish and provide each employee with notice of and the opportunity to take action on a Tentative Nonconfirmation (mismatch). Additionally, employers are already prohibited from using E-

Verify to pre-screen job applicants for employment. As a result, it may not create meaningful new protections to write these requirements into city law.

There is also existing law that prohibits discrimination on the basis of actual or perceived “immigration and citizenship status” and “national origin,” among other categories, by employers in New York City. In January of 2025, CCHR issued updated guidance on national origin discrimination, which discusses document abuse and instances in which reverification of employment could be unlawful under the NYC Human Rights Law.

### ***Conclusion***

Thank you again for the opportunity to testify before the committee on these issues and today’s bill. DCWP welcomes continued collaboration and partnership with all stakeholders, workers’ advocates, and the Council to ensure that workplace protections and resources are available to all New Yorkers, regardless of immigration status.

**Testimony before the  
New York City Council  
Committee on Immigration  
Chair Alexa Avilés**

**Submitted By  
NYC Department of Correction**

**December 8, 2025**

The New York City Department of Correction (“DOC” or “the Department”) thanks the Committee on Immigration for the opportunity to submit testimony related to the Department’s practices with respect to the City’s detainer laws and to comment on the bills being considered at the hearing.

**Departmental Policies**

The Department recognizes the City’s efforts to promote policies that support immigrant communities while simultaneously maintaining public safety and confidence in our jails and local government. In accordance with New York City’s laws, the Department does not subject its officers or employees to the direction of federal immigration enforcement authorities. The Department’s policies make clear that DOC’s role is not to conduct immigration enforcement. This helps give all New Yorkers, irrespective of immigration status, assurance in their local government’s integrity. As a matter of policy, the Department does not comply with Immigration and Customs Enforcement (“ICE”) detainers absent a judicial warrant. In accordance with local law, if the Department receives a detainer from ICE, ICE will be notified of an individual’s release

only if the individual is in custody on Rikers Island and (i) has a qualifying conviction, meaning a conviction for a violent or otherwise serious crime, within the past five years; or (ii) is identified to the agency as a possible match in the terrorist screening database, and if the request is supported by a document showing probable cause. This notification is made when the discharge process begins. Importantly, the Department will not detain an individual beyond the time that the individual is authorized to be released from custody under local or state law. If ICE does not arrive to take custody of the individual prior to discharge, then the transfer will not occur. Perhaps most significantly, if these criteria are not met – no qualifying conviction and no terrorist screening database match – DOC will not communicate further with ICE about the individual in question and will not facilitate a transfer to ICE custody.

Cooperation happens very infrequently, and the Department's public reporting reflects this. Between July 2024 and June 2025, federal immigration authorities lodged 595 detainers and only 19 individuals were transferred to federal authorities.

### **Proposed Legislation**

With regard to Intro 214, which would create a private right of action related to alleged violations of the City's detainer laws as well as several other local laws, the Department has concerns regarding the broad circumstances that may give rise to a claim, as it will be difficult for the Department to differentiate cases in which an individual is held for an extended period due to an immigration detainer versus when an individual is held for an extended period due to other factors. Other requirements outlined in the bill related to notifications and communications would create immense operational and administrative burdens for the agency and may require information that the Department does not normally maintain. Importantly, as currently drafted,

it would allow for claims even when violation is inadvertent or unknowing. The City looks forward to continuing discussions with Council.

New York City is committed to protecting the rights of undocumented individuals and has worked to narrow the circumstances under which the Department cooperates with ICE. The Department is concerned that Intro 1412 is overly broad and would remove the City's ability to coordinate with federal agencies, including the Department of Homeland Security, on planning, strategizing, and enforcement of issues related to public safety, such as coordinated criminal activity. The bill will also curtail the Department's ability to coordinate with law enforcement from other state and local jurisdictions around the country. We are continuing to review the legislation and look forward to further discussions with the Council.

## **Conclusion**

The Department of Correction is committed to the goals of upholding public safety and protecting the safety and security of all the individuals that live and working within the City's jails. Those goals do not include enforcement of immigration laws, and we appreciate the Council's interest in protecting immigrant communities.



## OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

**ANTONIO REYNOSO**

Brooklyn Borough President

Good morning, Chair Avilés, and thank you for holding this important hearing today. I am here representing Brooklyn Borough President Antonio Reynoso.

President Trump's attacks on immigrant communities present an ongoing threat to so many across our city. In a time where masked ICE agents are snatching and separating children away from their parents and arresting law-abiding immigrants at mandated court appearances, it is more important than ever to protect the most vulnerable members of our communities. As ICE agents feel emboldened to terrorize immigrants with impunity, this city has a responsibility ensure that New York remains a sanctuary for all who call it home, regardless of immigration status. Borough President Reynoso has made it clear that ICE is not welcome in Brooklyn. That is why he supports all the bills being heard on today's agenda:

**Intro 214 (NYC Trust Act):** We refer to NYC as a sanctuary city based not on some abstract concept, but on the law. NYC law limits DOC and NYPD from honoring detainer requests from ICE outside of very specific situations, limits ICE's access to City property, prohibits use of City time for immigration enforcement, and limits information that City employees can share with ICE. Yet, collusion between ICE and the NYPD and DOC persists, with everyone from NYPD top brass to Mayor Adams having called for an end to our sanctuary policies. As ICE raids become more frequent, those of us who believe in protecting our neighbors are called upon to defend and strengthen our sanctuary laws. The Council can do this by passing Intro 214, which will create a private right of action so that those impacted by illegal collusion between officers and ICE can seek redress in court.

**Intro 1412:** Another way we can prevent collusion between officers and ICE is to ensure that ICE is never allowed to establish an office on any DOC property, including and especially the Rikers Island jail. Borough President Reynoso commends the Council for challenging Mayor Adams' recent attempt to return ICE to Rikers more than a decade after they vacated their office there, and for introducing this important legislation to clarify that they cannot and will not be allowed to come back.

**Intro 1272:** This bill will prevent NYC employers from using the federal E-Verify system to verify employment eligibility. President Trump wants to make this system mandatory. Not only would that give the federal government a concerning amount of power over workers, evidence shows that the system just doesn't work, wrongly shutting out thousands of eligible workers every year. This proactive bill will help ensure that New Yorkers' personal information is protected and they are not put at risk of having their livelihoods impacted by a faulty system.

**Intro 1268:** Informing New Yorkers of their legal protections in public and private areas will empower them to invoke their legal rights without fear of overreach by federal authorities. Too often those who are unaware of their individual rights fall victim to intimidation tactics and unlawful detention. This bill would close this gap by mandating widespread public notices of legal protections and therefore ensuring that every New Yorker is aware of their rights when confronted by federal immigration enforcement.

Thank you again for holding this important hearing. We must ensure that as President Trump ramps up his anti-immigration agenda, our city remains as the cornerstone of hope and safety for vulnerable communities under attack. This requires action at all levels – from folks on the ground who have put themselves on the line to stop raids, to local, state, and federal governments. Borough President Reynoso urges the Council to move quickly to pass these bills before the end of the term. Let's continue to work together to protect our immigrant neighbors. Thank you.



**The New York City Council Committee on Immigration**

**Honorable Alexa Avilés, Chair**

Oversight - Immigration Legal Services

**Oral Testimony of the New York Immigration Coalition**

**December 8th, 2025**

Good morning Chair Avilés, and members of the Committee. Thank you for the opportunity to testify today on the key legislation on today's agenda, and the critical steps that this body must take to strengthen our city's existing sanctuary laws and ensure that New York City is protected from ongoing federal overreach. My name is Devashish "Dave" Basnet, and I am the Senior Immigration Rights Policy Manager at the New York Immigration Coalition (NYIC). The NYIC is a statewide network of more than 200 organizations that support immigrants and refugees across New York State.

New York City has reliably been a national leader in upholding our municipal protections for immigrant communities through our longstanding sanctuary laws. For decades, the laws have sought to protect our city's local resources and ensure they are not wasted on collusion with federal immigration enforcement. In order to respond to the Trump administration and its cruel agenda of indiscriminate deportation and detention, our sanctuary laws need to be updated, and strengthened so that they can be responsive to the moment our city and our country is confronting: a moment where federal agents act with impunity, where rule of law and constitutional protections are regularly undermined, and where immigrant families are being torn apart as a daily occurrence.

On behalf of the NYIC, I would like to thank Chair Avilés and the Committee for their leadership in fighting to make sure immigrant New Yorkers are at the center of the city's core priorities as federal attacks escalate across the five boroughs. Today, the NYIC, alongside the ICE Out NYC Coalition is calling on the Council to continue to champion the rights of all New Yorkers and to swiftly pass [Intro 214](#), the NYC Trust Act, and [Intro. 1412](#), the Safer Sanctuary Act.

The tactics and strategies of federal immigration enforcement are changing, and more federal resources are being diverted to aid the Trump Administration's mass deportation and



detention plan. The Trump Administration has also [diverted critical resources](#) typically used for national security and emergency and disaster response to [facilitate the hiring, recruitment, and expansion](#) of deportation agents. To ensure that our sanctuary laws are evolving at the pace that the Trump administration's tactics are, our city and our communities urgently need the NYC Trust Act and the we need the Safer Sanctuary Act.

Our city can no longer wait for its leaders to take action. We know that there is a need for accountability because of our expanding list of examples of agencies that have violated our sanctuary laws. The [December 2025 DOI report](#) found that the NYPD violated our city's sanctuary laws in at least one instance is indicative of the necessity for tangible accountability and justice for New Yorkers. This makes clear that our laws need a mechanism for enforcement and accountability. In the face of thousands of new immigration agents, billions of dollars in federal funding for a supercharged deportation and detention campaign, we need to pass laws that strengthen existing protections, and create accountability for our city's sanctuary laws so that we protect our immigrant communities from the federal government's overreach and ensure the safety and well-being of every New Yorker. We call on the Council to pass the NYC Trust Act to ensure compliance with our city's sanctuary laws and allow for accountability when our laws are broken.

The Safer Sanctuary Act comes at a time when the [New York State Supreme Court upheld](#) what was accomplished by advocates and the Council more than a decade ago: unequivocally rejecting ICE presence at Rikers Island. Mayor Eric Adams' attempt at restoring ICE presence at Rikers Island with [Executive Order 50](#) stood in complete violation of our city's sanctuary protections, and ultimately, the action was invalidated by our courts and New Yorkers were once again protected from the federal government's overreach in our city, even if city officials tried circumvent our city laws by opening a back door to collusion. The Safer Sanctuary Act would remove the ambiguity that allowed Mayor Adams to act with impunity in the first place and would also revise how immigration authorities are defined to reflect the broad ways in which federal entities are being weaponized to enforce immigration law. Drawing on the previous [large-scale immigration raid](#) and [attempted raid at Canal St](#) in Downtown Manhattan as an example, the federal agents present to conduct immigration enforcement included agents from ICE, HSI, FBI, ATS, CBP, IRS, and DEA, and more.



We call on the Council to pass the Safer Sanctuary Act to permanently prevent ICE from maintaining any quarters on the Department of Correction's property and to expand the definitions that are currently written into our city's laws to ensure that we are fully protecting New Yorkers from collusion with all types of federal immigration enforcement, as our laws have always intended.

The Council must urgently act and pass the NYC Trust Act and the Safer Sanctuary Act, to create a private right of action for New Yorkers that are harmed by collusion and close the loopholes for collusion by strengthening our existing sanctuary laws.

Respectfully submitted,

Devashish "Dave" Basnet

The New York Immigration Coalition



**Asian American Federation**

**Testimony to the New York City Council  
Committee on Immigration**

*December 8, 2025*

**Introduction**

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration for holding this hearing and for providing us with the opportunity to testify. My name is Nat Moghe, Advocacy Coordinator at the Asian American Federation (AAF), where we proudly represent the collective voice of more than 70 member organizations serving 1.5 million Asian New Yorkers. I'm honored to testify alongside our partners of the Rapid Immigration Support and Empowerment (RISE) Network – a network of nearly 20 Asian-led and Asian-serving organizations providing immigration case management and legal services support to New Yorkers.

**Current Immigration Legal Landscape for Asian New Yorkers**

The current presidential administration has brought drastic policy changes at the federal, state, and local levels. Policy changes impacting our Asian communities in New York City include H.R. 1. This piece of legislation delivers tax cuts to the wealthiest Americans while boosting the detention budget of Immigration and Customs Enforcement (ICE) by 308%, raising the risk of sudden arrests, workplace raids, and family separations – even for long-time residents. Over \$75 billion will be allocated to ICE through 2029, which will have severe consequences for Asian American New Yorkers' safety, stability, and dignity.

In New York State, 24% of unauthorized immigrants are from Asia, and one in seven undocumented immigrants nationwide is Asian. Arrests of immigrants from Asian countries, including China, Bangladesh, Nepal, and India, have increased significantly compared to last year. According to a new analysis by THE CITY, which examined federal records from the Deportation Data Project, there has been a 1,044% rise in arrests of Chinese immigrants and a 1,000% increase in arrests of Bangladeshi immigrants from 2024 to 2025.<sup>1</sup> ICE's brute and indiscriminate tactics have shattered families, instilled fear, and prevented New Yorkers from accessing essential services, such as law enforcement, public benefits, healthcare, and education. From long-term residents who have not adjusted their status, refugees, asylum seekers, individuals with Temporary Protected Status (TPS), special visas, and immigrant families, regardless of when they arrived in the U.S., our communities are on high alert.

New York City's sanctuary laws specifically prohibit cooperation on civil immigration enforcement, except for limited exceptions. However, in our current political climate, where the lines of enforcement are blurred, we've seen instances where those protections are completely ignored. For instance, in September of this year, a NYC corrections officer shared real-time information with federal immigration officers about the release of a man detained at Rikers Island in violation of New York City's sanctuary law, leading to the person's arrest by ICE officers.<sup>2</sup> The Department of Investigation found that jail employees received no training on the

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<sup>1</sup> Chu, H., & Hogan, G. (2025, July 14). NYC Immigration Arrests Just Shot Through the Roof, New Data Shows. THE CITY - NYC News. <https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/>

<sup>2</sup> Hogan, G. (2025, September 25). Rikers Officer Shared Info With ICE in Sanctuary Violation, Probe Finds. THE CITY - NYC News. <https://www.thecity.nyc/2025/09/25/correction-investigation-sanctuary-city-violation/>



## **Asian American Federation**

rules against prohibiting them from providing federal authorities with information about immigrants. While New York City law prohibits local government cooperation with immigration enforcement, federal agents have broad authority to make arrests, and local officials are struggling to determine how to stop them. In late October of this year, ICE conducted a militarized raid on Canal Street in Chinatown, arresting nine immigrant vendors and five protestors. The NYPD was made aware of the raid in advance, despite being directed to not engage or assist with ICE enforcement. On November 29th, the NYPD helped ICE agents push citizens out of the way while arresting more than a dozen protestors.<sup>3</sup> Raids are expected to escalate throughout December, creating fear within our communities and the city. With the threat of militarized violence in our city and the lack of protection and training from NYPD officers, immigrant New Yorkers' rights continue to be violated and individuals with lawful immigration status continue to be detained without due process. In August of 2025, the Congressional Asian Pacific American Caucus wrote a letter describing multiple reports of AAPI lawful permanent residents being detained without access to due process.<sup>4</sup> As immigrant New Yorkers face heightened threats, we must prevent local and state law enforcement and agencies from diverting resources to the federal deportation agenda and sharing sensitive information with federal immigration authorities. Alongside this, our city must invest in our community-based organizations (CBOs) that are on the ground protecting and providing services to those who are targeted and wrongfully detained.

### **The RISE Network's Immigration Services and Advocacy**

This year, AAF advocated for resources to equip our RISE Network to respond quickly and effectively to the immigration challenges facing vulnerable Asian New Yorkers. Doing the on-the-ground work takes an enormous amount of effort from our CBOs who are immensely trusted within our communities. Our CBOs are especially vital during these unprecedented times as successful immigration services require deep community involvement and linguistic competency. However, these CBOs are often not integrated into mainstream systems and processes, leaving Asian American communities isolated from the information and services they need to navigate the impact of policy changes.

Earlier this year, AAF surveyed our member organizations to see which immigrant communities they serve, what gaps exist, and what their needs are in terms of providing immigration-related services. Only 5.6% of our member organizations said they had capacity to take on additional immigration related cases, while the majority reported being under-resourced to meet the growing demand. Support from external immigration services was also bleak as our CBOs reported that the mainstream organizations they would normally refer clients to were stretched thin and either had long wait lists or were not accepting clients due to strained capacity.

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<sup>3</sup> Hogan, G., Kroles, A., & Honan, K. (2025, November 29). NYPD Arrest More Than a Dozen Protesting Homeland Security Agents in Tense Confrontation. THE CITY - NYC News. <https://www.thecity.nyc/2025/11/29/nypd-ice-homeland-security-canal/>

<sup>4</sup> Chair Grace Meng, Rep. Dave Min, and CAPAC Members Demand Answers into ICE's Treatment of Asian Immigrants. (2025, August 9). Congressional Asian Pacific American Caucus (CAPAC). <https://capac.house.gov/press-release/chair-grace-meng-rep-dave-min-and-capac-members-demand-answers-ices-treatment-asian>



## Asian American Federation

Funding Asian leading and serving CBOs directly is an effective way to provide immediate immigration support to the Asian community. Past funding for AAF's rapid response program in 2016-2020 allowed AAF and our network to serve 8,090 Asian New Yorkers with services ranging from intakes to consultations; representation on various cases; assistance with citizenship, green card, DACA, family petition, and U/T visa applications; case management to access immigration legal services; and Know Your Rights trainings. AAF's network of CBOs provided this wide range of services throughout New York City to the Arab, Cambodian, Chinese, Bangladeshi, Filipino, Indian, Indo-Caribbean, Japanese, Korean, Nepali, Pakistani, and Vietnamese communities in over 12 languages.

Asian CBOs facing funding cuts and political threats are already spread thin, doing our best with limited resources to share information, calm anxieties, and provide help in multiple languages. We are incredibly grateful for the FY 26 City Council funding provided to AAF and our RISE Network partners to support in-language, culturally competent immigration legal services and case management. However, while Asian non-citizens make up nearly 30% of New York City's non-citizen population,<sup>5</sup> our network of Asian CBOs only received 3.9% of the additional \$50 million City Council invested in immigration legal services funding this year. We applaud the record-breaking investment in legal services funding and urge the City Council to increase its investment in Asian CBOs in FY 27 to address these gaps and meet the needs of immigrants who are under threat.

### **Recommendations**

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. We make the following recommendations to the City Council:

- **Support the following to prioritize constitutional and legal protections for immigrants:**
  - ***Int 0214-2024 - Shahana K. Hanif*** - We support Int 0214-2024, which aims to establish a private right of action concerning civil immigration detainers and collaboration with federal immigration agencies. This will help ensure rights are protected and that they have a voice in safeguarding their dignity and well-being.
  - ***Int 1268-2025 - Alexa Avilés*** - We support the creation of signage describing certain constitutional and legal protections. A clear understanding of these rights empowers individuals and fosters community awareness.
  - ***Int 1272-2025 - Shahana K. Hanif*** - Restricting employers from using E-Verify or any other employment eligibility verification system to check the employment authorization status of an employee or an applicant who has not been offered employment. This ensures that candidates are evaluated based on their qualifications and skills rather than their immigration status, which could lead to discrimination.
  - ***Int 1412-2025 - Tiffany L. Cabán*** - We support redefining terms concerning immigration enforcement to account for current enforcement practices, prohibiting the maintenance of an office or quarters on property under the jurisdiction of the DOC by federal immigration authorities, and expanding

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<sup>5</sup> AAF's internal analysis of 2023 ACS PUMS data.



## **Asian American Federation**

funding for CBOs that provide immigration legal services and case management for AAPI communities.

- **Protect and expand funding for the following initiative:** Legal Services for AAPI Communities; Legal Services for Day Laborers & Domestic Workers; and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
- **Expand investment in language-accessible legal services** to include and prioritize case management as our CBOs act as a critical bridge, providing wrap-around case management when making referrals to legal services.
- **Continue supporting AAF's coordination of an immigration rapid response network** to connect immigrants and their families with critical legal services, case management, community education, and accurate resources to address a rise in misinformation, isolation, and fear.
  - Work with the RISE Network – made up of nearly 20 Asian-led and -serving organizations providing immigration case management and legal services – to establish clear lines of communication so our CBOs have an established, regular opportunity to share how immigration enforcement is impacting the AAPI community.
- **Prioritize supporting small- and mid-sized CBOs serving emerging immigrant communities.**
  - Our CBOs are trusted partners with deep relationships with vulnerable community members who are less likely to interact with mainstream organizations and government systems in this current environment. Under current structures, these CBOs are not integrated into the planning process, leaving Asian American communities isolated from the information and services they need to navigate the impact of policy changes.
- **Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.**
  - We applaud City Council Speaker Adams' efforts to improve contracting processes for our CBOs and we ask that City Council continue holding the Mayoral administration accountable for streamlining the contracting and procurement process of culturally-competent safety net programs to ensure CBOs receive funding promptly to deliver crucial services.

### **Conclusion**

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. Thank you for allowing us to testify and we look forward to working with you to make sure our immigrant communities get the support they deserve. If you have any questions, I can be contacted at [nat.moghe@aafederation.org](mailto:nat.moghe@aafederation.org).



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**Adhikaar for Human Rights and Social Justice  
Testimony to the New York City Council  
Committee on Immigration  
December 8, 2025**

To:  
Councilmember Alexa Aviles, Chair  
Committee on Immigration Members

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration, for holding this hearing and for providing us the opportunity to testify. My name is Tsering Lama, and I am a senior manager of Organizing and Policy at Adhikaar. Adhikaar, meaning “rights” in Nepali, is the only women-led worker and community center serving and organizing the Nepali-speaking community on workers’ rights, immigrants’ rights, youth empowerment, access to healthcare, and language justice. Most of our members are women and work in the informal sector as nail salon workers, domestic workers, taxi drivers, and restaurant workers. A majority of our members live in Jackson Heights, Woodside, East Elmhurst, Elmhurst, Corona, Maspeth, Sunnyside, Ridgewood, Jamaica and Flatbush.

We are here today testifying alongside our partners from the Rapid Immigration Support and Empowerment (RISE) Network— a network of nearly 20 Asian-led and Asian-serving organizations providing immigration case management and legal services support to New Yorkers.

**Current Immigration Legal Landscape for Asian New Yorkers**

As new immigrants, many of our members are Temporary Protected Status (TPS) holders, of mixed family status, or undocumented individuals who are forced to navigate a terrorizing, opaque immigration system that puts them at risk for deportation and detention. Our work in advancing immigration justice responds directly to these challenges. A central facet of this work involves the provision of culturally competent case support to our at-risk members, particularly at the intersection of immigration and workers rights. Many of our members depended on TPS for their work authorizations, their health insurance, business licenses, travel documents, etc. TPS for Nepali Nationals was terminated this year on Aug 5 by the Trump administration leaving thousands of lives in a precarious situation. Our work in advancing immigration justice responds directly to these types of challenges by providing culturally competent case support to our at-risk members, particularly at the intersection of immigration and workers rights.

The current presidential administration has brought drastic policy changes at the federal, state, and local levels. New York City's sanctuary laws restrict cooperation with civil immigration enforcement, yet recent events indicate these protections are often overlooked. In September, a NYC corrections officer provided federal immigration officers with real-time information about the release of a man from Rikers Island, violating the city's sanctuary law, which resulted in his arrest by ICE. In late October of this year, ICE conducted a militarized raid on Canal Street in Chinatown, arresting nine immigrant vendors and five protestors. Similarly, on November 29th, the NYPD helped ICE agents push citizens out of the way while arresting more than a dozen protestors. In August 2025, the Congressional Asian Pacific American Caucus highlighted cases of AAPI lawful permanent residents being detained without due process, raising



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concerns about violations of constitutional rights and sanctuary laws. With the threat of militarized violence in our city and the lack of protection and training from NYPD officers, immigrant New Yorkers' rights continue to be violated, and individuals with lawful immigration status continue to be detained without due process. We must prevent local and state law enforcement and agencies from diverting resources to the federal deportation agenda and sharing sensitive information with federal immigration authorities. Alongside this, our city must invest in our community-based organizations (CBOs) that are on the ground protecting and providing services to those who are targeted and wrongfully detained.

### **The RISE Network's Immigration Services and Advocacy**

For Adhikaar, in FY25 we accompanied 200+ new cases related to labor trafficking, immigration bonds, ICE case support, general immigration, fraud, and wage; a process that involves one-on-one case management, interpretation, and community support. We work alongside various legal service providers like Asian American Legal Defense and Education Fund (AALDEF), TakeRoots Justice, Legal Aid Society, and City Bar to provide pro-bono legal support for our members. In addition to legal support, we reached 1500+ through 5 KYRs, safety planning workshops as well as 8 legal info-sessions for change of status or adjustment of status. The need for legal services has increased exponentially, and we have only been able to focus on the most vulnerable cases due to limited capacity of legal organizations across NYC. Many of our members are forced to pay money to for-profit lawyers, without guarantee of fair or quality service.

This year, we advocated for resources to equip our RISE Network to respond quickly and effectively to the immigration challenges facing vulnerable Asian New Yorkers. Doing the on-the-ground work takes an enormous amount of effort from our CBOs who are immensely trusted within our communities. Our CBOs are especially vital during these unprecedented times as successful immigration services require deep community involvement and linguistic competency. However, these CBOs are often not integrated into mainstream systems and processes, leaving Asian American communities isolated from the information and services they need to navigate the impact of policy changes.

Asian CBOs facing funding cuts and political threats are already spread thin, doing our best with limited resources to share information, calm anxieties, and provide help in multiple languages. We are incredibly grateful for the FY 26 City Council funding provided to our RISE Network partners to support in-language, culturally competent immigration legal services and case management. However, while Asian non-citizens make up nearly 30% of New York City's non-citizen population,<sup>1</sup> our network of Asian CBOs only received 3.9% of the additional \$50 million City Council invested in immigration legal services funding this year. We applaud the record-breaking investment in legal services funding and urge the City Council to increase its investment in Asian CBOs in FY 27 to address these gaps and meet the needs of immigrants who are under threat.

### **Recommendations**

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. We make the following recommendations to the City Council to sustain and support our work:

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<sup>1</sup> AAF's internal analysis of 2023 ACS PUMS data.



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- We support **Int 0214-2024 (Hanif)**, which will help ensure immigrants have a voice in safeguarding their dignity and well-being, and **Int 1272-2025 (Hanif)** to ensure that candidates are evaluated based on their qualifications and skills rather than their immigration status. We also support **Int 1268-2025 (Avilés)** in creating signage describing certain constitutional and legal protections and **Int 1412-2025 (Cabán)**, which would bar federal immigration authorities from maintaining offices on land over which the NYC Department of Correction exercises jurisdiction.
  - **Protect and expand funding for the following initiatives:** Legal Services for AAPI Communities; Legal Services for Day Laborers & Domestic Workers; and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
  - **Expand investment in language-accessible legal services.**
  - **Continue supporting AAF's coordination of an immigration rapid response network.**
  - **Prioritize supporting small- and mid-sized CBOs serving emerging immigrant communities.**
  - **Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.**

### **Conclusion**

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. Thank you for allowing us to testify, and we look forward to working with you to make sure our immigrant communities get the support they deserve.



**New York City Anti-Violence Project**

116 Nassau Street, 3<sup>rd</sup> Floor

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Good morning, members of the Council. My name is Leslie Allen, pronouns she/hers, and I serve as Director of Legal Services at the NYC Anti-Violence Project, where we work every day with LGBTQ+ and HIV-affected immigrant survivors of violence who are disproportionately targeted by federal immigration enforcement.

New York City is, and has always been, an immigrant city. For decades, the Council has stood behind strong sanctuary protections because our safety depends on the ability of all New Yorkers, regardless of status, to move through this city without fear that local agencies will funnel them into the hands of ICE. Those protections are not abstract. They determine whether a survivor calls 911, whether a person living with HIV seeks out the medical care needed to thrive, whether a person feels safe accessing emergency shelter.

Right now, the federal administration is escalating violent attacks on immigrant New Yorkers and directly threatening the queer and trans communities AVP serves. We are seeing increased misinformation, intimidation, and a growing fear across our client base that city systems will not protect them. We need our sanctuary laws to be given teeth-enforced with real mechanisms for accountability.

That is why AVP strongly supports the NYC Trust Act. Too many of our clients have been harmed because NYPD, DOC, or DOP ignored or misinterpreted our detainer laws. When that happens, a survivor loses far more than trust, they can lose their family, their housing, or their only source of safety. A private right of action is essential. It creates consequences for unlawful collusion with ICE and gives survivors a path to seek justice.

We urge passage of the Safer Sanctuary Act. ICE should never have an office on DOC property. Allowing federal immigration enforcement to embed itself in city jails is a direct threat to due process, to safety, and to the Council's own decades-long promise to keep our systems separate from federal deportation machinery.

AVP support Intro 1268, ensuring clear and accessible signage so New Yorkers understand their rights when approached by federal authorities. Survivors deserve to know what protections exist before they are in crisis.

AVP supports Intro 1272, We hear regularly from workers—especially trans and gender-nonconforming workers, who are sidelined or intimidated by employers misusing E-Verify. Setting a lawful order of operations is a basic safeguard against discrimination.

On behalf of AVP and the survivors we serve, I urge the Council to pass all four measures.

Thank you for your leadership and for the opportunity to testify today.



**The Arab American  
Association of  
New York**

**Testimony of the Arab American Association of New York**

New York City Hall  
Committee on Immigration Hearing  
December 8, 2025

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My name is Maryam Khaldi, and I'm the Director of Programs at the Arab American Association of New York. The City Council is considering today a number of important measures to protect and support immigrant New Yorkers. I want to highlight in particular Int-1268, which asks MOIA to create signage that clearly states which areas are public areas and which are private, and includes the rights of community members in those spaces.

For many years, the City of New York and organizations like AAANY have worked together to provide Know Your Rights trainings to community members all across the city. We share the understanding that federal and state authorities and representatives of government institutions can and will exploit vulnerable individuals who do not know the scope of their rights, and we share the commitment to building up the knowledge and power of all New Yorkers so that they can be protected and safe.

Recent ICE raids throughout New York City have undermined this work, sowing chaos and fear in immigrant communities and making New Yorkers more vulnerable to rights abuses. Int-1268 would help community members understand their rights by requiring the placement of signage in multiple languages at key locations throughout the city. We believe at AAANY that the positive impact of this resolution would be enormous and that it would go a long way toward building safety and confidence during a time where so many of us feel afraid and insecure. Moreover, it is vital that the City of New York take any steps necessary to protect its residents from unlawful attacks by ICE and codify measures that prevent collusion or support between federal immigration authorities and New York City institutions and representatives.

Thank you for your time, consideration, and commitment to New York's immigrant communities.



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**TESTIMONY OF:**

**Catherine Gonzalez**

**Associate General Counsel**

**BROOKLYN DEFENDER SERVICES**

**Presented before**

**The New York City Council**

**Committee on Immigration**

**December 8, 2025**

My name is Catherine Gonzalez, and I am Associate General Counsel at Brooklyn Defender Services. Brooklyn Defender Services (BDS) is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. BDS is grateful to the Council for holding this timely and critical hearing. We recognize that there are many questions about recent changes to federal immigration policies and enforcement that will have a significant impact on New York City. We want to thank the Committee on Immigration, particularly Chair Avilés, for inviting us to testify today about how we can continue to collaborate in protecting New York City's immigrant communities.

For nearly 30 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. After 29 years of serving Brooklyn, we have expanded our criminal defense services to Queens. We now represent approximately 40,000 people each year across two boroughs who are accused of a crime, facing loss of liberty, their home, their children, or deportation. Our staff consists of specialized attorneys, social workers, investigators, paralegals and administrative staff who are experts in their individual fields. We provide extensive wrap-around services to meet the needs of people with legal system involvement, including civil legal advocacy, assistance with educational needs of our clients or their children, housing, and benefits advocacy, as well as immigration advice and representation.

Since 2009, BDS has counseled thousands of clients in immigration matters, including deportation defense, affirmative applications, advisals and immigration consequence consultations in the criminal court system. Our *Padilla* team<sup>1</sup> attorneys are criminal-immigration

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<sup>1</sup> Named after the landmark Supreme Court decision, *Padilla v. Kentucky*, 559 U.S. 356 (2010).

specialists who provide support and expertise on thousands of cases, including advocacy regarding enforcement of New York City’s detainer law, individualized immigration screenings, and legal consultations. Since 2013, BDS has provided removal defense services through the New York Immigrant Family Unity Project, New York’s first-in-the-nation assigned counsel program for detained New Yorkers facing deportation. BDS also regularly litigates immigration cases in U.S. federal courts, including habeas petitions seeking release from unlawful detention and petitions for review before U.S. circuit courts.

BDS works at the intersection of the criminal legal and family court systems and the immigration legal system. We witness everyday how interactions with these systems expose immigrant New Yorkers to unequal treatment as they often lead to double punishment because of the negative immigration consequences they often carry even after the local matters are resolved. Even minor offenses, often the result of over-policing, can lead to mandatory incarceration in the Department of Homeland Security (DHS) detention facilities, or permanent separation from family and exclusion from this country because of the entanglement of the criminal or family legal systems and our federal immigration laws.

“[T]he immigration system’s historic reliance on criminal arrests and convictions to inform discretionary decisions about whom to detain and deport incorporates these disparities directly into the immigration system”<sup>2</sup> results in the heightened policing of Black and brown communities. An arrest alone, even where the district attorney declines to prosecute or where a judge dismisses and seals the case, can lead to immigration detention.

## **A. Overview of Federal Immigration Changes Since January**

Since January 2025, the federal government has adopted policies that dramatically widen the immigration-enforcement net and expose far more immigrant New Yorkers to arrest, detention, and deportation. Executive Order 14159 revoked prior enforcement-priority guidance and directed federal agencies to treat every removable noncitizen as a priority, regardless of criminal history, length of residence, family ties, or humanitarian considerations. The order also authorizes nationwide use of expedited removal, allowing arrests and deportations anywhere in the country without a hearing before an immigration judge. Together, these changes create an unprecedented enforcement posture in which nearly all noncitizens with any immigration vulnerability face heightened risk.

Most notably there has been a significant increase in immigration arrests due to intensified enforcement and policy changes targeting immigrants and a focus on increasing deportation numbers. According to the Migration Policy Institute, “[t]he number of unauthorized immigrants

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<sup>2</sup> Policy Brief, *Disentangling Local Law Enforcement from Federal Immigration Enforcement*, National Immigrant Justice Center (Jan. 13, 2021), available at <https://immigrantjustice.org/research-items/policy-brief-disentangling-local-law-enforcement-federal-immigration-enforcement>

and other noncitizens placed into immigration detention has grown to the highest level in history” since January.<sup>3</sup>

At the same time, federal agencies have vastly expanded their ability to identify and locate individuals for civil immigration enforcement. DHS now draws on data from the Internal Revenue Service (IRS), Social Security Administration, Department of State, criminal justice agencies, and international travel systems, creating a far-reaching information network through which people can be flagged for civil immigration enforcement. Automated database matching enables Immigration and Customs Enforcement (ICE) to initiate action not on the basis of suspicious behavior but through the most routine administrative steps, including filing taxes, renewing documents, or updating an address. Ordinary acts of compliance have now become points of vulnerability. These developments are occurring at a time when internal oversight mechanisms within DHS have been weakened or dismantled, reducing transparency and accountability in how data are used and how enforcement decisions are made.

Prior limits on where ICE could conduct arrests have also been rolled back. The rescission of the “protected areas” policy now permits ICE to carry out enforcement in locations that immigrant communities have long relied on as sensitive locations, including schools, hospitals, shelters, and places of worship.<sup>4</sup> This mirrors the courthouse arrest patterns New Yorkers experienced before the passage of New York State’s Protect Our Courts Act and has already contributed to heightened fear, reduced court participation, and diminished access to essential services.

Prior to the passage of the Protect Our Courts Act (POCA) in 2019, ICE used courtrooms, hallways, entrances and exits of court buildings to aggressively target and apprehend immigrants attending court proceedings in local criminal, family, housing, civil or other courts. This not only created suffering for the people who were arrested and subsequently detained, but it also created fear among litigants and witnesses who were afraid to appear in court to resolve their cases. POCA was passed in 2019 for the specific purpose of stopping this egregious behavior and disallowing federal immigration agents from engaging in civil arrests in New York Courts. POCA applies to all state and local courts—criminal, family and civil courts, town and village courts as well as traffic and summons courts. The law specifies that immigration agents may not make an arrest unless they have a judicial warrant, identify themselves, show a copy of the

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<sup>3</sup> Muzaffar Chishti and Valerie Lacarte, “U.S. Immigrant Detention Grows to Record Heights under Trump Administration,” Oct. 29, 2025, *available at* <https://www.migrationpolicy.org/article/trump-immigrant-detention>; *see also* Axios, “New data: ICE arrests surge as agency chases Trump quota,” Dec. 4, 2025, *available at* <https://www.axios.com/2025/12/04/trump-ice-immigration-arrests-deportations>

<sup>4</sup> As the National Immigration Law Center (NILC) notes, this long-standing policy was “repla[ced] with an unreleased directive that gives ICE agents unbridled power to take enforcement actions in any of these spaces using so-called “common sense.”” *See* Factsheet: Trump’s Rescission of Protected Areas Policies Undermines Safety for All, *available at* [https://www.nilc.org/wp-content/uploads/2025/01/2025-02.25-Protected-Areas-Fact-Sheet-English\\_.pdf](https://www.nilc.org/wp-content/uploads/2025/01/2025-02.25-Protected-Areas-Fact-Sheet-English_.pdf)

judicial warrant to court officers and judges, and await a sitting judge to authorize execution of the civil warrant.<sup>5</sup>

Moreover, since May, there have been widespread instances of ICE and Enforcement and Removal Operations (ERO) agents appearing at immigration courts to detain individuals following their scheduled hearings at immigration courts, in order to place them in expedited removal proceedings and deport them without hearings. This practice is severely undermining the fairness and integrity of immigration court proceedings. Additionally, ICE has been arresting and detaining individuals at their appointments with USCIS and at ICE check-ins.

In keeping with this broader enforcement agenda, civil immigration detention has grown significantly in scope and scale. In January, ICE instructed field offices to detain at least 75 individuals per day, totaling more than 1,800 daily detentions nationwide, compared to approximately 415 per day in 2023.<sup>6</sup> By June, the agency increased this internal target to 3,000 daily detentions. Congress further expanded mandatory detention through the Laken Riley Act, which amends the Immigration and Nationality Act (INA) to require the mandatory detention of undocumented immigrants who have been charged with a range of offenses, many of them low-level, and sharply limit judicial discretion to order release. In addition, on July 8, 2025, an ICE memo<sup>7</sup> issued guidance prohibiting bond hearings for individuals who entered without inspection or lawful admission, requiring them to remain detained for the duration of their proceedings unless ICE grants parole. These changes substantially increase the likelihood that an individual apprehended by ICE will remain in immigration detention for months or years.

At the same time, the federal government has restricted pathways that previously offered stability or protection to immigrant communities. Changes to asylum standards, heightened eligibility requirements, limitations on humanitarian parole, and narrowed interpretations of Temporary Protected Status have reduced the avenues through which individuals may seek safety or lawful status.

Together, the federal actions implemented since January have created a policy landscape that is broader in scope, faster in its operation, and more heavily enforced than at any point in recent memory. These developments heighten the urgency of ensuring that New York City does not

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<sup>5</sup> Protect Our Courts Act, New York State Senate Bill S425A, *available at* <https://legislation.nysenate.gov/pdf/bills/2019/S425A>

<sup>6</sup> Arya Sundaram, “NY, NJ immigration enforcement offices now have quotas. It’s 75 arrests a day or else, report says,” *Gothamist*, Jan. 27, 2025, *available at* <https://gothamist.com/news/ny-nj-immigration-enforcement-offices-now-have-quotas-its-75-arrests-a-day-or-else-report-says> Priscilla Alvarez, “How the Trump administration is building out its immigration enforcement machine,” *CNN*, Feb. 2, 2025, *available at* <https://www.cnn.com/2025/02/02/politics/trump-immigration-enforcement>

<sup>7</sup> Immigration Policy Tracking Project, “ICE issues memo eliminating bond for all applicants for admission” Jul. 8, 2025, *available at* <https://immpolicytracking.org/policies/ice-issues-memo-eliminating-bond-hearings-for-undocumented-immigrants/>

facilitate federal immigration enforcement and that city agencies uphold the strongest possible protection for the communities we serve.

## **B. New York City Detainer Discretion Laws**

The New York City Council continues to be a leader in protecting the rights of New Yorkers and ensuring New York remains a place where all our communities can feel safe and thrive. In October 2014, the Council passed groundbreaking legislation—detainer discretions laws—that removed ICE from Rikers Island, and limited the New York City Department of Corrections (DOC), the New York City Police Department (NYPD), and the Department of Probation (DOP) from unlawfully detaining noncitizens for the purposes of civil immigration enforcement or cooperation with ICE without a judicial warrant signed by a federal judge establishing that there is probable cause to take the person into custody.

These laws were intended to reshape how local agencies use their resources for the purpose of federal civil immigration enforcement. For decades, prior to the passage of the detainer discretion laws, federal immigration enforcement, primarily through ICE, maintained a direct presence within the New York City criminal legal system, particularly through the identification of noncitizens in jails for potential deportation and physical presence at Rikers. As a result, many people were being held in city jails past their release dates so that ICE could assume custody. City agencies like NYPD and DOC were assisting with civil immigration enforcement under these programs after receiving detainers from ICE. Detainers are written requests issued by ICE to ask local authorities to hold individuals to allow ICE to assume custody. Detainers on their own cannot compel local agencies to detain individuals beyond their release time. Courts have ruled that without a judicial warrant, reliance on detainer requests alone raises serious constitutional concerns.<sup>8</sup>

More specifically, pursuant to the detainer laws, NYPD and DOC may not honor a detainer request issued by ICE unless ICE presents a judicial warrant from an Article III federal judge or a federal magistrate judge, which establishes that there is probable cause that the individual sought is subject to arrest by ICE. Even where ICE presents a judicial warrant, NYPD and DOC may not honor a request by ICE to hold an individual for ICE to assume custody unless the

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<sup>8</sup> See *People ex rel. Wells o.b.o. Francis v. DeMarco*, 168 A.D.3d 31 (2d Dept 2018) (holding that New York State law enforcement officers only have arrest authority granted to them by New York State law and that New York State law does not authorize arrests based solely on a civil immigration violation. New York State law authorizes arrests on the basis of a warrant issued by a court or other competent authority, which ICE detainers and administrative “warrants” are not); see also *Onadia v. City of New York* (a class action settlement of up to \$92.5 million with regards to claims by individuals who were unlawfully detained by the NYC DOC solely on the basis of an ICE detainer between April 1, 1997 and December 21, 2012); and *Orellana Castañeda et al. v. County of Suffolk and Suffolk County Sheriff’s Office et al.*, (a jury awarded \$112 Million to 674 individuals unlawfully held by Suffolk County for ICE).

individual has been convicted within the last five years of a “violent or serious crime”<sup>9</sup> or the individual is found to be a possible match on the terrorist watch list. The law also contains an exception that allows NYPD to hold certain individuals for a limited period of time without a judicial warrant. The law anticipates that this is for the purpose of providing ICE with sufficient time to seek such a judicial warrant. The law specifies that if within that time ICE secures a judicial warrant, only then may NYPD transfer a narrow additional class of individuals to the custody of ICE.

As public defenders representing people accused of crimes, we saw firsthand how ICE agents profiled and coerced people in DOC custody at Rikers prior to the passage of the 2014 detainer laws. ICE’s prior activities at Rikers violated due process and targeted New Yorkers based on racial and national-origin profiling. ICE interrogated people without identifying themselves, coercing people to share information. The actions of ICE agents, including arresting people upon release from Rikers, prevented many people from fighting their state charges and interfered with the New York legal system. These detainer discretion laws were intended to protect New Yorkers’ due process rights. However, contested interpretations of the law, along with recent developments and implementation challenges continue to highlight gaps in the detainer discretion laws.

## ***Gaps in the Detainer Discretion Laws***

Although the 2014 detainer discretion laws were enacted to prevent New York City agencies from facilitating civil immigration enforcement without a judicial warrant, ICE has continued to exploit several gaps in agency practice to obtain custody of New Yorkers.

During an oversight hearing before the New York City Council in February 2023, DOC testified that it interprets the 2014 detainer discretion laws to contain an exception which allows DOC to notify the Department of Homeland Security (DHS) of an individual’s release based on a finding of “dangerousness,” as established by a recent criminal conviction for one of the enumerated 177 offenses, or inclusion on the FBI’s terrorist watch list.<sup>10</sup> Once ICE is notified of the person’s impending release, ICE is free to show up at the DOC facility and take custody of the person directly from DOC.

This exception has led to New Yorkers being arrested by ICE agents immediately upon their release from DOC custody and, in essence, a fluid transfer to immigration custody. What these instances reveal most is that there is a lack of transparency. We do not have information about

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<sup>9</sup> The term “violent or serious crime” is defined in the new law by reference to a list of 177 enumerated felonies.

<sup>10</sup> New York City Council Hearing “Oversight - New York City’s Detainer Laws,” Committee on Immigration Jointly with the Committee on Criminal Justice, February 15, 2023, 10:00 AM, meeting video available at <https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1078800&GUID=54D0B5D1-9B0B-4A5D-B7C3-F6E67806FBC5&Options=info|&Search=#>

the actual communication between DOC and ICE. We do not know whether clients for whom DOC receives an ICE detainer are released after the same amount of time as a client with no ICE detainer. DOC does not notify defense counsel when they respond to a request for notification from ICE. Instead, upon our inquiry before each client's anticipated release date from DOC custody, we are informed generally that the individual was to be released pursuant to the DOC detainer law. Subsequently, BDS has not been informed about the release of an individual to ICE custody directly from DOC custody.

We understand that DOC facilitates the transfer of individuals to ICE custody based on the notification exception, when people have a qualifying conviction. The spirit behind the detainer discretion laws was to ensure that New York City protected its noncitizen residents. NYC should not deny New Yorkers this protection because of a criminal conviction.

The City Council should make clear that city agencies cannot communicate with ICE about an individual for the purposes of civil immigration enforcement without the presentation of a judicial warrant. DOC's interpretation of the law as allowing communication with ICE without a judicial warrant is not in line with the spirit of the law. The city cannot adequately protect New Yorkers, or uphold the detainer discretion laws, without upholding the requirement that ICE present a judicial warrant in interactions with city agencies about an individual for the purpose of civil immigration enforcement.

A second gap arises from the ongoing communication and information-sharing practices of the Department of Probation. Although the detainer laws restrict the ability of city agencies to honor civil detainees, as public defenders we know that when conducting pre-sentence investigation reports, the Department of Probation regularly communicates with ICE for information. This gap creates a risk that a city agency's internal processes are used to carry out federal civil enforcement without a judicial warrant.

By leveraging routine probation operations as an informal intelligence-gathering mechanism, ICE continues to draw noncitizen New Yorkers into the immigration enforcement system through precisely the types of local-government touchpoints the detainer laws were designed to insulate. This exploitation of supervisory structures undermines both the purpose and the practical effect of the Council's reforms and heightens the risks faced by individuals who are otherwise complying with all court-imposed obligations.

In 2025, the Adams administration issued Executive Order 50 authorizing federal immigration authorities to open an office at Rikers Island under the premise that it would be for the limited purpose of assisting with criminal investigations related to gang and drug offenses. Executive orders are not subject to public legislative debate and can temporarily expand ICE access, increase data sharing, or authorize broader cooperation, even when these actions conflict with the spirit of existing laws. We saw this danger materialize in 2025 when Mayor Eric Adams issued Executive Order 50, although the order did not explicitly dismantle the protections established in

2014, it created operational exceptions that signaled to agencies that heightened communication with ICE was permissible.

The issuance of NYC Executive Order 50 earlier this year profoundly magnified fear in immigrant New Yorker communities. Since then, many of the people we serve and their families have expressed real fear - not only that being incarcerated Rikers might expose them to ICE, but even that simply visiting a loved one there could subject someone to immigration enforcement.

That fear has lingered even after Judge Rosado's ruling that the order is “null and void”. Though the court decision brought finality to the issue, in the time since then, many of the people we represent, and their families continue to express heightened anxiety at any contact with Rikers out of fear ICE might still show up or that their presence there could trigger immigration enforcement.

## **C. What Immigrant New Yorkers Face in Detention**

Brooklyn Defender Services has long documented that immigration detention functions as a system of incarceration marked by punitive and dangerous conditions. Detained New Yorkers are routinely held in facilities that mirror the harshest aspects of jails: overcrowded dorms, inadequate medical care, extended isolation, unsanitary living conditions, and degrading treatment by staff. The situation worsens when ICE transfers people to remote jails, often out of state, where family contact becomes nearly impossible and oversight is even weaker. These conditions reflect systemic failures that inflict profound physical and psychological harm on people who have not been accused of any new crime and whose custody is purely civil in nature.

BDS’ work representing detained immigrants makes clear that these conditions are compounded by profound barriers to due process. Unlike in the criminal legal system, people in immigration detention have no right to appointed counsel and must navigate one of the most complex areas of law from within facilities that severely limit communication. BDS repeatedly reports that detained clients struggle to access phones, gather documents, consult with attorneys, or understand the legal claims against them. Transfers to far-away jails routinely sever existing attorney-client relationships. These barriers make it extraordinarily difficult to challenge removal. Many are deported rapidly, sometimes within days or weeks, through expedited processes that offer little opportunity for meaningful review.

Immigration detention is not a neutral administrative mechanism but a punitive system that strips people of safety, family connection, and due process. It underscores why even minimal information-sharing by city agencies can trigger life-altering consequences for immigrant New Yorkers.

## Recommendations

### *Strengthen and Codify Protections Against ICE Presence in City Jails*

Brooklyn Defender Services urges the Council to adopt Int. 1412-2025 to reinforce and strengthen the protections established by Local Law 58. Local Law 58 was enacted to prohibit federal immigration authorities, including ICE, from operating an office or maintaining a presence on Rikers Island for purposes of civil immigration enforcement. That protection was tested in 2025 when the mayor issued Executive Order 50, seeking to allow ICE and other federal agencies to return to Rikers in direct contravention of the law. Although a New York State Supreme Court judge ruled on September 8, 2025, that the executive order was “null and void,” the episode exposed how vulnerable these protections remain when they can be circumvented through unilateral executive action.

Int. 1412 addresses this vulnerability by explicitly prohibiting ICE or any federal immigration authority from maintaining offices, quarters, or operational space in any Department of Correction facility, not only on Rikers Island. The bill also modernizes and clarifies the definitions of immigration enforcement and makes clear that no executive order, memorandum of understanding, or similar instrument may override these statutory protections. By closing the gaps revealed during the 2025 executive order attempt, Int. 1412 ensures that City jails cannot be repurposed as sites of federal immigration enforcement and that the intent of Local Law 58 cannot be undermined through administrative reinterpretation.

We recommend swift passage of Int. 1412 to provide clarity, stability, and enforceable safeguards against future attempts to restore ICE’s presence within New York City’s jail system and to ensure that immigrant New Yorkers can interact with City systems without fear of civil immigration enforcement.

### *Pass Int. 214-2024*

Brooklyn Defender Services supports the passage of Int. 214-2024, which would strengthen the enforceability of New York City’s existing detainer protections. As described earlier in our testimony, ICE has been able to rely on communication practices at DOC, information-sharing within Probation, and shifts in executive policy to facilitate civil immigration arrests despite the framework the Council established in 2014. Int. 214 responds to these concerns by creating a private right of action, allowing individuals to seek judicial review when City agencies engage in cooperation or communication with ICE that violates municipal law. This mechanism reinforces the requirement that City agencies adhere to the statutory limits on civil immigration enforcement, regardless of internal interpretations or external pressure.

By establishing a means of accountability, Int. 214 helps ensure that the protections set out by the Council are meaningful and that agencies cannot rely on informal communication channels or executive directives to circumvent the judicial-warrant standard. We support its passage and

view it as an important step in ensuring that city systems do not serve as conduits for civil immigration enforcement.

## ***Eliminate the Gang Database***

Brooklyn Defender Services strongly urges City Council to pass Int. 798 to permanently abolish the NYPD's criminal group database, commonly called the gang database. Since its creation, this database has been a tool of mass surveillance and racialized policing that disproportionately targets Black and Latine youth, criminalizes association rather than conduct, and operates without transparency, accountability, or due process. It has failed to enhance public safety and instead facilitates unconstitutional policing practices that harm the very communities the NYPD claims to protect. We've already seen ICE rely on false gang allegations to justify arrests and deportations.<sup>11</sup> New York City cannot allow discriminatory databases to become a backdoor to ICE enforcement.

The harms of the gang database are not theoretical—they are borne by real young people whose lives are shaped by relentless police surveillance and harassment. The transition from widespread stop-and-frisk to expansive data policing has not reduced racial disparities; it has only made them more insidious. Our clients experience persistent police scrutiny, unjustified stops, and coercive interrogations simply because they live in over-policed communities. The gang database also causes Black and Latine immigrants to be more susceptible to immigration detention and deportation based on little more than where they live and who they are friends with; this risk of separation from their families and communities is particularly acute after the recent designation of certain gangs as terrorist organizations. Moreover, young asylum seekers who are fleeing violence from gangs in their home countries are often themselves erroneously labeled as gang members. Through the gang database, the NYPD has taken the worst elements of racial profiling and rebranded them as intelligence gathering. This is not a move toward justice but a deepening of surveillance-based policing that treats Black and Latine youth as suspects before they even have a chance to grow up.

## **Conclusion**

All New Yorkers benefit when our diverse communities can thrive together. As this Council has always noted, immigrants, regardless of their status, are the backbone of our city, our culture and our economy. New York City has long made efforts to reassure our communities that the city

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<sup>11</sup> Recent investigations show that federal immigration authorities have used unsubstantiated allegations of “gang affiliation,” without presenting credible evidence, to classify Venezuelan men as members of the Tren de Aragua gang and remove them under the Alien Enemies Act, resulting in transfers to highly restrictive facilities such as El Salvador's CECOT prison. See Human Rights Watch, *Punished for Seeking Change: Killings, Enforced Disappearances and Arbitrary Detention Following Venezuela's 2024 Election* (Apr. 30, 2025); Julie Turkewitz & Hamed Aleaziz, *Family of Venezuelan Migrant Sent to Guantánamo: “My Brother Is Not a Criminal”*, N.Y. Times (Feb. 11, 2025).



welcomes and protects all New Yorkers, including its immigrant community. We applaud our City Council's leadership in forging city policies and laws that center the protection of all New Yorkers. However, immigrant communities continue to face an enormous threat in an era of increased surveillance and immigration enforcement. The city can and should do more to ensure that residents are not unnecessarily targeted for detention or deportation because of some action or failure to act by the city.

The City Council has played a critical role in safeguarding New York City's immigrant community and established itself as a national leader in the creation and ongoing support of the NYIFUP program. We thank the New York City Council for its continued support of low-income immigrant New Yorkers. This support and the need for our services is more acute than ever.

If you have any questions, please feel free to reach out to Catherine Gonzalez at [cgonzalez@bds.org](mailto:cgonzalez@bds.org).



**New York City Council Fiscal Year 2026  
Committee on Immigration**

*Testimony of Sherry Chen, Health Policy Coordinator  
Coalition for Asian American Children and Families*

**December 8, 2025**

Thank you to Council Member Avilés, Chair of the Committee on Immigration, and Council Member Caban and Council Member Hanif for hosting this hearing. I am Sherry Chen, and I am the Health Policy Coordinator at the Coalition for Asian American Children and Families (CACF). We are the nation's only pan-Asian organization advocating for children and families. Our coalition consists of over 90 members organizations across New York State that serve our diverse Asian American and Pacific Islanders (AAPI) communities.

While the AAPI community comprises nearly 18% of New York City's population and 11% of New York State, both the community itself and the organizations that serve it frequently lack sufficient resources to support its most vulnerable members. Moreover, the model minority myth overlooks the fact that AAPIs face high levels of poverty, overcrowding, uninsurance, and linguistic isolation. In partnership with over hundreds of organizations as well as youth and caregivers across New York State to identify and speak out on the many common challenges our community faces, CACF is fighting for equity and opportunity for marginalized AAPIs - building a community too powerful to ignore.

**CACF is in full support of the passage of Int. 214, Int. 1268, Int. 1272, and Int. 1412 in continued efforts to protect our immigrant New Yorkers.** We are particularly in support of Int. 214 and Int. 1268 for the following reasons:

**INT. 214**

Enforcing data-sharing laws is essential for community safety, ensuring residents are not afraid to access public services and benefits, and holding local agencies accountable for potential violations of New Yorkers' safety. This is crucial for protecting immigrant communities and preventing family separation, which inflicts significant trauma and has exacerbated the AAPI mental health crisis, especially for youths. Direct service community-based organizations (CBOs) report an increase in youth, including young children, needing care for trauma stemming from witnessing parents or family

members being taken away by U.S. Immigration and Customs Enforcement (ICE) personnel. This provision helps counter anti-immigrant sentiment by empowering immigrants legally to defend themselves and directly addresses evidence of collusion between the NYC Department of Corrections (DOC) and ICE in violation of NYC's sanctuary laws.

This legislation is essential for upholding the stability of several vital community areas:

- **Health:** the bill ensures communities feel secure in accessing health benefits and continuing to seek medical care. Current threats to data-sharing and privacy, such as between the U.S. Center for Medicare and Medicaid Services (CMMS) and ICE have created "chilling effects" amongst immigrant communities, causing individuals to become fearful of enrolling or re-enrolling in benefits they are eligible for, even going so far as to cause individuals to disenroll from Medicaid. This access barrier results in an overall less healthy population and carries negative economic implications when considering its impact on the workforce. Int. 214 will allow accessible and affordable health programs, such as NYC Cares, to continue reaching as many New Yorkers as possible by adding a layer of protection for those who may initially be fearful that their enrollment data will be used against them. Compared to other racial and ethnic groups, AAPIs are 50% less likely to seek mental health services. This, combined with the fear of being targeted, will lead more community members to suffer in silence.
- **Education:** fear of data being shared with ICE will lead to families continuing to hold their children from school and accessing school-related services for fear of them being targeted, thereby negatively affecting their education. For immigrant children, especially those who rely on critical supplemental programs such as English language learner (ELL) or special education support, inconsistent attendance further affects their academic progress. Furthermore, holding children from school impedes on their mental health, likely contributing to anxiety and other stressors. In a 2024 study, nearly 10% of AAPI youth reported suicide ideation, and the suicide rate has continued to steadily increase.
- **Domestic violence:** victims of domestic violence will feel safer approaching relevant authorities to file incidence reports if they understand that their identifying information will not be shared with federal agencies. This empowers more victims to seek protection and advocacy without added fear of experiencing further trauma of being detained. In the U.S., a significant percentage of AAPI women, roughly 50%, have experienced gender-based violence during their lifetime, and 18% of AAPI women have experienced physical violence or threats from an intimate partner.

## **INT. 1268**

CACF strongly supports Int. 1268's focus on ensuring all New Yorkers know their rights in regards to

interactions with federal immigration personnel particularly as it relates to disseminating resources that are linguistically accessible. This includes providing signage and resources in the designated languages as identified by the city for translation of official documents and materials. CACF recommends the city to ensure the coverage of translated materials can extend beyond the ten designated citywide languages to include other languages, particularly as it is relevant to the neighborhoods materials will be distributed in, to ensure that more New Yorkers are able to access linguistically-responsive resources to stay informed. One of the barriers to linguistic accessibility is the unaccounted for dialects that AAPI New Yorkers speak; the AAPI community speaks half of the most spoken non-English languages, yet languages with large speaker populations, such as Vietnamese and Tagalog, are not often provided translation for especially when it comes to official communications materials.

Integrating community outreach and education efforts with community-based nonprofits and organizations (CBOs) is essential, as these groups have direct and frequent interaction with the community and are trusted by community members, especially those who are limited English proficient (LEP). The city must be prepared to support CBOs during the implementation of this bill by providing them with training and ensuring they will have continued access to the necessary signage and materials for distribution to community members.

**In conclusion, we strongly urge the City Council to pass Int. 214, Int. 1268, Int. 1272, and Int. 1412.** These measures, particularly as described above, are essential steps to safeguarding the wellbeing of our immigrant neighbors by extending further protections for data privacy violations and upholding the fundamental promise that New York remains a sanctuary city committed to protecting its vulnerable.

Sincerely,

Sherry Chen

Health Policy Coordinator, **Coalition for Asian American Children and Families**

Common Cause New York  
Written Testimony before the New York City Council  
Committee on Rules, Privileges, and Elections  
December 8, 2025

Re: Intro 214, Intro 1268, Intro 1272, and Intro 1412

Good morning Chair Aviles, and members of the Committee. My name is Samantha Sánchez, and I am submitting testimony on behalf of Common Cause New York, a nonpartisan good-government organization dedicated to strengthening democracy, transparency, and public accountability in New York City and across the state.

New York City is, and has always been, an immigrant city. Over decades, this Council has enacted sanctuary protections to ensure that City agencies, resources, and personnel are not used to support federal immigration enforcement. These protections reflect a long-standing bipartisan commitment to trust, safety, and local sovereignty.

Today, as the federal administration escalates attacks on immigrant communities and increasingly blurs the boundaries between local and federal authority, it is crucial that New York City strengthen and enforce its sanctuary framework. The four bills before you—Intro 214, Intro 1268, Intro 1272, and Intro 1412—work together to protect due process, prevent workplace intimidation, enforce sanctuary laws, and limit federal overreach inside City institutions.

Common Cause New York strongly supports all four bills.

### **Support for Intro 1268: Signage Describing Constitutional and Legal Protections (Avilés)**

Intro 1268 requires the Mayor's Office of Immigrant Affairs (MOIA) to design and post clear, multilingual signage on City property and in schools informing people of their constitutional rights and of the limits on federal immigration authority.

For Common Cause New York, this legislation reflects a core principle of good governance: residents cannot meaningfully exercise their rights unless they know what those rights are. In environments where ICE activity has historically caused fear and confusion, clear signage helps prevent coercion, restricts unauthorized federal access, and strengthens local control over City buildings.

This legislation also brings New York City in line with national best practices. Chicago, for example, strengthened its Welcoming City Ordinance and the "Protecting Chicago" executive framework to:

- Strictly limit federal immigration agents' access to City property,

- Require clear protocols for frontline staff,
- Prohibit cooperation with ICE absent a judicial warrant, and
- Ensure residents have accessible information about their rights.

Like Chicago, New York City can use clear, standardized rights information to safeguard due process, reinforce sanctuary laws, and prevent federal authorities from circumventing municipal protections.

We note that New York City government is itself the largest property owner in New York City. In addition to providing information where a significant number of New York City residents will see this essential information, the City is modeling appropriate behavior that property owners can and should take.

#### *Recommendations to Strengthen Intro 1268*

To maximize implementation and reach, Common Cause New York respectfully recommends:

##### 1. Community Involvement and Feedback

Require MOIA to consult with immigrant-serving organizations, legal service providers, and community groups to ensure signage is accurate, culturally appropriate, and comprehensible.

##### 2. Clear Posting of Public vs. Private areas

In addition to the signage required in the current version of Int. 1268, further require that the Department of Citywide Services (DCAS) post signage which clearly demarks the areas of city buildings which are public and those sections which are private and clarify that the requirements of the law apply to DCAS in its administrative custodial role as well as to individual agencies.

##### 3. Staff Training Across Agencies

Frontline and security personnel should receive regular training by DCAS on:

- The meaning and purpose of the signage,
- How to explain non-public areas,
- Protocols for properly responding to ICE presence.

Signage is effective only when staff understand and uphold the protections behind it.

##### 3. Clear Oversight and Reporting Requirements

DCAS should report:

- Which City-owned buildings received signage,
- Criteria used for placement,
- Distinctions between City-owned and leased properties,
- How building security is instructed to enforce non-public areas.

#### 4. Enforceability and Accessibility

- Establish compliance metrics for City agencies and contractors,
- Ensure signage is available digitally in accessible formats.

#### **Support for Intro 214: The NYC Trust Act (Hanif)**

Intro 214 adds a private right of action for individuals harmed when City agencies unlawfully share information with ICE or violate sanctuary policies. Sanctuary laws must be enforceable to be meaningful. This bill strengthens accountability, deters violations, and reinforces immigrant trust in public institutions.

#### **Support for Intro 1272: Preventing Misuse of E-Verify (Hanif, Sanchez, Cabán, Marte, Gutiérrez, Nurse, De La Rosa)**

Intro 1272 prevents employers from using E-Verify prior to a job offer, closing the door to intimidation, discrimination, and informal “immigration screenings.” Workers should not be punished for seeking economic opportunity, nor should employers misuse federal systems to undermine worker rights.

#### **Support for Intro 1412: Prohibiting Federal Immigration Offices on DOC Property (Cabán)**

Intro 1412 prohibits federal immigration enforcement agencies from maintaining offices on Department of Correction property, preventing ICE from reestablishing a physical presence on Rikers Island or similar facilities. This bill closes key loopholes and ensures sanctuary protections apply across all DOC properties.

#### **Conclusion**

Together, Intros 214, 1268, 1272, and 1412:

- Strengthen sanctuary protections,
- Increase transparency and public awareness of rights,
- Protect workers from coercive misuse of immigration systems,
- Hold City agencies accountable,
- And prevent federal agencies from encroaching on municipal authority.

These are hallmarks of strong democratic governance.

Just as Chicago implemented robust sanctuary structures to safeguard its residents and limit federal overreach, New York City must reinforce its own protections to ensure that immigrant New Yorkers can safely interact with government institutions—without fear, confusion, or coercion.

We urge the City Council to pass this full sanctuary package. Thank you for the opportunity to provide testimony.

**PLEASE CONTACT SAMANTHA SANCHEZ AT (646) 465-1321 WITH ANY QUESTIONS.**



# COUNCIL OF PEOPLES ORGANIZATION

IT'S ALL ABOUT PEOPLE HELPING PEOPLE  
WWW.COPO.ORG

## Testimony to the New York City Council Committee on Immigration

December 8, 2025

### Testimony

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration, for holding this hearing and for giving us the opportunity to testify. My name is Mohammad Razvi, and I am the Founder and CEO of the Council of People's Organization (COCO). At COPO, it's about people helping people. **Each year, COPO serves more than 60,000 New Yorkers.**

Our organization provides immigration legal services, case management, and critical social support to immigrant families across New York City, helping them navigate complex legal systems, access resources, and secure safety and stability.

We are proud to be part of the RISE Network, a coalition of nearly 20 Asian-led and Asian-serving organizations providing coordinated immigration legal services and case management. This partnership allows us to strengthen outreach, share resources, and respond rapidly to urgent legal needs across our communities.

Today, COPO strongly supports the legislative items before the Committee.

- **Intro 0214** will allow community members to hold agencies accountable for improper civil detainers, reinforcing due process and trust in our local systems.
- **Intro 1268** ensures that immigrants have clear, accessible information about their constitutional rights — a simple step that can make the difference between fear and empowerment.
- **Intro 1272** prevents the misuse of E-Verify before a job offer, protecting workers from discrimination and unnecessary surveillance.
- **Intro 1412** restricts federal immigration enforcement from operating within DOC properties, helping preserve community trust and safeguarding our local services.

These bills align with what we see every day. Fear of immigration enforcement is growing. Families are skipping appointments, avoiding government buildings, and even hesitating to come to our Friday food pantry. We've seen a **20% drop in in-person attendance**, not because the need has decreased, but because families are afraid.

Meanwhile, the demand for immigration legal support continues to rise. With only **three attorneys and one paralegal**, COPO can serve about 70 clients a month — yet our waitlist has grown to **more than 200 people**. Through the RISE Network, we are doing everything we can to meet this need, but the volume of cases reflects how urgent the situation is for immigrant families.

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# COUNCIL OF PEOPLES ORGANIZATION

**IT'S ALL ABOUT PEOPLE HELPING PEOPLE**  
**WWW.COPO.ORG**

These legislative measures will help reduce fear, protect rights, and strengthen the trust that organizations like ours rely on to connect families to safety, services, and stability.

At COPO, it has always been about people helping people. With your support, we can continue to expand these vital services and ensure that immigrant New Yorkers feel protected, informed, and never alone.

**Thank you for the opportunity to testify.**

**Mohammad Razvi**  
Founder & CEO

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Freedom  
Agenda

**Testimony to the New York City Council Committee on Immigration**  
**Submitted by Darren Mack, Co-Director, Freedom Agenda**  
**December 8, 2025**

Thank you Chair Aviles and committee members for holding this hearing. My name is Darren Mack, and I'm Co-Director of Freedom Agenda. Our members have been incarcerated at Rikers or had loved ones detained there. They have seen and been subjected to the incompetence and cruelty of the Department of Correction, as well as the NYPD. When people are incarcerated, DOC all too often acts as if they can do whatever they want to people. In February of 2023, this committee held an oversight hearing that revealed that DOC staff had been deliberately colluding with ICE to transfer immigrants to ICE custody in violation of our laws. A captain even sent emails using the hashtag #teamsendthemback. Earlier this year, a report by the city Department of Investigation found that a DOC investigator shared sensitive information with ICE that led to the arrests of two immigrants in violation of city law. Whether guards are intentionally breaking the law, acting carelessly, or haven't been trained well, the damage done to New Yorkers who should have been protected by our sanctuary laws, and to their family and communities, is deep and long-lasting. People in DOC custody are already so vulnerable to abuse by correction officers, and that vulnerability is even greater when they are non-citizens.

We've seen how far the Trump administration will go in its efforts to detain and deport immigrant members of our communities. We have also witnessed Eric Adams attempts to undermine our city's longstanding, hard-fought protections for immigrant New Yorkers to serve his own self-interest.

**The City Council must pass the New York City Trust Act to ensure that our sanctuary laws are complied with.** We urge passage of the New York City Trust Act (Intro. 214-2024), which will create a private right of action so that people wronged by violations of these laws can seek justice in court. Immigrant New Yorkers and their communities suffer long-term harm when New York City agencies ignore and misinterpret local detainer laws. This bill would make sure that all city agencies can be held accountable when this happens, helping ensure compliance and prevent family separation.

**The City Council must also ensure that ICE is never allowed to return to Rikers Island**

Despite the clear intent of the City Council based on updated detainer laws passed in 2014, outgoing Mayor Eric Adams attempted to exploit language in the current law by issuing an executive

order to restore the shameful presence of ICE on Rikers. We are grateful that the Council took quick action to sue the administration, leading to the state court striking down the Mayor's effort. But this horrifying move by a corrupt mayor raised the need to tighten and clarify our detainer laws. It's important to constantly point out that Rikers Island – and any jails the City will operate in the future – are primarily places where legally innocent people are detained while awaiting trial. Like the corrupt, racist judge that Rikers Island is named after, DOC and ICE do not care about due process. These are agencies where any accusation, along with being poor, a person of color, or being an immigrant, are considered evidence enough to justify removing people from their communities.

Intro. 1412-2025 would remove any ambiguity about the purpose of the detainer law by clearly prohibiting federal immigration authorities from maintaining quarters on DOC property for any purpose. The bill would also revise how immigration authorities are defined to reflect the broad ways in which federal entities are being weaponized to enforce immigration law. We need to make sure that our laws bar collusion with immigration enforcement plainly and completely.

**The time to act is now.**

With billions of dollars in new funding, the Trump administration's assault on immigrants will likely only escalate. New York City needs to be prepared for what is to come and not waver when it comes to protecting the rights of the millions of foreign-born residents, including our members, who call this city their home. The Council must act now to pass the New York City Trust Act and Intro. 1412, and continues to explore ways to fortify and bolster our proud tradition of refusing to collude with immigration authorities.

Thank you,

Darren Mack

Co-Director, Freedom Agenda

[Dmack@urbanjustice.org](mailto:Dmack@urbanjustice.org)



New York City Council Committee on Immigration  
Testimony of KC Wagner, **Hand in Hand: The Domestic Employers Network**  
December 8, 10AM

Thank you to the Committee on Immigration for holding this hearing. My name is KC Wagner, and I am a member of **Hand in Hand: The Domestic Employers Network**, a national organization of families, older adults, and disabled New Yorkers who employ care workers — including nannies, home care workers, and house cleaners.

Immigrant care workers, many of whom are undocumented, have green cards, or are naturalized citizens, are facing real threats. ICE continues to racially profile and collude with city agencies like the NYPD and Department of Corrections, putting families and workers at risk of detention, deportation, and family separation. These attacks don't just harm individuals, they **undermine the care systems we all rely on**.

As a member of Hand in Hand, we also partner with domestic worker community based organizations and New York affiliates of the National Domestic Workers alliance, in addition to local electeds. And I raise my glass to Councilmember Hanif in her incredible support of the work that we have done with Carroll Gardens Neighborhood Association. I am a proud and eternally grateful granddaughter to both my sense of grandparents who came through Ellis island and became naturalized citizens. I am also a proud and eternally grateful past employer of four immigrant caregivers to my elderly mother as she suffered with dementia over a decade, especially when they were there during her dying days. They provided love, compassion and provided eternal support so that they made my ability to work possible

**That's why I'm here to urge passage of the NYC Trust Act (Intro 214).**

This bill would create a **private right of action**, allowing anyone whose rights are violated by city agencies to bring a lawsuit and hold those agencies accountable. Right now, violations of NYC's sanctuary laws happen regularly, including documented cases of the DOC and ACS sharing information with ICE, but there is **no clear way to enforce the law** or seek recourse.

Strong sanctuary protections are essential not only for immigrant safety, but for the **health and stability of our city as a whole**. When immigrant New Yorkers fear local agencies, it erodes trust, discourages reporting of crimes, and prevents families from accessing essential services. Passing the



Trust Act ensures that **city agencies cannot violate these protections with impunity**, and that immigrant families can live without the constant fear of detention or separation.

I urge the City Council to act swiftly to pass the NYC Trust Act and protect the safety, dignity, and rights of immigrant New Yorkers. Thank you.

**New York City Council Committees on Immigration**  
**December 8, 2025 at 10AM**

**Testimony of Yasmine Farhang, Executive Director, Immigrant Defense Project**

Thank you to this Committee for holding this hearing. My name is Yasmine Farhang and I am the Executive Director of the Immigrant Defense Project. IDP was founded almost 30 years ago to combat the targeting of immigrants for mass deportation and to fight for justice for ALL immigrants - in particular, those targeted by the racist criminal and immigration legal systems. We are also a lead organization in the ICE Out! NYC coalition which brings together dozens of organizations with a simple mission: to unequivocally end the use of our local resources to facilitate the mass deportation of our neighbors.

Sanctuary is many things - it is a policy, it is a set of laws, but it is also a value. Sanctuary is how we say that as a city, we support and respect immigrants within our community. It is how we acknowledge their place as a vital part of the fabric of our city. Concretely, we're demanding that the city guarantee us that the people who work for our local institutions will not be secret agents of ICE. No parent registering their child for public school should be concerned the information they give will be used to deport them. And it is unjust for immigrant New Yorkers - disproportionately Black immigrants and other immigrants of color who are targeted for arrest by NYPD and jailed by DOC- to have to worry that their own city will doubly punish them - by funneling them to ICE for detention and deportation.

We - IDP, the community organizations and legal advocates here today - have sat before this Council too many times in the last several years - before this mayoral administration and throughout this one - to shine light on how violations of our existing laws result in severe, life-changing, consequences to the lives of immigrant New Yorkers. We also unveiled thousands of pages of email correspondence between the Department of Corrections and ICE showing a deep culture of collusion between DOC and ICE showing:

- *routine* illegal communication,
- frequent delays and slow downs of people's release to facilitate their arrest by ICE, and,
- an email signed #teamsendthemback and evidence of regular, unrecorded communication.

To date, this administration - including this Mayor's Office of Immigrant Affairs - has done nothing to address this, and the DOC has denied our FOIL requests for an update.

And in the past year, the unfathomable violence and harm that ICE is carrying out on immigrant New Yorkers every day exposes too clearly the weakness in our laws. Yes, we must raise our voices at the daily harms in immigration court, but we must likewise to do where it can't be seen as easily by the public -

at Rikers, at local police precincts, on residential streets in immigrant neighborhoods where the NYPD is already heavily present - all sites of violence where the city is at the center.

We are calling on this Committee today to mark the end of one year of this federal administration with real, concrete action:

- To ensure that city agencies who are the worst culprits when it comes to systematically violating our laws are held accountable - through policy change and money damages - if they violate them, by passing the **NYC Trust Act**. With national guard and increased militarization at cities around the country, we simply cannot be left to wonder if NYPD, DOC and DOP who already perpetuate routine abuses of power will be further funneling people to ICE in violation of our laws.
- To ensure that our laws from a decade ago evicting ICE from Rikers Island and city jails are not undermined, by prohibiting any federal agency carrying out a deportation agenda from setting up office on DOC property and having unfettered access to immigrant New Yorkers by passing the **Safer Sanctuary Act**. We must likewise ensure that no future mayor, like we saw with our current mayor, abuse their power to seek to roll back the clock on our longstanding protections.

We must pass laws that help mitigate the racism and inequality that plague the criminal legal system by ending the criminalization to deportation pipeline and frustrating efforts to doubly punish people with criminal contacts by pushing them into a deportation system.

Today we call on our Council to act clearly and boldly. We cannot as a city say that this is a welcoming city for immigrant New Yorkers - while colluding with ICE to funnel community members directly into their immigration jails. The time is not now - *it has passed* - for NYC to step up as a leader and send a clear message: our City stands *with* our immigrant communities.

New York City Council Committee on Immigration  
Monday, December 8 at 10AM  
Testimony of Adam Ring, Coordinator, Indivisible Brooklyn

Thank you for holding this hearing on four bills that would promote the safety of New York's immigrant communities. My name is Adam Ring and I'm an organizer with Indivisible Brooklyn. Indivisible Brooklyn is an all-volunteer, grassroots organization formed in 2016 in response to the crisis facing our democracy. Our members come from all over Brooklyn and we take collective action together to promote civic engagement around democracy and civil rights, climate justice, and an inclusive economy.

I am testifying here today because the people of New York are under attack. And we are united in calling upon the Council to reinforce the sanctuary protections that make all of us safer and to provide New Yorkers with ways we can protect ourselves when our rights under existing law are violated.

Over the course of decades and under various administrations, New York City has developed policies that protect New Yorkers from the risk of being detained or deported. Our city's promise to welcome immigrants with dignity makes New York safer for the 3 million immigrants who have made their home here and for every other New Yorker too. Everyone is safer when New Yorkers can pursue a livelihood, an education, and lifesaving healthcare with the confidence that we won't be kidnapped on our way to work, to school, or to the doctor. Everyone is safer when New Yorkers can report a problem and submit testimony with the confidence that our participation in the civic life of this city will not bring us harm because of our immigration status. And everyone is safer when public servants understand that they must follow the law or they will be held accountable for violating it.

That is why Indivisible Brooklyn supports Intro 214, which creates a private right of action so that New Yorkers can enforce our rights under existing law.

That is why Indivisible Brooklyn supports Intro 1412, which adds protections against abuses of mayoral power that would undermine our sanctuary laws, like what we have seen in the past year.

That is why Indivisible Brooklyn supports Intro 1268, which helps New Yorkers understand our rights when interacting with federal immigration authorities as we cross between public and nonpublic spaces while moving around the city.

And that is why Indivisible Brooklyn supports Intro 1272, which prohibits the use of E-Verify for checking the status of job applicants who have not actually been offered a job and without letting prospective employees know that the employer is enrolled in E-Verify.

New Yorkers know that this city belongs to everyone who calls this city home. And we are all safer when our friends and neighbors are able to live here safely too. So we call upon the City Council to take action so we can keep our communities safer by passing these four bills before the end of this Council's term.

Thank you.

Adam Ring  
Coordinator, Indivisible Brooklyn

**From:** [Colson, Brandon](#)  
**To:** [Testimony](#)  
**Subject:** FW: [EXTERNAL] Intro 214+  
**Date:** Monday, December 8, 2025 4:02:05 AM

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**From:** Diane Aronson [REDACTED]  
**Sent:** Sunday, December 7, 2025 10:29 PM  
**To:** Office of Correspondence Services [REDACTED]  
**Subject:** [EXTERNAL] Intro 214+

[REDACTED]

New York City Council Committee on Immigration  
Monday, December 8 at 10AM  
Diane Aronson, coordinator, Indivisible Brooklyn

Thank you for holding the hearing on December 8, 2025 for four bills that would promote the safety of New York's immigrant communities. My name is Diane Aronson and I'm an organizer with Indivisible Brooklyn. Indivisible Brooklyn is an all-volunteer, grassroots organization formed in 2016 in response to the crisis facing our democracy. Our members come from all over Brooklyn and we take collective action together to promote civic engagement around democracy and civil rights, climate justice, and an inclusive economy. Uniting to protect all New Yorkers is a core Indivisible Brooklyn tenet.

I am testifying via email because the people of New York are under attack. And we are united in calling upon the Council to reinforce the sanctuary protections that make all of us safer and to provide New Yorkers with ways we can protect ourselves when our rights under existing law are violated.

Over the course of decades and under various administrations, New York City has developed policies that protect New Yorkers from the risk of being detained or deported. Our city's promise to welcome immigrants with dignity makes New York safer for the 3 million immigrants who have made their home here and for every other New Yorker too.

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New Yorkers know that this city belongs to everyone who calls this city home. And we are all safer when our friends and neighbors are able to live here safely too. So we call upon the City Council to take action so we can keep our communities safer by passing these four bills before the end of this Council's term.

Sincerely,  
Diane Aronson

**Korean Community Services of Metropolitan New York, Inc. (KCS)**

203-05 32nd Avenue, Bayside, NY 11361

Tel: (718) 939-6137 | Email: [immigration@kcsny.org](mailto:immigration@kcsny.org)

Date: December 8, 2025

To: New York City Council, Committee on Immigration

Re: A Local Law to amend the administrative code of the city of New York, in relation to signage describing certain constitutional and legal protections / Int 1268-2025

**Good morning Council Members,**

Thank you, Chair and members of the New York City Council Committee on Immigration for holding this important hearing and for giving me the opportunity to testify.

My name is Joyce Wong, and I'm here on behalf of KCS.

Since 1973, KCS has been a trusted community-based organization serving immigrant New Yorkers—particularly Korean Americans as well as other Asian American and Pacific Islander (AAPI) residents—through programs in health services, social services, workforce development, and legal assistance.

Every day, we work with people who are trying to navigate city systems for the first time, whether it be registering for health benefits, seeking employment opportunities, assistance with legal applications, or simply stopping by a resource center because they don't know where else to go to obtain information on the city's offerings and their rights. Many of them come to us with questions, worries, or simply confusion about how things work, and especially about what their rights are when interacting with government offices.

In 2022, we expanded our work by launching our Immigration and Legal Services Department, which now offers a full range of support— from preparing immigration forms to providing comprehensive legal services in family matters, employment, housing, bankruptcy, wills & trusts, and criminal defense. This past year alone, we supported about 200 in-person cases and handled over 800 phone consultations, and hosted more than 10 community legal education events, including *Know Your Rights* sessions and immigration workshops.

Across Korean, Chinese, and other AAPI communities, we continue to see how fear, misinformation, and language barriers shape people's daily interactions with public systems. Many of our clients are not sure which areas of a city building they are allowed to enter, and others hesitate to visit government or school offices because they are worried about encountering unknown procedures or potential law enforcement— even when they have every

reason to be there. For example, we often meet Korean seniors at our center who avoid and feel imitated visiting city agencies because signage is not available in their language. Additionally, we also hear from Chinese-speaking clients that feel hesitant about visiting a Social Security center because there are no signs in their language to direct them to the right area or to make an appointment before visiting. These small moments may seem minor from the outside, but for many of our community members, this affects whether they feel safe accessing services they are entitled to.

These experiences highlight why accurate, visible, and multilingual information about legal and constitutional rights is so crucial—online, at city offices, in public schools, and any facility where immigrant New Yorkers go for help.

The proposed legislation's focus on developing clear signage that explains legal protections, distinguishes public from private-only areas in city buildings, and is available in designated citywide and temporary languages aligns with what we see in our work.

Plain, simple, and age-appropriate signage that is posted consistently and visibly has the potential to:

- Reduce confusion for people walking into city buildings for services,
- Help families and elders understand what to expect during interactions with city staff
- Ensure immigrant residents know their rights, and
- Strengthen trust in public spaces by reducing fear and misinformation

We also appreciate the bill's emphasis on community outreach and making information accessible in public schools, libraries, online portals, and resource centers throughout the city. These are among the places where our communities already seek support.

**Therefore,** KCS respectfully requests that the City Council:

1. Ensure that signage is accurate, visible, and multilingual including Korean, Chinese, and other languages spoken by AAPI communities in locations where immigrant residents already seek help, such as schools, resource centers, libraries, and IDNYC enrollment sites.
2. Promote stronger collaboration between city agencies and trusted community organizations to ensure translations, wording and design are culturally appropriate for groups such as Korean and Chinese speakers.
3. Promote clear and consistent communication between agencies and community partners so that immigrant New Yorkers receive timely and reliable information about their rights and services available to them.
4. Reinforce that immigrant communities can safely access city services without fear, especially in public places like schools, libraries, city agencies, and nonprofit organizations. Clear signage will support this goal by providing clarity and reassurance to its residents.

KCS remains fully committed to serving our immigrant New Yorkers with dignity and care. We are ready to work closely with the City to make sure our communities can access information, services, and public spaces with confidence and clarity.

We thank the Committee for its continued leadership and for the opportunity to testify today.

**Respectfully submitted,**

Korean Community Services of Metropolitan New York, Inc.

**Korean Community Services of Metropolitan New York, Inc. (KCS)**

203-05 32nd Avenue, Bayside, NY 11361

Tel: (718) 939-6137 | Email: [immigration@kcsny.org](mailto:immigration@kcsny.org)

Date: December 8, 2025

To: New York City Council, Committee on Immigration

Re: A Local Law to amend the administrative code of the city of New York, in relation to signage describing certain constitutional and legal protections / Int 1268-2025

**Good morning Council Members,**

Thank you, Chair and members of the New York City Council Committee on Immigration for holding this important hearing and for giving me the opportunity to testify.

My name is Joyce Wong, and I'm here on behalf of KCS.

Since 1973, KCS has been a trusted community-based organization serving immigrant New Yorkers—particularly Korean Americans as well as other Asian American and Pacific Islander (AAPI) residents—through programs in health services, social services, workforce development, and legal assistance.

Every day, we work with people who are trying to navigate city systems for the first time, whether it be registering for health benefits, seeking employment opportunities, assistance with legal applications, or simply stopping by a resource center because they don't know where else to go to obtain information on the city's offerings and their rights. Many of them come to us with questions, worries, or simply confusion about how things work, and especially about what their rights are when interacting with government offices.

In 2022, we expanded our work by launching our Immigration and Legal Services Department, which now offers a full range of support— from preparing immigration forms to providing comprehensive legal services in family matters, employment, housing, bankruptcy, wills & trusts, and criminal defense. This past year alone, we supported about 200 in-person cases and handled over 800 phone consultations, and hosted more than 10 community legal education events, including *Know Your Rights* sessions and immigration workshops.

Across Korean, Chinese, and other AAPI communities, we continue to see how fear, misinformation, and language barriers shape people's daily interactions with public systems. Many of our clients are not sure which areas of a city building they are allowed to enter, and others hesitate to visit government or school offices because they are worried about encountering unknown procedures or potential law enforcement— even when they have every

reason to be there. For example, we often meet Korean seniors at our center who avoid and feel imitated visiting city agencies because signage is not available in their language. Additionally, we also hear from Chinese-speaking clients that feel hesitant about visiting a Social Security center because there are no signs in their language to direct them to the right area or to make an appointment before visiting. These small moments may seem minor from the outside, but for many of our community members, this affects whether they feel safe accessing services they are entitled to.

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The proposed legislation's focus on developing clear signage that explains legal protections, distinguishes public from private-only areas in city buildings, and is available in designated citywide and temporary languages aligns with what we see in our work.

Plain, simple, and age-appropriate signage that is posted consistently and visibly has the potential to:

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We also appreciate the bill's emphasis on community outreach and making information accessible in public schools, libraries, online portals, and resource centers throughout the city. These are among the places where our communities already seek support.

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KCS remains fully committed to serving our immigrant New Yorkers with dignity and care. We are ready to work closely with the City to make sure our communities can access information, services, and public spaces with confidence and clarity.

We thank the Committee for its continued leadership and for the opportunity to testify today.

**Respectfully submitted,**

Korean Community Services of Metropolitan New York, Inc.



84 W 197th Street  
Bronx NY 10468

## New York City Council Committee on Immigration

December 8, 2025

### Testimony of Mekong NYC

Thank you to the New York City Council Committee on Immigration for holding this public hearing and providing the opportunity to share our testimony today. My name is Socheatta Meng, and I am the Executive Director for Mekong NYC.

Mekong NYC is a social justice organization dedicated to organizing and uplifting the Southeast Asian community in the Bronx and across New York City. Through community organizing and movement building; fostering healing via arts and culture; and providing a robust social safety net, we aim to build community power. We are proud to be the *only* community-based organization providing Southeast Asian deportation defense in New York. And today, more than ever, that work is urgent.

Nearly 50 years ago, the U.S. government brought over 1.2 million people from Cambodia, Laos, and Vietnam to this country, making this the largest refugee resettlement program in American history. Here in New York City, tens of thousands of our community members were resettled in the Bronx and Brooklyn after surviving unimaginable trauma — the Vietnam war, the Khmer Rouge genocide, and relentless carpet-bombing, all fueled by the U.S. military.

The U.S. promised our families safety, healing, and a new start. Instead, they faced systemic poverty, over-policing, underfunded schools, a lack of living-wage jobs, and high rates of untreated mental-health needs. These conditions – combined with the over-policing of communities of color and the 1996 immigration laws – set the stage for **17,000 Southeast Asian refugees and immigrants to remain deportable today**, decades after they arrived as refugee babies and children.

The Southeast Asian community has long been invisible in this country and in New York City. And in the landscape of detention and deportation, we remain overlooked and hidden in the margins. For the past 20 years, our community has experienced a deportation crisis. Southeast Asians are **three to five times more likely to be deported** due to prior convictions — even when community members have already served their time. Deportation becomes a

second punishment, sending people back to countries they escaped as young children, and in many cases, have no connection to.

Under the second Trump administration, this crisis has escalated in unprecedented ways, even as the media fails to report it. During this past year, hundreds of Southeast Asian people have been quietly rounded up, placed on charter flights, and separated from their families and communities.

- In May during the Memorial Day weekend, **160 people were deported to Laos and Vietnam.**
- In August, another **100 people were sent to Laos and Vietnam.**
- In September during the Labor Day weekend, **59 people were deported to Cambodia and Laos.**
- In October, **140 people were sent to Laos and Vietnam.**
- On November 5th, **160 people were deported yet again to Laos and Vietnam.**

ICE has even deported our people to **third countries**, including Panama, Libya, South Sudan, and Eswatini – sending people to places they have never known.

And within detention centers, our community members are dying.

Mr. **Nhon Ngoc Nguyen**, age 55, died in April in El Paso, Texas.

Mr. **Tien Xuan Phan**, also 55, died in July in Karnes County, Texas.

These are not isolated incidents. They are the consequence of a system designed to dehumanize, disappear, and discard.

At Mekong NYC, as we fight everyday to provide know your rights information, emergency planning support, ICE accompaniments, case management support, and referrals to legal partners – we have seen requests for support quadruple in the past year.

Deportation doesn't just separate families — it pushes entire communities further into the shadows. It cuts people off from schools, hospitals, housing courts, social services, and the basic institutions they rely on for survival. It worsens economic instability, threatens housing, harms children's education, and triggers deep intergenerational trauma rooted in war and displacement.

Today, families in our community are afraid to drop their kids off at school. They're afraid to buy groceries, go to the park, or move freely in their own neighborhoods. Many are living in hiding.

This is displacement happening all over again. Fifty years ago, the United States brought our families here after devastating our homelands. Today, the United States is sending our people back, forcing them to hide once again — no longer from bombs, but from ICE.

## **TESTIMONY**

The New York City Council  
Committee on Immigration

Re: Calling for the Passage of the NYC Trust Act  
and Additional Measures to Protect New Yorkers

NAACP Legal Defense  
& Educational Fund, Inc.  
40 Rector Street, 5<sup>th</sup> Floor  
New York, NY 10006

December 11, 2025

Dear Chair Avilés and Members of the Committee on Immigration:

On behalf of the Legal Defense Fund (LDF), we thank you for this opportunity to provide testimony regarding Int. 214, the NYC Trust Act. This bill would provide New Yorkers with a much-needed remedy if they or their loved ones are negatively impacted by city officials' failure to comply with local laws limiting their cooperation with federal immigration authorities. **We urge this committee, and the full City Council, to advance the rights of immigrant New Yorkers by passing the NYC Trust Act.**

LDF is the nation's first and foremost civil rights and human rights law organization. Since its founding over eighty years ago, LDF has worked at the national, state, and local levels to pursue racial justice and eliminate structural barriers for the Black people in the areas of criminal justice, economic justice, education, and political participation.<sup>1</sup> As part of that work, LDF has forged longstanding partnerships within New York City to challenge and reform unlawful and discriminatory law enforcement practices. In 2010, LDF joined with co-counsel The Legal Aid Society and pro bono counsel to file *Davis, et al. v. City of New York, et al.*, challenging the New York City Police Department's (NYPD) policy and practice of stopping and arresting New York City Housing Authority (NYCHA) residents and visitors for trespass without the requisite level of suspicion and in a discriminatory manner.<sup>2</sup> In 2015, the *Davis* plaintiffs reached a settlement with the City that included full participation in the ongoing federal court monitoring of the NYPD, ordered in *Floyd, et al. v. City of New York*.

LDF has also fought to protect the rights and dignity of Black immigrants. For example, in 2018, LDF filed a lawsuit on behalf of the National Association for the Advancement of Colored People (NAACP) against the Department of Homeland Security, arguing that the Trump Administration's rescission of Temporary Protected Status for Haitian nationals denied them their right to due process and equal protection under the Fifth Amendment.<sup>3</sup>

Our work on behalf of Black people in both the policing and immigration arenas leads us to conclude that the NYC Trust Act is a critical tool for upholding the rights of non-citizen New Yorkers and ensuring that local institutions minimize their complicity in harmful immigration enforcement activities.

Under the current administration, federal authorities have increased their use of aggressive and abusive enforcement actions against immigrant New Yorkers and noncitizens around the country. U.S. Immigration and Customs Enforcement (ICE) agents have been tearing families apart in the hallways of courthouses when they report to court to dutifully comply with the

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<sup>1</sup> *About Us*, Legal Def. Fund, <https://www.naacpldf.org/about-us/> (last visited Nov. 20, 2025).

<sup>2</sup> *Davis v. City of New York*, Legal Def. Fund, <https://www.naacpldf.org/case-issue/davis-v-city-new-york/> (last visited Nov. 20, 2025).

<sup>3</sup> NAACP Legal Defense & Educational Fund, Inc., *LDF Issues Statement on the Restoration of Haiti's Temporary Protected Status*, NAACP LDF (May 22, 2021), <https://www.naacpldf.org/press-release/ldf-issues-statement-on-the-extension-of-haitis-temporary-protected-status/>.

requirements of their immigration proceedings.<sup>4</sup> In October, masked officers descended on Canal Street with an armored vehicle and assault rifles to arrest Black and Brown street vendors.<sup>5</sup> In November, New York City Police Department (NYPD) officers responded to reports of armed men pulling people out of cars in Washington Heights, only to find that those armed men were, in fact, plainclothes federal immigration agents.<sup>6</sup>

It is imperative that city officials take every precaution available to protect residents and visitors alike from aggressive and inhumane treatment. While the City is limited in its ability to regulate federal authorities, it is able to limit the collaboration of city agencies and federal authorities to the level required by law and no more. Indeed, New York City has committed to protecting immigrants by ensuring that local agencies do not comply with many requests issued by federal immigration authorities to hold individuals suspected of violating immigration laws. These requests, known as “detainers,” are intended to ensure a person can easily be transferred to federal immigration custody for the purpose of arrest or deportation. In New York City, local agencies are not permitted to comply with detainers unless the federal authority presents a judicial warrant and (1) the individual being held has been convicted of a “violent or serious crime” or (2) is identified as a “possible match” on a U.S. terrorist watch list.<sup>7</sup> These exceptions likely already facilitate too much information-sharing between local and federal authorities, given the wide breadth of what is considered a “violent or serious crime”<sup>8</sup> and legitimate concerns about the reliability and accuracy of U.S. terrorism watch lists.<sup>9</sup>

Unfortunately, even with these exceptions, City agencies have not always complied with these rules. For example, in 2023, a New York City Department of Corrections (DOC) official admitted at a City Council hearing that email communications between DOC and ICE were at odds

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<sup>4</sup> Julia Ingram, *ICE Agents Target New York City Immigration Courts More Often Than Others, New Analysis Suggests*, CBS News (Oct. 8, 2025), <https://www.cbsnews.com/news/ice-agents-new-york-city-immigration-courts-analysis/>.

<sup>5</sup> Luis Ferré-Sadurní & Olivia Bensimon, *ICE Raid Hits Canal Street in Chinatown as Tension Mounts*, N.Y. Times (Oct. 21, 2025), <https://www.nytimes.com/2025/10/21/nyregion/nyc-raid-canal-st-agents-ice.html>.

<sup>6</sup> Charles Lane, *NYPD Says 2 Officers Injured During Washington Heights ICE Chase*, Gothamist (Nov. 12, 2025), <https://gothamist.com/news/nypd-says-2-officers-injured-during-washington-heights-immigration-action>.

<sup>7</sup> N.Y.C. Admin. Code § 9-131 (McKinney); N.Y.C. Admin. Code § 14-154 (McKinney).

<sup>8</sup> There are 155 statutes cited as “violent or serious” crimes in N.Y.C. Admin. Codes § 9-131 and § 14-154. The list includes NY Penal Law 215.51 (Criminal Contempt in the First Degree), for which a person can be convicted if they refuse to be sworn in as a witness at a Grand Jury. *People v Di Maria*, 481 N.Y.S.2d 244 (N.Y. Sup. Ct. 1984). Given the federal administration’s targeting of courthouses for immigration enforcement, it may be improper to classify a non-citizen’s refusal to participate in court proceedings as “violent or serious.” Further, a conviction for this law can be sustained even if the defendant was acting pursuant to an attorney’s direction. *People v. Lee*, 526 N.Y.S.2d 1011 (N.Y. App. Div. 2d Dep’t 1988).

<sup>9</sup> Jeremy Scahill & Ryan Devereaux, *Watch Commander: Barack Obama’s Secret Terrorist-Tracking System*, by the Numbers, *The Intercept* (Aug. 5, 2014), <https://theintercept.com/2014/08/05/watch-commander/>; Rachel Levinson-Waldman & José Guillermo Gutiérrez, *Overdue Scrutiny for Watch Listing and Risk Prediction: Reining In Civil Liberties Abuses and Assessing Efficacy*, Brennan Ctr. for Justice, (Oct. 19, 2023), <https://www.brennancenter.org/media/11828/download/BCJ-152%20Risk%20Assessment.pdf>; Rachel Levinson-Waldman & José Guillermo Gutiérrez, *Oversight Board’s Terrorist Watchlist Report Underscores Need for Major Overhaul*, Brennan Ctr. for Justice, (Feb. 21, 2025), <https://www.brennancenter.org/our-work/analysis-opinion/oversight-boards-terrorist-watchlist-report-underscores-need-major>

with DOC policy restricting cooperation.<sup>10</sup> One email reflected cooperation between DOC and ICE about a person that should not have been subject to a detainer.<sup>11</sup> In cases such as these, when the DOC may violate local laws that prohibit City agencies from coordinating with ICE, there is currently no recourse for individuals who are harmed by violations.<sup>12</sup> As a result, immigrants and their families have few, if any, avenues for accountability when they or their loved ones are illegally transferred from a city agency into federal custody.

The NYC Trust Act would correct this significant problem by amending City law to ensure people have a private right of action to sue the City for violating its obligations to protect them from unauthorized detainers. Particularly in the current climate of repressive and aggressive federal immigration enforcement, the City Council has a duty to ensure that local institutions are protecting New Yorkers rather than enabling the federal government's abuses. The NYC Trust Act would serve this goal by creating a tangible monetary incentive for the city to ensure that its agencies adhere to local law. Further, it would ensure that New Yorkers' rights under the city's "sanctuary" policies are actionable, and not merely nominal.

Accordingly, we call on the City Council to pass this important bill immediately.

Respectfully submitted,

David Moss  
JPP Counsel, Justice in Public Safety Project  
NAACP Legal Defense and  
Educational Fund, Inc.

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<sup>10</sup> Arya Sundaram & Matt Katz, *'#teamsendthemback': Emails Reveal Cozy Relationship, Cooperation Between NYC Correction Officers and ICE*, Gothamist (Feb. 15, 2023), <https://gothamist.com/news/teamsendthemback-private-emails-reveal-cozy-relationship-cooperation-between-nyc-correction-officers-and-ice>.

<sup>11</sup> *Id.*

<sup>12</sup> N.Y.C. Admin. Code § 9-131 (McKinney); N.Y.C. Admin. Code § 14-154 (McKinney).



**TESTIMONY OF THE NEIGHBORHOOD DEFENDER SERVICE**

**before the**

**Committees on Immigration**

**IN RELATION TO**

**December 8, 2025 Committee Hearing**

Over 30 years ago, Neighborhood Defender Service of Harlem (“NDS”) pioneered holistic defense, and has since served the Harlem community in criminal, family, civil and immigration matters. Our immigration team has zealously advocated for immigrant community members through often novel and groundbreaking representation since our inception.

Given our expertise, we specifically share the following regarding the NYC Trust Act and the Safer Sanctuary Act and urge the Council to swiftly pass all four bills presented at the

hearing. As the federal government engages in aggressive enforcement tactics, there is an even greater need to act now to protect our immigrant communities. Despite the city council's strong support of immigrant communities over the years, members of our local government continue to undermine these efforts. Most recently, our own Mayor attempted to allow ICE back onto Rikers, efforts thwarted by this Council and joint advocacy efforts. NDS wholeheartedly supports the four bills presented at the council hearing on December 8<sup>th</sup> to keep our immigrant communities safe.

Three years ago, after a routine appearance in criminal court, a client of NDS who had lived in New York City for nearly three decades was handed over to ICE agents, despite the fact that he had no felony record and none of the triggers for compliance with our city's detainer law. Without knowing what was happening, he was put in a van and driven across state lines to what he would later learn was an immigration prison, where he was told by other inmates, "we are going to be deported." He felt like he had just been kidnapped. Within days he began suffering from medical conditions that were not properly treated by ICE staff, causing him to lose 50 pounds of weight before they finally took him to a hospital. He was terrified of the possibility of being deported to Ukraine, a country from which he and his family had fled from persecution decades earlier, and which was now an active warzone. After filing applications, motions, appeals, bond requests, and habeas litigation, NDS was finally able to free him, but only after he had spent 18 months of his life in detention. While he was able to reunify with his family, there was no recourse for the harm done.

At the February 2023 immigration committee hearing, it was revealed that this client's experience was not unique—NYPD and DOC routinely violated sanctuary laws. Officials and officers not only disregarded our laws, they often did so while expressing offensive, anti-immigrant sentiments, underscoring that these violations were intentional. Today, just like in 2023, we know that NYPD and DOC continues to cooperate with ICE despite indicating otherwise. This cooperation is not just isolated incidents. There is a pervasive culture within the DOC and NYPD that actively supports this deportation scheme, and this culture continues to deprive immigrant New Yorkers of their constitutional rights. As Brittany Brown of the New York County Defender Services testified, their client was just recently released from DOC custody to ICE without a judicial warrant in clear violation of sanctuary laws.

We cannot have repeats of these scenarios only to learn about violations months or sometimes years later when the harm cannot be undone. Existing sanctuary protections must be bolstered by closing the loophole allowing ICE back onto Rikers and creating accountability through a private right of action for violations of the New York City Detainer

Law. The private right of action is critical to ensure that our sanctuary protections are real rather than abstract.

These laws also address the chilling fear that these federal enforcement tactics have had on our fellow immigrant New Yorkers. The perception that police, city service providers, or other municipal employees are working with ICE discourages people with uncertain status or those with immigrant family members from reaching out in an emergency, participating in investigations, or engaging with court process—a reality that has ripple effects throughout our system of government and society. Families have expressed fear of visiting their relatives at Rikers. Parents fear sending their children to school. Defendants give up legal claims and witnesses refuse to testify out of fear of going to government buildings. Many immigrant New Yorkers are forgoing benefits such as shelter, medical care, and other housing opportunities. Parents who risk losing their children to the foster system often rely on their families for support as kinship guardians. It has become increasingly difficult to convince family members to step up to serve as guardians due to deep concerns that ACS and preventive agencies are colluding with ICE. While city agencies are presumably designed to provide critical and lifesaving services, there is widespread fear of reaching out to these agencies. Parents are forced to choose between accessing basic needs for themselves and their children versus the risk of separation from their families. And with reports of racial profiling leading to violent arrests against even U.S. citizens across the United States, these chilling effects have spread to immigrants with legal status and U.S. citizens with immigrant family members.

Strengthening our sanctuary protections by passing the proposed laws honors NYC's commitment to our immigrant communities to keep individuals and families safe. While the harm to those who have suffered at the hands of our unjust mass deportations system cannot be undue, there must be accountability and stronger laws to prevent future harm. Immigrant New Yorkers are at the core of the fabric of New York City—and this city owes them this commitment.



Legislative Affairs  
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**Testimony of the New York Civil Liberties Union  
to  
The New York City Council Committee on Immigration  
Regarding the  
New York City Trust Act and Safer Sanctuary Act**

**December 8, 2025**

The New York Civil Liberties Union (NYCLU) respectfully submits the following testimony with regard to the New York City Council Committee on Immigration hearing concerning the New York City Trust Act, the Safer Sanctuary Act, and other legislation protecting the rights of immigrant New Yorkers.

**I. Introduction.**

The NYCLU advances civil rights and civil liberties so that all New Yorkers can live with dignity, liberty, justice, and equality. Founded in 1951 as the state affiliate of the national ACLU, we marshal an expert mix of litigation, policy advocacy, field organizing, and strategic communications. Informed by the insights of our communities and coalitions and powered by 90,000 member-donors, we work across complex issues to create more justice and liberty for more people.

Today's hearing comes at a time of tremendous fear and uncertainty among immigrant communities, but also at a moment of hope for our city. Less than one year into a second Trump administration, U.S. Immigration and Customs Enforcement (ICE) and other federal agencies have targeted immigrants for arrest and deportation in a manner that is without historical precedent. Just in the past several months in New York City, we have seen ICE entrap people at immigration

court hearings and check-ins,<sup>1</sup> ruthlessly target vendors on Canal Street,<sup>2</sup> and separate and detain a Queens man and his 6-year-old son.<sup>3</sup> The dread that noncitizen New Yorkers feel is palpable. Many immigrants across the five boroughs remain huddled inside their homes, afraid that merely setting foot outside could expose them to indiscriminate ICE arrest.

At the same moment that ICE is terrorizing immigrant New Yorkers, the city is about to turn the page on one of the more shameful chapters in its history. New York is a city that was built by immigrants. It has a long tradition as a sanctuary city that refuses to aid immigration enforcement, embodied in laws and policies with bipartisan support that date in some form to the administration of Mayor Ed Koch in the 1980s. Today those protections are codified into local laws that broadly prohibit the use of city resources for immigration enforcement and restrict the ability of the New York Police Department (NYPD) and Department of Correction (DOC) from honoring civil immigration detainees.<sup>4</sup> For many years, New York City's sanctuary laws were a matter of consensus among city leaders, who recognized the importance of establishing trust between city agencies and the people they served regardless of their immigration status.

Yet outgoing Mayor Eric Adams sought to abandon these decades-old commitments, attempting to flout and undermine our well-established sanctuary laws in service of a backdoor deal to avoid personal legal troubles.<sup>5</sup> Mayor Adams repeatedly and publicly cozied up with Trump administration officials and openly vowed to increase collaboration with ICE.<sup>6</sup> While the mayor's more flagrant efforts to skirt prohibitions on working with ICE were thankfully thwarted, the

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<sup>1</sup> Ben Fractenberg and Gwynne Hogan, Five Months of Fear, Fury and Heartbreak at 26 Federal Plaza, *The City* (Nov. 3, 2025), <https://www.thecity.nyc/2025/11/03/5-months-immigrants-ice-26-federal-plaza-photos/>.

<sup>2</sup> Ana Ley and Olivia Bensimon, *Fear and Anger Fill New York's Canal Street After Immigration Raid*, *N.Y. Times* (Oct. 23, 2025), <https://www.nytimes.com/2025/10/23/nyregion/nyc-canal-street-fear-anger.html>.

<sup>3</sup> Gwynne Hogan, ICE Arrested and Separated Chinese Father From 6-Year-Old Son, *Advocates Say*, *The City* (Dec. 2, 2025), <https://www.thecity.nyc/2025/12/02/ice-arrested-separated-chinese-father-6-year-old-son/>.

<sup>4</sup> NYC Admin. Code § 10-178; NYC Admin. Code § 9-131; NYC Admin. Code § 14-154.

<sup>5</sup> George Joseph, *I'm collaborating': how New York City's mayor gave in to Trump's migrant crackdown*, *The Guardian* (Feb. 21, 2025), <https://www.theguardian.com/us-news/ng-interactive/2025/feb/21/eric-adams-trump-immigrants-rikers>.

<sup>6</sup> Eric Levenson, Gloria Pazmino and Tierney Sneed, NYC mayor preps executive order allowing ICE agents into Rikers Island after meeting with border czar, *CNN* (Feb. 14, 2025), <https://www.cnn.com/2025/02/13/us/nyc-adams-border-czar-immigration>.

unmistakable message of this flirtation with ICE created a climate of fear and severely damaged the sense of trust these policies were meant to establish.

The city will soon have an opportunity to change course. With a new mayoral administration set to take office in less than one month, there is reason to hope that New York City can truly live up to its promise to be a welcoming city for immigrants. It is therefore incumbent on the City Council to set the stage for this new era by ensuring that our local laws are strong, unambiguous, and contain meaningful mechanisms for accountability. With the legislation before the committee today, the Council can take a major step towards restoring trust between the city and immigrant communities.

## **II. The Council must pass the New York City Trust Act to give our sanctuary laws teeth.**

When properly complied with, New York City's sanctuary laws provide a level of assurance for immigrant New Yorkers, and can mitigate the harms of aggressive ICE enforcement. However, there is ample evidence that the city's laws are regularly violated by those tasked with implementing them. Last week, the Department of Investigation (DOI) released a report on the NYPD's compliance with local sanctuary laws, following an investigation requested by Council Speaker Adrienne Adams.<sup>7</sup> The report documented at least one instance in which the NYPD clearly violated local law and policy in the context of a task force arrangement involving ICE's Homeland Security Investigations (HSI) unit, along with other instances in which officers failed to fully follow department protocol or failed to consider the downstream immigration consequences of working with federal authorities on criminal matters.<sup>8</sup> The report also found that the NYPD was failing to comply with its recordkeeping and reporting requirements,<sup>9</sup> making it difficult to know how much collusion may or may not be happening. The report further revealed that the NYPD is woefully deficient in training officers, with less than half of the force having met a requirement that they certify they had read and understood the NYPD's controlling policy document on responding to requests for immigration enforcement.<sup>10</sup>

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<sup>7</sup> NYC Department of Investigation, *DOI Investigation into the NYPD's Compliance with Local Laws Restricting City Assistance with Immigration Enforcement*, Dec. 3, 2025, available at <https://www.nyc.gov/assets/doi/reports/pdf/2025/49NYPD.SancLawsRelease.Rpt.12.03.2025.pdf>.

<sup>8</sup> *Id.* at p. 19-32.

<sup>9</sup> *Id.* at p. 33-36.

<sup>10</sup> *Id.* at 17.

The NYPD is not the only city agency that has been discovered to be out of compliance with local sanctuary laws. Earlier this year, a separate DOI report found that an investigator with the DOC violated city sanctuary laws by providing ICE HSI with information about a person's custodial status, resulting in his arrest.<sup>11</sup> As explored previously by this committee in 2023, public records obtained by advocates showed clear instances of DOC employees gleefully communicating with ICE by e-mail about people in custody in violation of the city's detainer law.<sup>12</sup> Several years ago, the DOC admitted that it wrongfully turned a Bronx man over to ICE custody in violation of the detainer laws.<sup>13</sup>

These are just some of the examples that we know of. It is impossible to know what other, less formal types of collusion might be happening that go undetected. Yet when violations do occur, there is no clear avenue under city law for those harmed to seek recourse. In order for our sanctuary laws to have force, there must be a meaningful mechanism for accountability in place when those laws are not followed.

The Council must pass the New York City Trust Act (Intro. 214-2024), which would create a private right of action for those harmed by sanctuary violations to sue in court for damages. This legislation would not only allow people wrongfully detained as a result of unlawful collusion to seek compensation, but more importantly, it would serve as a powerful deterrent for those agencies at the forefront of implementing our sanctuary laws to make sure that violations don't occur in the first place.

### **III. The Council must pass the Safer Sanctuary Act to ensure that ICE is never allowed to return to Rikers Island.**

When the city's detainer laws were strengthened in 2014, a key achievement of the updated law was a provision that prohibited federal immigration authorities from maintaining an office on DOC property.<sup>14</sup> Prior to these amendments, ICE had

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<sup>11</sup> NYC Department of Investigation, *DOI Investigation into DOC Correction Intelligence Bureau Investigator Assisting Federal Agents with Immigration Enforcement*, Sep. 25, 2025, available at <https://www.nyc.gov/assets/doi/reports/pdf/2025/38DOC.Release.Rpt.09.25.2025.pdf>.

<sup>12</sup> Arya Sundaram and Matt Katz, *Emails reveal coy relationship, cooperation between NYC correction officers and ICE*, Gothamist (Feb. 16, 2023), <https://gothamist.com/news/teamsendthemback-private-emails-reveal-cozy-relationship-cooperation-between-nyc-correction-officers-and-ice>.

<sup>13</sup> Annie Correal and Ed Shanahan, *He Was Caught Jaywalking. He Was Almost Deported For It.*, N.Y. Times (Mar. 11, 2021), <https://www.nytimes.com/2021/03/11/nyregion/daca-ice-nyc-immigration.html>.

<sup>14</sup> NYC Admin. Code § 9-131(h)(2).

maintained a trailer on Rikers Island to easily facilitate transfers of detained people into its custody. The Council's intent in enacting this provision was clear, and Rikers has remained free of ICE facilities for more than a decade.

Earlier this year, as part of his unseemly bargain with the Trump administration, Mayor Adams attempted to exploit perceived loopholes in the law by issuing an executive order aimed at restoring ICE's presence on Rikers.<sup>15</sup> Fortunately, the maneuver was swiftly struck down in state court.<sup>16</sup> But the Adams administration's efforts shined light on ambiguities in the law and the need to clarify the statutory language.

The Safer Sanctuary Act (Intro. 1412-2025) would eliminate any doubts about the intent of the detainer law by clearly prohibiting federal immigration authorities from maintaining quarters on DOC property for any reason. The bill would further modify the definitions of immigration authorities and immigration enforcement to reflect how the Trump administration is weaponizing various arms of federal law enforcement to carry out its deportation agenda, and collapsing distinctions between civil immigration enforcement and criminal law enforcement. These updated definitions are especially critical in light of the DOI's recent report investigating the NYPD, which found multiple examples where the NYPD's assistance with purported criminal enforcement operations aided civil immigration enforcement efforts.<sup>17</sup>

#### **IV. The Council should ensure that New Yorkers know their rights under city law by requiring clear signage.**

New York City's sanctuary laws have evolved over time, and many New Yorkers understandably do not know the full scope of the protections they provide. Similarly, the tens of thousands of city employees who may interact in some way with local sanctuary laws in the course of their work may be unaware of certain details related to implementation (i.e., what areas of city property are considered non-public) even if they have been trained on the laws.

Intro. 1268-2025 would help ensure that both the public and front-line city employees are better informed about our local sanctuary laws by requiring signage

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<sup>15</sup> Reuven Bleu and Gwynne Hogan, *Adams Administration Inks Executive Order Allowing ICE Back on Rikers Island*, The City (April 9, 2025), <https://www.thecity.nyc/2025/04/09/rikers-island-ice-executive-order/>.

<sup>16</sup> Luis Ferre-Sadurni, *Adams Administration Move to Let ICE Into Rikers Is Illegal, Judge Rules*, N.Y. Times (Sep. 8, 2025), <https://www.nytimes.com/2025/09/08/nyregion/judge-adams-ice-rikers.html>.

<sup>17</sup> Supra note 7.

in multiple languages that spells out the legal protections provided under local law, and requiring city agencies to identify examples of non-public areas of city property that non-local law enforcement are restricted from accessing.<sup>18</sup> The NYCLU urges the Council to act on this legislation.

## **V. Conclusion.**

The Trump administration's cruel immigration enforcement tactics are terrorizing New York City's immigrant communities, and outgoing Mayor Adams's embrace of the Trump agenda has left a scar on our city. In this moment of transition, the City Council has an opportunity to show leadership and bolster our city's longstanding sanctuary laws. We urge the Council to act without delay on the New York City Trust Act, the Safer Sanctuary Act, and other legislation on today's agenda.

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<sup>18</sup> NYC Admin. Code 4-210.



**ORAL TESTIMONY OF THE CORRECTIONS AND COMMUNITY RE-ENTRY  
COMMITTEE**

**HEARING BEFORE THE NEW YORK CITY COUNCIL  
COMMITTEE ON IMMIGRATION**

**SUPPORT FOR INT. 1412-2025**

**DECEMBER 8, 2025**

My name is Karen Adelman and I am the co-chair of the New York City Bar Association's Corrections and Community Re-Entry Committee. Our Committee has been deeply focused on the crisis at Rikers Island. We sponsored a CLE on the state of the *Nuñez* matter and submitted an amicus brief regarding the receivership. Rikers Island remains a human rights catastrophe and closing the jail on time in accordance with the law should be a top priority of this Council and the incoming administration over the next two years.

Intro 1412, of course, will not solve the problems on Rikers Island. But it will stop one very specific problem from getting worse. As everyone here knows, since the new federal administration took power, it has vastly expanded immigration enforcement, not only through the warrantless street stops we have all seen on the news, but also by expanding the use of so-called "mandatory detention" in immigration facilities that are just as crowded, dirty, and unsafe as the jails. And a key component of the federal government's agenda is to use local law enforcement and local jails as so-called "force multipliers" of its manpower.

Prohibiting ICE from maintaining an office on Rikers Island will slow the federal government's inhumane mass deportation efforts. The Department of Correction's ("DOC") unfortunate history of cooperation with ICE has already impacted your constituents. Just last year, the City agreed to a \$92.5 million settlement for individuals held by DOC unlawfully on ICE detainers. The City Bar also supports updating the definition of "immigration officer" to close any loopholes the administration may try to use to station officers in the jails. And we appreciate that the law would supersede any mayoral executive order. We applaud the Council's successful litigation earlier this year against Mayor Adams's unlawful order.

**About the Association**

*The mission of the New York City Bar Association, which was founded in 1870 and has over 20,000 members, is to equip and mobilize a diverse legal profession to practice with excellence, promote reform of the law, and uphold the rule of law and access to justice in support of a fair society and the public interest in our community, our nation, and throughout the world.*

The individuals held at Rikers are already facing serious danger. They do not need to live in further fear that on-site immigration officers will separate them from their communities once they are released. The City Bar supports the necessary protections Intro 1412 will provide. Thank you.

Corrections and Community Re-Entry Committee  
Karen Adelman, Co-Chair  
Andrew C. Case

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Testimony of

Brittany Brown  
Supervisor, Collateral Consequences Unit  
New York County Defender Services

Before the

City Council Committee on Immigration

Hearing on Intro 1412-2025 (Caban) and Intro 214-2025 (Hanif)

December 8, 2025

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities in New York City. My name is Brittany Brown and I am the Supervising Attorney of the Collateral Consequences Unit at New York County Defender Services (NYCDS). NYCDS is an indigent defense office that every year represents tens of thousands of New Yorkers in Manhattan's Criminal, Family, and Supreme Courts. Our organization includes attorneys who specialize in immigration matters, and advise our clients on any immigration consequences stemming from criminal legal system-involvement, including deportation. They also assist our non-citizen clients with other immigration issues, such as representing them in immigration court and accompanying them to ICE check-ins. Consequently, we frequently represent clients who may have collateral immigration consequences due to their interaction with the criminal legal system.

We, therefore, thank you Chair Avilés for holding today's hearing and to all of the Council Members who have sponsored the bills on today's agenda that seek to bring more accountability to our city's law enforcement operations.

I. Background:

In the last year, the Trump administration has dramatically escalated efforts to target members of our immigrant communities through aggressive federal enforcement tactics. We have also witnessed a mayoral administration attempt to undermine our city's longstanding, and hard-fought protections for immigrant New Yorkers to serve his own interests. New York City's

sanctuary laws are essential to maintaining faith in our city's court systems among community members. Since New York City became a sanctuary city in 1989, mayors of all types of political ideologies have upheld and defended this status, because it unequivocally works. As our city government enters another period of transition, with an upcoming new mayor, it is imperative that the City Council acts swiftly to ensure that our city's commitment to welcoming and protecting immigrants is ironclad. Our local laws must provide clear, unambiguous prohibitions against colluding with immigration authorities, and must also include real disincentives for violating those laws.

Public defenders serve immigrant communities in New York City. For many of our clients, the criminal legal system and the immigration system intersect directly, often with negative consequences. Notably, even arrests for minor offenses can trigger ICE enforcement, thereby putting our clients at risk of detention and removal. Public defenders routinely advise clients on the collateral consequences of their criminal charges, and help them navigate the legal process. We often see firsthand the fear and instability created by these situations for many New Yorkers. Including how ICE involvement may discourage immigrant New Yorkers from appearing in court, reporting crimes, or seeking assistance from city agencies. This mistrust, which is only heightened by City agencies colluding with ICE, can lead to broader negative consequences such as immigrants not accessing public services that they are eligible for.

Even a single arrest, regardless of whether it was later dismissed, can lead to deportation, and erode trust in our legal system. Strengthening protections against unnecessary cooperation with ICE is therefore integral to preserving due process, ensuring courtroom participation, and protecting the safety of our clients and their families.

## II. Proposed Legislation:

- A. [Int. 0214-2025 \(Hanif\)](#) (NYC Trust Act): In relation to creating a private right of action relating to civil immigration detainers and cooperation with federal immigration authorities.

**NYCDS supports this legislation.** This bill would amend the existing city sanctuary laws regarding civil-immigration-detainer procedures, which provide important protections and assurances for noncitizen New Yorkers, as to create a private right of action. Under the proposed legislation, when an individual's rights are violated due to local cooperation with federal immigration authorities, they could sue the City for damages. Meaning when agencies unlawfully honor federal detainers or share information with immigration authorities, individuals will have legal recourse. This private right of action is critical because city agencies like New York Police Department (NYPD) and Department of Corrections (DOC) have violated these laws in recent years, resulting in grave harm to immigrants.

The proposed legislation would not be addressing a theoretical harm. We know these violations are occurring. In February of 2023, this committee held an oversight hearing that revealed that DOC had been overtly colluding with ICE to transfer immigrants from DOC custody to ICE custody, in violation of our laws. Communications obtained through a public records request unequivocally showed clear violations and extreme anti-immigrant sentiments within DOC as email communications to ICE from DOC used the hashtag #teamsendthemback. But DOC is not the only agency colluding with ICE. Earlier this year, a report by the New York City Department of Investigations (DOI) found that a DOI investigator shared sensitive information with ICE that led to the arrests of two immigrants in violation of city law. Even the Administration of Children Services (ACS) has had documented instances of sharing information with ICE in violation of our laws, leading to immigrant detention. These examples demonstrate how multiple city agencies have violated our city's laws and left immigrants with no legal means to address the harms perpetuated against them.

On December 1, 2025, one week ago, our client was released from DOC custody to ICE custody in clear violation of our city's detainer laws. When we asked DOC Legal about this, they told us that they are legally able to communicate with ICE and that it's safer for ICE to take custody of our client rather than make an arrest on the street. There was no judicial warrant for our client. DOC clearly violated city law by handing our client to ICE. When pressed further as to their communication with ICE and any documentation, they told us to submit a FOIL, which we will be doing. This was a flagrant violation of the city's detainer laws and showing how critical this proposed legislation is. Without it, our client has no recourse.

This is not a standalone instance. Previously, one of our clients with an immigration detainer had to wait roughly 24 hours to be discharged from DOC custody. This type of delay is abnormal and led us to believe that DOC may have been in communication with ICE about our client's status, as there was no other reason for such a prolonged delay. Our client was eventually released, but it is unclear if DOC communicated with ICE.

The lack of transparency from DOC is not new. They frequently act in an obstructionist manner. Often they refuse to update legal counsel on what is happening to our clients, or tell us the reason for any delays when our clients are to be released. Allowing individuals to have a private right of action against such illegal behavior could also incentivize the agency to start acting in better faith, for they may be more likely to provide more information as to what is happening due to the fear of a possible future lawsuit. Otherwise, there is no reason for DOC, or any other city agency, to adhere to the law, as there are no true repercussions.

We strongly believe that our city's laws must be strengthened with a stronger enforcement mechanism. These flagrant violations of our laws must be stopped and accountability must be introduced. This is important because under current law, even when city agencies have violated

sanctuary protections, there has been no meaningful accountability or remedy for individuals harmed. By enabling lawsuits, the New York City Trust Act would help deter future unlawful cooperation between city agencies and federal enforcement agencies, and give immigrant New Yorkers real recourse when their rights are violated. Additionally, it would strengthen trust between immigrant communities and local government institutions by unequivocally demonstrating that our sanctuary city laws and rights are enforceable.

For this reason, we urge the passage of the New York City Trust Act (Intro. 0214-2025), which would create a private right of action so that people wronged by violations of our already existing laws can seek justice in courts. This bill would make sure that city agencies can be held accountable when violations occur, helping ensure compliance with existing laws, and allowing immigrants to feel safer during their legal proceedings.

- B. [Int. 1412-2025 \(Caban\)](#): In relation to redefining terms concerning immigration enforcement to account for current enforcement practices, and prohibiting the maintenance of an office or quarters on property under the jurisdiction of the Department of Correction by federal immigration authorities.

**NYCDS supports this legislation.** A decade ago, New York City undertook a comprehensive restructuring of our city's detainer laws, fundamentally reshaping the relationship between local law enforcement and federal immigration authorities. Before these reforms, ICE maintained a permanent and deeply embedded presence on Rikers Island, where immigration officers had office space, access to detainee information, and the ability to identify and detain people directly from DOC custody. This physical presence made collusion between the two agencies seamless. In fact, this proximity created a pipeline from Rikers Island to deportation, even for individuals who were not convicted of a crime or who were detained on low-level charges. We, along with other public defenders, saw countless cases where people were funnelled into immigration detention solely because ICE had unrestricted access to our jail system.

This proposed legislation would notably prohibit ICE from maintaining a physical presence and office on DOC grounds. For individuals involved with the criminal legal system, it reduces opportunities for entanglement between criminal custody and immigration enforcement simply by virtue of where they are held. Notably, many individuals in city custody are pre-trial detainees, legally presumed innocent, and should not be funneled into a deportation pipeline simply because they are in DOC custody. Ensuring that ICE does not have physical facilities on DOC grounds would allow clients to better navigate their cases without the constant threat of an immigration arrest hanging over every interaction.

The proposed legislation is also critical for protecting constitutional rights. ICE's presence on DOC grounds undermines due process, as clients may avoid speaking with their legal counsel

out of fear of them being watched, listened to, or immediately detained upon release. It interferes with attorney-client relationships, by discouraging people from attending court dates and creating coercive dynamics in plea negotiations when clients believe any resolution could result in ICE custody. We have seen firsthand how the fear of deportation distorts the fairness of proceedings.

Additionally, there are public safety reasons to support this legislation. When people go through intake at Rikers Island, they are asked if they have any gang affiliations. This information is meant to be completely confidential, and is collected solely to ensure safety for all. Primarily, the purpose of these inquiries is to guarantee that members of rival gangs are not housed in the same areas. This creates a safer environment not only for those who are incarcerated, but also staff. Through this process, DOC staff can ensure that gang conflicts are avoided in housing areas.

This critical jail security measure was undermined, however, when Mayor Adams issued his controversial (and ultimately invalidated) [Executive Order](#) inviting ICE onto DOC grounds for the purported purpose of gang investigations. Suddenly, the confidentiality of these gang affiliation inquiries was compromised, which created a conflict over how best to advise our clients. NYCDS and our fellow NYC defender offices drafted a template letter advising all of our clients, regardless of immigration status, to no longer answer this question. If we did not adopt this blanket approach, and only our immigrant clients refused to answer, then they could more easily become targets for ICE. We also could not be assured that ICE would not share this sensitive information with other enforcement agencies that could use it to criminalize our clients.

By not answering, though, all those living and working in DOC facilities would be placed in greater danger and exposed to gang-related violence. This would make everyone in the facility less safe. Fortunately, the Executive Order in question was struck down by the courts. However, if ICE re-opens an office on DOC grounds, it could cause the same issue, and cause greater safety concerns.

For this reason, we urge the passage of Intro. 1412-2025, which would close the loophole prohibiting ICE from maintaining an office on DOC grounds.

### III. Conclusion

NYCDS supports **Intro 0214-2025 (Hanif)** and **Intro 1412-2025 (Cabán)**. They are an important step in protecting immigrant New Yorkers.

If you have any questions about my testimony, please email [policy@nycds.org](mailto:policy@nycds.org).

**Testimony by the New York Legal Assistance Group (NYLAG)  
before the NYC Council Committee on Immigration regarding:**

**Proposed Local Laws**

**December 8, 2025**

Chair Alexa Avilés, Council Members, and staff, good afternoon and thank you for the opportunity to speak to the Oversight Committee about legal services for immigrant New Yorkers. My name is Jodi Ziesemer, and I am the Policy Director, Immigration Emergency Response, at New York Legal Assistance Group (NYLAG). NYLAG uses the power of the law to help New Yorkers in need combat social, racial, and economic injustice. We address emerging and urgent legal needs with comprehensive, free civil legal services, impact litigation, policy advocacy, and community education. NYLAG serves immigrants, seniors, the homebound, families facing foreclosure, renters facing eviction, low-income consumers, those in need of government assistance, children in need of special education, domestic violence survivors, persons with disabilities, patients with chronic illness or disease, low-wage workers, low-income members of the LGBTQ community, Holocaust survivors, veterans, as well as others in need of free legal services.

All of our practice areas serve immigrant New Yorkers, and we have five units that provide immigration law services to New Yorkers across a breadth of legal matters: from humanitarian applications for survivors of sexual and gender based violence and people in need of medical support, to removal defense, to federal litigation and habeas petitions, to appellate work, citizenship, and more. In FY25, across NYLAG's immigration practice areas we provided services in 18,463 immigration cases, benefiting 48,721 individuals, including children.

We appreciate the opportunity to testify to the Committee on Immigration Committee regarding proposed city legislation to protect and support our immigrant communities and strength the legal protections extended to these communities.

### **The Immigration Landscape**

There has been a dramatic sea change in local and national immigration sphere in the ten months since the second Trump Administration has assumed power. These changes encompass high profile, unprecedented enforcement action throughout the country, violent arrests, exponential increase in detentions, and rapid deportations including to third countries. Between January and July 2025, nearly 5,000 New Yorkers have been arrested by Immigration and Customs Enforcement (ICE), more than the entire total of people arrested in 2024.<sup>1</sup> This new enforcement landscape has been marked by chaos and illegal actions by ICE and the Government, making the practice of immigration law challenging and unpredictable. While as of August 2025, there are 340,000 cases currently pending before New York State immigration courts, this number does not capture the full scale of immigration enforcement against New Yorkers, who are being put into expedited removal proceedings, having their immigration cases dismissed before trial, transferred by ICE to other states, and being detained at numbers double those from a year ago.<sup>2</sup>

In addition to well-documented enforcement action, there has been less visible policies to undermine and revoke lawful status, delay processing of documentation, and increased enforcement actions for immigrants in all parts of the immigration process from visas to naturalization. The Trump Administration has attempted, through a multi-prong approach, to eviscerate our asy-

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<sup>1</sup> <https://www.wxnews.org/local-news/2025-08-19/ice-arrests-in-new-york-surpass-2024-totals-after-recent-surge>

<sup>2</sup> [https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative/immigration-court-legal-representation-dashboard?token=4FrZTPZ-AANDchNGxbQcgxF\\_-cRsiyF2](https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative/immigration-court-legal-representation-dashboard?token=4FrZTPZ-AANDchNGxbQcgxF_-cRsiyF2)

lum system and dismantle the neutral adjudications at USCIS, Department of State, and Immigration Courts. There are very few checks on enforcement and the recent infusion of substantial funding to DHS to establish more robust infrastructure and staffing for immigration enforcement will have lasting effects for decades.

New York anticipates that the federal government will increase its targeting of New York City and New York states in the upcoming months.<sup>3</sup> State National Guard troops have been deployed to Washington D.C.,<sup>4</sup> Los Angeles, Chicago, Portland<sup>5</sup> and Memphis<sup>6</sup> on the pretext of addressing crime but actually supporting or assisting in federal immigration enforcement actions. While a state judge recently ruled that New York officials cannot be forced to cooperative with federal authorities in immigration arrests,<sup>7</sup> this does not mitigate the risk of out of state actors being brought in to enact the aggressive deportation agenda of this Administration. ICE arrests throughout the country have been violent and racist and violative of local as well as Constitutional norms. ICE enforcement efforts have extended beyond immigrant communities to target activists and faith-leaders,<sup>8</sup> journalists,<sup>9</sup> U.S. citizens,<sup>10</sup> and elected officials,<sup>11, 12 13</sup> creating an environment of fear and lawlessness.

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<sup>3</sup> [https://www.wsj.com/us-news/new-york-officials-to-team-up-with-wall-street-to-keep-national-guard-out-a3e391c9?gaa\\_at=eafs&gaa\\_n=AWetsqc8yGOxEret-QnNHvqj6psi3RxYwLFfMyId2QNk-MGIR7TolAMTrK\\_x11AbAitQ%3D&gaa\\_ts=691ca1a2&gaa\\_sig=\\_cMU1kTu59Lcr6e1CnS6J0tdM-j\\_Yh43htwyXP-URKJF\\_LBbuIKAboHtB4juhXIKe9yJBZRM9Tk947UDxUrQA%3D%3D](https://www.wsj.com/us-news/new-york-officials-to-team-up-with-wall-street-to-keep-national-guard-out-a3e391c9?gaa_at=eafs&gaa_n=AWetsqc8yGOxEret-QnNHvqj6psi3RxYwLFfMyId2QNk-MGIR7TolAMTrK_x11AbAitQ%3D&gaa_ts=691ca1a2&gaa_sig=_cMU1kTu59Lcr6e1CnS6J0tdM-j_Yh43htwyXP-URKJF_LBbuIKAboHtB4juhXIKe9yJBZRM9Tk947UDxUrQA%3D%3D)

<sup>4</sup> <https://www.pbs.org/newshour/nation/while-wary-of-trumps-motives-some-d-c-residents-uneasily-back-parts-of-the-national-guard-deployment>

<sup>5</sup> <https://www.npr.org/2025/11/16/nx-s1-5610485/national-guard-chicago-portland-texas-california>

<sup>6</sup> <https://www.nbcnews.com/news/us-news/tennessee-judge-rules-national-guard-deployment-memphis-unlawful-rcna244552>

<sup>7</sup> [BREAKING: Judge Rules New York Need Not Aid ICE Arrests](#)

<sup>8</sup> <https://www.reuters.com/legal/government/nearly-two-dozen-arrested-faith-leaders-protest-outside-chicago-area-ice-2025-11-14/>

<sup>9</sup> <https://www.cnn.com/2025/09/30/us/ice-new-york-immigration-court-journalists>

<sup>10</sup> <https://www.propublica.org/article/immigration-dhs-american-citizens-arrested-detained-against-will>

<sup>11</sup> <https://www.reuters.com/legal/government/new-york-democratic-politicians-arrested-ice-jail-manhattan-2025-09-19/>

<sup>12</sup> <https://www.nytimes.com/2025/09/18/nyregion/elected-officials-arrested-ice-new-york.html>

<sup>13</sup> <https://wisconsinexaminer.com/2025/05/09/newark-mayor-detained-by-federal-agents-during-protest-at-ice-jail/>

- **Proposed Introduction 214-A (Hanif): A Local Law to amend the administrative code of the city of New York, in relation to creating a private right of action related to civil immigration detainees and cooperation with federal immigration authorities.**

New York City current sanctuary laws prohibit the sharing of information or the cooperation of city officials in ICE enforcement activity and limiting when City officials can honor civil immigration detainees; however, these city ordinances have no enforcement mechanisms and compliance is hard to track or monitor. The use of City resources for ICE arrests erodes trust between immigrant communities and the City, weakening the relationships that are essential to ensuring community safety and constitutional policing.

Despite the goals of our current City laws, the City has kept funneling New York City residents into ICE custody. This proposed legislation provides stronger protections to restrict any official within our City from cooperating with ICE aggressive and often unlawful enforcement actions. NYLAG supports Proposed Law 214-A (NY Trust Act) to strengthen our City's sanctuary laws and create a private right of action for accountability in our existing laws.

As ICE increases its presence and the violence and frequency of raids and arrests in New York City, there will be a consequent increase in federal agents encounters with bystanders, protesters, community members, and city officials. New York City should develop similar processes for collecting reports on potential criminal acts by federal agents committed within New York City and devise a protocol for investigating, and charging criminal acts by federal officials. As we are seeing ICE action across the country, New York City can learn from these incidents and plan in advance of ICE officials making a concerted, targeted effort to attack New York City residents. Through safe reporting methods for violations of law and abuse by any state or federal agent, private rights

of action for governmental misconduct, and individual accountability, we can better protect all New Yorkers.

- **Introduction 1268 (Avilés): A Local Law to amend the administrative code of the city of New York, in relation to signage describing certain constitutional and legal protections.**

The immigration enforcement landscape has created an atmosphere of fear, mis-information, and coercing people into waiving their rights. This Proposed Legislation will ensure that information regarding the rights of individuals when interacting with federal immigration officials are publicly posted, in multiple languages, and that NYC sanctuary laws are similarly announced. NYLAG fully supports this legislation and the mandate to the Mayor's Office of Immigrant Affairs (MOIA) to create, translate, and broadcast signage regarding the rights of our city residents and create uniform messaging regarding the rights and legal protections of noncitizens in our City. Anti-immigrant rhetoric has been a prominent feature of the Trump Administration and this Proposed Law has an ancillary effect of presenting a countervailing narrative to welcome our immigrant neighbors, fight this divisive, violent, and xenophobic rhetoric, and reassure them that NYC is a safe space for them.

- **Introduction 1272 (Hanif): A Local Law to amend the administrative code of the city of New York, in relation to restricting employers from using E-Verify or any other employment eligibility verification system to check the employment authorization status of an employee or an applicant who has not been offered employment**

The E-Verify requires that anyone seeking employment register through this electronic database and receive confirmation of their eligibility to lawfully work. E-Verify was specifically developed to prevent unauthorized noncitizens from gaining employment; however, the database is rife with errors and glitches often preventing work authorized citizens and noncitizens

to be unfairly denied employment. The scope of private information housed in the system creates substantial privacy and security concerns and risks of the exposure of sensitive personal information. Now a largely voluntary program, E-Verify could soon become mandatory nationwide.

This proposed legislation would cabin the use of E-Verify for all job applicants. The bill limits when E-Verify can be used to check authorization to after an offer of employment has been extended which reasonably protects the data and information of candidates who will not be offered employment. The proposed legislation also requires public posting if an employer employs E-Verify in the job search and requires that they issues a tentative non-confirmation notice to prospective employees if they are not verified in the E-Verify system, thereby allowing them an opportunity to correct errors. NYLAG supports this proposed reasonable limitations to the use of E-Verify as it protects all New York City residents, citizens and non-citizens alike.

- **Introduction 1412 (Cabán): A Local Law to amend the administrative code of the city of New York, in relation to redefining terms concerning immigration enforcement to account for current enforcement practices, and prohibiting the maintenance of an office or quarters on property under the jurisdiction of the department of correction by federal immigration authorities**

NYLAG supports this Proposed Law to prohibit collusion between the Department of Corrections and ICE, effectively preventing further Executive Orders or actions, like the recently vacated mayoral order 50, which allowed ICE to operate in our city jails.<sup>14</sup> However, this legislation is not

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<sup>14</sup> <https://www.immigrantdefenseproject.org/community-organizations-advocates-celebrate-court-order-blocking-mayors-attempt-to-bring-ice-back-to-rikers/>

sufficiently protective of our City property and places the onus of curtailing the operation of immigration authorities on our City officials instead of enacting robust limitations in our City laws regarding where ICE is allowed to operate.

New York City has an ordinance in our city Administrative Code (§2-410) which limit federal enforcement access to city property; however, the number of exceptions and lack of enforceability have rendered this ordinance largely ineffective. We should strengthen our laws to shield our residents from ICE activity at city run shelters, schools, hospitals, parks, and administrative offices. New York City should follow the example of Chicago’s Mayor Brandon Johnson in creating an Executive Order for “ICE Free Zones” which creates clear mechanisms to prohibit federal immigration agents from using any City-owned property in their ongoing operations.<sup>15</sup>

I want to once again take the opportunity to thank Chair Alexa Avilés and the members of the Committee for their exceptional leadership and commitment to overseeing issues related to immigration in New York City, and for working to schedule this hearing today. I welcome the opportunity to discuss any of these matters with the Committee further.

Respectfully submitted,

Jodi Ziesemer

New York Legal Assistance Group

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<sup>15</sup> [https://www.chicago.gov/city/en/depts/mayor/press\\_room/press\\_releases/2025/october/city-property-executive-order.html](https://www.chicago.gov/city/en/depts/mayor/press_room/press_releases/2025/october/city-property-executive-order.html)



**New York City Council  
Committee on Immigration  
December 8, 2025**

**Written Testimony of The Bronx Defenders**

**By Rosa Cohen-Cruz, Director of Immigration Policy and Karla Ostolaza, Managing Attorney of The Immigration Practice**

Chair Avilés and Committee Members, we submit this testimony on behalf of the immigration advocates at The Bronx Defenders (“BxD”). Thank you for the opportunity to testify before you. BxD is a public defender non-profit that is radically transforming how low-income people in the Bronx are represented in the legal system. Our staff of over 450 includes interdisciplinary teams composed of criminal, civil, immigration, and family defense attorneys, as well as social workers, benefits specialists, legal advocates, parent advocates, investigators, and team administrators. Together, they collaborate to provide holistic advocacy that addresses the causes and consequences of legal system involvement. Through this integrated, team-based structure, we have pioneered a groundbreaking, nationally recognized model of representation—holistic defense—that achieves better outcomes for our clients.

Each year, we defend more than 20,000 low-income Bronx residents in criminal, civil, child welfare, and immigration cases, and reach thousands more through our community intake, youth mentoring, and outreach programs. Through impact litigation, policy advocacy, and community organizing, we push for systemic reform at the local, state, and national levels. We take what we learn from the clients and communities we serve and launch innovative initiatives designed to bring about real and lasting change.

We are testifying in support of Intro. 214, the New York City Trust Act, which would create a private right of action for individuals whose information is unlawfully shared by certain law enforcement agencies for civil immigration enforcement purposes, or who are unlawfully transferred to the custody of Immigration and Customs Enforcement (“ICE”) in violation of city sanctuary laws. We are also testifying in support of Intro. 1412, the Safer Sanctuary Act, which would clarify and strengthen the city’s sanctuary laws by expanding the list of federal agencies engaged in civil immigration enforcement and ensuring that New York City will not allow ICE to reestablish an office on Rikers Island.

## **INTRODUCTION**

There are over 3 million immigrants in New York City, amounting to nearly 40% of New York City's population.<sup>1</sup> With the increase in aggressive and violent immigration enforcement tactics under the second Trump administration, ensuring that New York City's agencies abide by our long-held sanctuary laws is more important than ever. This is particularly true given multiple instances in which the same agencies have violated these laws—at times using overt anti-immigrant language. When local law enforcement colludes with ICE, it not only defies the laws this Council enacted in 2014, but also amplifies the harms of racist and xenophobic systems of policing, criminalization, and incarceration.

We need an enforcement mechanism that incentivizes agencies to follow the city's laws that protect our most vulnerable New Yorkers and that signals New York City's commitment to repairing trust with immigrant communities. For these reasons, explained in further detail below, we urge the City Council to swiftly pass the New York City Trust Act and the Safer Sanctuary Act.

On February 15, 2023, in a hearing before this committee, we, along with our public defender colleagues, detailed the ways in which the Department of Correction ("DOC"), the Department of Probation ("DOP"), and the New York City Police Department ("NYPD") regularly and flagrantly violated or exploited aspects of the 2014 detainer laws, wrongfully prolonging detention and facilitating the transfer of immigrant New Yorkers into ICE custody. We attach that testimony as an addendum here to ensure that the long-standing and pervasive nature of this issue is reflected by our repeated need to highlight the harms caused by our city agencies.

In our testimony today, we expand upon our prior testimony by sharing more recent violations of the 2014 laws, specifically at the hands of the NYPD and DOC, and by examining the lack of accountability demonstrated by these agencies, even after being caught intentionally violating the law.

### **A. DOC has Continued to Violate the Detainer Laws Despite Being Caught and Chastised by this Council Two Years Ago.**

- i. DOC has a history of violating these laws with impunity and has yet to meaningfully address their wrongdoing*

At the February 15, 2023, hearing before this committee, the Immigrant Defense Project ("IDP") and the Black Alliance for Just Immigration ("BAJI") shared communications that had been obtained through a Freedom of Information Law ("FOIL") showing clear violations of the detainer

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<sup>1</sup> Mayor's Office of Immigrant Affairs. (2024). *Annual Report 2024: Immigrant Population Snapshot — New York City*. City of New York. (Report based on 2023 ACS)

laws, colored by explicitly anti-immigrant animus. The FOIL revealed multiple violations where DOC communicated with ICE when someone did not have a qualifying conviction, including where DOC had communicated with ICE about a person whose case was adjudicated as a youthful offender, where DOC had communicated about people who did not yet have final convictions, and where DOC communicated about someone without a qualifying conviction and signed the email with the hashtag “#teamsendthemback”. The FOIL further revealed an agreement to hold someone longer than their release time so that ICE could make an arrest.<sup>2</sup> In the aftermath of these revelations, DOC did not appear apologetic, nor did they articulate any plans to ensure similar conduct would not occur again. They shrugged off the incidents as emblems of the past and attributed them to single bad actors.<sup>3</sup> The crux of their response was an expectation that the council to simply trust them that it would not happen again.

Since then, DOC has not taken sufficient steps to train their staff or to change the culture within the agency to ensure that these harms would not be replicated. Unsurprisingly, in September 2025, The Department of Investigations issued a report revealing additional violations of the detainer laws.<sup>4</sup> DOI’s core findings were that in at least two instances a DOC investigator unwittingly violated the law, and that DOC failed to provide proper guidance and training to DOC staff about how to comply with detainer laws when working with federal agencies.<sup>5</sup> The report further found that DOC failed to report the requests for immigration enforcement assistance to the Mayor’s Office of Immigrant Affairs (“MOIA”) or post the information on the Department’s website, as required by City Law.<sup>6</sup> These findings, and the fact that DOC did not even show up to testify at this hearing, after being publicly caught violating the law multiple times, speaks to the utter lack of accountability or concern for following the law. DOC needs to know there will be real, tangible consequences for failure to follow the detainer laws. The New York City Trust Act provides those consequences.

*ii. DOC Continues to Employ a Bad Faith Reading of the Detainer Laws*

The current version of New York City’s detainer law prohibits New York City law enforcement agencies from transferring immigrant New Yorkers from DOC custody to ICE custody unless that person has been convicted of a “violent or serious conviction”<sup>7</sup> (“177 offense”) as defined in city law *and* federal immigration authorities have presented a signed judicial warrant authorizing the

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<sup>2</sup> Rainey, Deshan. Email to “VRKEROSUPERVISOR” ICE, April 5, 2017

<sup>3</sup> See generally New York City Council, *Joint Hearing of Committee on Immigration and Criminal Justice on NYC Detainer Laws Transcript* (February 15, 2023)

<sup>4</sup> New York City Department of Investigation. (2025). *Investigation report on the Department of Correction* (Report No. 38DOC). NYC Department of Investigation.

<https://www.nyc.gov/assets/doi/reports/pdf/2025/38DOC.Release.Rpt.09.25.2025.pdf>

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> NYC Admin. Code § 9-131(a)(7)(i).

arrest of that same person.<sup>8</sup> The statutory text is clear that both requirements must be met for DOC to effectuate transfer of custody to ICE<sup>9</sup>. Despite the requirement of a signed judicial warrant, this fundamental due process protection is regularly circumvented by DOC, whose interpretation of ICE “requests for notification” defies both the intent and plain reading of the applicable law.<sup>10</sup> DOC’s internal guidance and subsequent testimony before this Council have claimed that transferring custody to ICE of someone with a 177 conviction does not require a judicial warrant as long as they don’t hold the person beyond the time which they would otherwise be released.

Yet even if we were to agree with DOC’s clearly erroneous reading of the statute, DOC also makes it nearly impossible to determine whether they are holding people for additional time for ICE to arrive, aside from filing a FOIL which can take years to litigate and receive. DOC consistently offers almost no transparency about what happens when ICE issues a detainer or a request for notification. For public defenders working within these bureaucratic, carceral systems every day, the conduct we witness suggests that DOC’s response to a “request for notification” amounts to holding someone until ICE arrives, without any judicial warrant and sometimes without an actual detainer. DOC’s perfunctory testimony submitted for this hearing grounded their opposition to The New York City Trust Act in their unwillingness to account for what happens during people’s discharge process, saying “It will be difficult for the Department to differentiate cases in which an individual is held for an extended period due to an immigration detainer versus when an individual is held for an extended period due to other factors.”<sup>11</sup> This testimony once again demonstrates a stronger allegiance to ICE than to following New York’s own laws.

Our 2023 testimony included multiple examples of the delay tactics DOC uses to obfuscate their detainer law compliance. These practices have not changed. Just this year ICE was permitted to enter a cell on Rikers Island to take custody of one of our clients who had a qualifying conviction but where no judicial warrant was signed. The New York County Defenders office testified about a similar occurrence as recently as within the last couple of weeks-- in both instances, counsel was not notified of the intent to transfer custody, a judicial warrant was never presented, and ICE was permitted to enter a cell for a transfer of custody absent a judicial warrant. In neither case was any record of coordination, or accounting for the time our clients were held at Rikers provided to counsel.

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<sup>8</sup> NYC Admin. Code § 9-131(b)(1)(i).

<sup>9</sup> At the February 15, 2023 New York City Council Hearing, DOC General Counsel confirmed that they have never received any request to transfer custody of a person to ICE because they appear as a possible match in the terrorist screening database.

<sup>10</sup> See generally NYC Admin. Code § 9-131(b)(1)(i) (“The department may only honor a civil immigration detainer by holding a person beyond the time when such a person would otherwise be released from the department’s custody, in addition to such reasonable time as necessary to conduct the search specified in subparagraph (ii) [177 offenses or terrorist screening database], *or by notifying federal immigration authorities of such person’s release*, if: [a judicial warrant is presented]; *and* [177 offenses or terrorist screening database match].”). (emphasis added).

<sup>11</sup> See, Written Testimony of New York City Department of Corrections, *New York City Council Immigration Committee Hearing* (December 8, 2025)

DOC's interpretation of the detainer laws, and their objection to the New York City Trust Act, essentially asks the public to trust them that they will follow the law despite being caught violating it on multiple occasions. We should do no such thing. The New York City Trust Act will allow the public to hold the Department accountable if they continue to violate our laws and give the public a mechanism for transparency when circumstances appear suspicious and non-compliant.

## **B. NYPD Continues to Prioritize their relationship with ICE**

NYPD's relationship with ICE has similarly fueled distrust among many immigrant communities. In 2023, we testified about the ways that the NYPD will sometimes support ICE in making arrests for civil immigration enforcement, and how this visible collusion breaks trust with the public and creates widespread fear across the city. Unfortunately, it is still the case today that ICE uses the NYPD as an intimidation tool, and NYPD often willfully obliges.

In the February 15, 2023, hearing we testified about the NYPD working with ICE to break down a client's door in 2020, terrorizing the people who resided there.<sup>12</sup> This time we point to the highly publicized story of Kevin Servita-Arocha, who was caught up in the infamous Times-Square incident last year and was falsely accused of being a gang member and assaulting a police officer.<sup>13</sup> Governor Kathy Hochul calling for the detention and deportation of Kelvin and others involved without knowing the full story yet failed to comment when it was revealed that in fact it was the NYPD that initiated the physical assault against a man staying in a migrant shelter, and that Kelvin had not assaulted an officer nor fled the city as claimed.<sup>14</sup> In the meantime, the NYPD assisted ICE in breaking down the door of Kelvin's apartment in the middle of the night in the middle of Winter, holding his family under house arrest, and terrorizing them, including the young children residing there<sup>15</sup>. We reviewed the body-camera footage of the arrest, where NYPD was in the apartment of the family, with a child present, having broken down the door, displaying a friendly relationship with ICE, diving people up by asking, "is this guy yours or mine," not only dehumanizing but sending a clear message that their relationship with ICE is more important than their treatment of New Yorkers. It is notable that advocates are today sharing accounts nearly identical to prior incidents reflecting how NYPD continues to terrorize immigrant communities through their collusion with ICE. We need to pass the New York City Trust Act to make sure we are not back here in two years sharing new yet identical accounts.

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<sup>12</sup> See generally New York City Council, *Joint Hearing of Committee on Immigration and Criminal Justice on NYC Detainer Laws Transcript* (February 15, 2023)

<sup>13</sup> Dinan, Stephen, "ICE seizes two Venezuelan gang members after NYC police assault," *The Washington Times*, (Thursday, February 15, 2024) <https://www.washingtontimes.com/news/2024/feb/15/kelvin-servita-arocha-wilson-juarez-who-attacked-n/>

<sup>14</sup> Servita-Arocha, Kelvin Josue, "The NYPD and ICE Unfairly Abused Me," *The Daily News*, (October 4, 2024)

<sup>15</sup> Hogan, Gwynne, "Migrants at Margins of Times Square Police Scuffle Face Upended Lives," *The City*, (April 5, 2024) <https://www.thecity.nyc/2024/04/05/migrants-times-square-scuffle-upended-lives/>

With respect to the detainer law, NYPD is permitted to honor an immigration detainer under a three-pronged analysis: if an individual has been convicted of a violent or serious crime *and* has been previously deported and returned to the United States without permission *and* they are presented with a judicial warrant.<sup>16</sup> We at the Bronx Defenders have noticed an increase in collusion between NYPD and ICE under the guise of joint-taskforces, as we suspect was in effect during Kelvin’s arrest. These taskforces would potentially be exceptions to the detainer laws but are not meant to be used for civil immigration enforcement purposes-- rather for other federal criminal law enforcement. The lack of accountability and opaqueness in the use of joint taskforces calls for the passage of the New York City Trust Act to ensure that NYPD is not merely using these mechanisms as pretext to circumvent the law.

As with DOC, the NYPD was also recently found in a DOI report to have violated New York’s sanctuary laws by aiding federal authorities in connection with enforcement of the federal civil immigration law.<sup>17</sup> The report also found that the NYPD does not fully comply with documentation and reporting requirements concerning requests for assistance with federal civil immigration enforcement and found gaps in the NYPD’s current policies and practices that raise the risk of improper information sharing or assistance to federal authorities for purposes of civil immigration enforcement.<sup>18</sup> Like DOC, NYPD did not bother to attend this hearing, despite having been found to have violated the laws just last week.

At the Immigration Committee hearing in February 2023, Michael Clarke, The Director of Legislative Affairs for the NYPD, testified that “It’s important to state unequivocally that the NYPD does not engage immigration enforcement.” He went on to say, “if certain groups of New Yorkers do not feel confident they can interact with the police, they will become permanent victims to be preyed upon by criminals with no fear of the consequences of their actions.<sup>19</sup>” The sentiment that the NYPD shared two years ago: that their collusion with ICE would cause communities to be at risk of victimization and violence is one we can agree with. However, this sentiment, without a real commitment to end collusion with ICE and re-build trust with communities, is hollow, especially where the violent actors to fear are ICE agents themselves. The New York City Trust Act would add real teeth to the sanctuary laws and incentivize the NYPD to do better.

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<sup>16</sup> NYC Admin. Code § 14-154(b)(1)(ii).

<sup>17</sup> New York City Department of Investigation, *NYPD Civil Immigration Enforcement Report: Investigation of NYPD’s Compliance with Local Laws Restricting City Assistance with Federal Civil Immigration Enforcement*, Release No. 49-2025 (New York: NYC DOI, Dec. 3, 2025), <https://www.nyc.gov/assets/doi/reports/pdf/2025/49NYPD.SancLawsRelease.Rpt.12.03.2025.pdf>

<sup>18</sup> *Id.*

<sup>19</sup> See, Testimony of Clarke, Michael, Director of Legislative Affairs for the New York City Police Department, New York City Council, *Joint Hearing of Committee on Immigration and Criminal Justice on NYC Detainer Laws Transcript* (February 15, 2023)

### **C. NYC Should Not Allow ICE to Re-Establish an Office on Rikers**

For years ICE maintained an office on Rikers Island which allowed them unfettered access to the people we represent. They would use this access to question people without counsel and coordinate closely with DOC to disappear community members at all stages of the criminal legal system process, severely undermining due process and access to counsel in both the immigration and criminal legal systems. With the passage of the 2014 detainer laws, federal immigration authorities were prohibited from maintaining an office on DOC land for the purpose of investigating violations of civil immigration law.<sup>20</sup>

Since then, ICE has not operated an office on the island. It wasn't until this year, in what appeared to be a self-serving effort to avoid criminal prosecution, outgoing Mayor Eric Adams attempted to exploit language in the current law by issuing an executive order to restore the presence of ICE on Rikers.<sup>21</sup> This attempt was ultimately thwarted by strong unified advocacy and struck down in state court.<sup>22</sup>

Intro. 1412 would amend the law to remove the portion that Mayor Adams attempted to exploit. The bill would also revise how immigration authorities are defined to reflect the multitude of federal agencies now engaged in immigration enforcement under the second Trump administration. Both are critical amendments to protect the people we serve, and we hope this Council will swiftly pass this legislation.

### **CONCLUSION AND RECOMMENDATIONS**

What we are asking for here today, what we have been asking for years, is accountability for these agencies to simply follow the law. People should have a right to get answers and seek recompense when New York City's agencies fail to follow the laws and illegally collude with ICE. We urge the New York City Council to pass Intros 214 and 1412. We specifically support amendments to Intro. 214 to extend to other agencies beyond DOC, DOP, and NYPD... Local law enforcement agencies' failure to comply with local law has a long-lasting impact on the lives who these agencies disregard when violating the City's detainer laws. By passing Intros. 214 and 1412 this Council will take a meaningful step to prevent such future harm and instead affirm the humanity of those impacted.

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<sup>20</sup> NYC Admin. Code § 9-131(h)(2).

<sup>21</sup> Reuven Bleu and Gwynne Hogan, *Adams Administration Inks Executive Order Allowing ICE Back on Rikers Island*, The City (April 9, 2025), <https://www.thecity.nyc/2025/04/09/rikers-island-ice-executive-order/>.

<sup>22</sup> Luis Ferre-Sadurni, *Adams Administration Move to Let ICE Into Rikers Is Illegal, Judge Rules*, N.Y. Times (Sep. 8, 2025), <https://www.nytimes.com/2025/09/08/nyregion/judge-adams-ice-rikers.html>.

# **ADDENDUM**



**New York City Council  
Committees on Immigration and Criminal Justice  
Oversight Hearing on The New York City Detainer Law  
February 15, 2023**

**Written Testimony of The Bronx Defenders**

Chairs Hanif and Rivera and Committee Members, we are immigration advocates at The Bronx Defenders (“BxD”).<sup>23</sup> Thank you for your attention to these critical matters and for the opportunity to testify before you today. We are testifying today in support of Intros. 184 and 185 as a way to protect immigrant community members and strengthen the limitations on any communications between New York City agencies, including Department of Corrections (“DOC”) and the New York Police Department (“NYPD”) and Immigration and Customs Enforcement (“ICE”), and lastly to pass Intro.158, to allow those unlawfully transferred to ICE custody a private right of action.

**INTRODUCTION**

Immigrants comprised **37.2** percent (**3.14** million) of New York City’s population in 2017. This population includes naturalized citizens accounting for **55.0** percent (**1,727,000**), and the remaining noncitizen population is composed of 942,000 immigrants with green cards or other legal status; and **507,000** are undocumented immigrant community members<sup>24</sup>. Since 2017, these

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<sup>23</sup> The Bronx Defenders is a public defender non-profit that is radically transforming how low-income people in the Bronx are represented in the legal system, and, in doing so, is transforming the system itself. Our staff of over 350 includes interdisciplinary teams made up of criminal, civil, immigration, and family defense attorneys, as well as social workers, benefits specialists, legal advocates, parent advocates, investigators, and team administrators, who collaborate to provide holistic advocacy to address the causes and consequences of legal system involvement. Through this integrated team-based structure, we have pioneered a groundbreaking, nationally-recognized model of representation called *holistic defense* that achieves better outcomes for our clients. Each year, we defend more than 20,000 low-income Bronx residents in criminal, civil, child welfare, and immigration cases, and reach thousands more through our community intake, youth mentoring, and outreach programs. Through impact litigation, policy advocacy, and community organizing, we push for systemic reform at the local, state, and national level. We take what we learn from the clients and communities that we serve and launch innovative initiatives designed to bring about real and lasting change.

<sup>24</sup> <https://www1.nyc.gov/assets/opportunity/pdf/immigrant-poverty-report-2017.pdf>.

numbers have continued to rise, and the need to take action for a safer New York for us all, has never been greater.

Freedom to live without fear of being arrested by ICE and ending the terror of family separation is at the heart of this testimony, and in the hearts of all New Yorkers. Until the City takes the necessary steps to protect immigrant communities, New York City's inaction and compliance with ICE leaves many immigrant New Yorkers at risk. The City Council must strengthen New York City's detainer laws, originally passed by this Council in 2014. Failing to strengthen these laws ignores the reality that the Department of Corrections ("DOC"), the New York Police Department ("NYPD"), and the Department of Probation ("DOP") repeatedly evade their obligations to comply with City law to instead hand over immigrant New Yorkers for ICE arrest, detention, and deportation.

State and local law enforcement conspiring with ICE not only undermines the laws this City Council set forth in 2014, but also intensifies the harms of a racist and xenophobic systems of policing, criminalization, and incarceration. When New York law enforcement agencies violate local laws passed by this City Council to protect immigrant New Yorkers, it dishonors the basic rights of immigrant New Yorkers and creates pervasive fear and distrust that ultimately deepens the belief that New York City is not safe. New York law enforcement agencies must respect our local laws and prioritize the safety and wellness of our community. In the streets of New York, where Black, Latinx, and other marginalized people are under constant threat, the New York City Council must take immediate corrective action by:

- Passing Intro 184, which ensures that NYPD cannot communicate with ICE without a judicial warrant;
- Passing Intro 185, which ensures that DOC & DOP cannot communicate with ICE without a judicial warrant; and
- Passing Intro 158, which creates a private right of action for violations of the detainer laws.

DOC, DOP, and NYPD regularly and flagrantly exploit aspects of the 2014 detainer laws that allow communication with ICE without ICE ever producing a signed judicial warrant. In doing so, these city agencies wrongfully prolong a person's detention and facilitate transfers of immigrant New Yorkers into ICE custody. In this testimony we will detail several types of violations that BxD has tracked when representing immigrant New Yorkers, including:

- A. Despite ICE never producing a signed judicial warrant, DOC transfers people convicted of a "violent or serious crime" into ICE custody;
- B. Recently released documents of DOC/ICE correspondence corroborate BxD's long-time suspicions that DOC unlawfully communicates with ICE about people in its custody;
- C. NYPD and DOP collaboration with ICE in making arrests and sharing information; and

#### D. NYC Detainer Laws Prejudice People in Resolving Criminal Cases.

The Council will also hear from community members and advocates detailing explicit violations of the City’s detainer law.<sup>25</sup> Taken together, these violations demonstrate the serious weaknesses in our existing detainer laws and highlight the urgent need to create a meaningful and responsive shift to protect immigrant New Yorkers. In addition to detailing violations of the detainer law, we must not forget that part of what is at stake is conditions in ICE detention in New York State, so the final portion of our testimony will be to remind City Council why these laws matter and why we must protect our communities from the harmful and inhumane conditions experienced in ICE detention.

##### **A. Despite ICE never producing a signed judicial warrant, DOC transfers people convicted of a “violent or serious crime” into ICE custody.**

- i. DOC guidance” defies the plain reading of the statute to circumvent the 2014 detainer laws.*

New York City’s detainer law prohibits New York City law enforcement agencies from transferring immigrant New Yorkers from DOC custody to ICE federal custody unless that person has been convicted of a “violent or serious conviction”<sup>26</sup> (“177 offense”) as defined in city law *and* federal immigration authorities have presented a signed judicial warrant authorizing the arrest of that same person.<sup>27</sup> The statutory text is clear that both requirements must be met for DOC to effectuate transfer of custody to ICE, both when honoring an ICE detainer and ICE requests for notification of a person’s release from DOC custody.<sup>28</sup>

Despite the requirement of a signed judicial warrant, this fundamental due process protection is regularly circumvented by DOC, whose interpretation of ICE “requests for notification” defies both the intent and plain reading of the applicable law.<sup>29</sup> Five years after the detainer laws took effect, DOC issued an Operations Order entitled “Interactions with Federal Immigration Authorities,”<sup>30</sup> detailing its procedures for compliance with DHS detainers and requests for notification:

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<sup>25</sup> Correal, Annie and Shanahan, Ed, “*He Was Caught Jaywalking. He Was Almost Deported for It*”, N.Y. Times (March 11, 2021) <https://www.nytimes.com/2021/03/11/nyregion/daca-ice-nyc-immigration.htm>.l.

<sup>26</sup> NYC Admin. Code § 9-131(a)(7)(i).

<sup>27</sup> NYC Admin. Code § 9-131(b)(1)(i).

<sup>28</sup> At the February 15, 2023 New York City Council Hearing, DOC General Counsel confirmed that they have never received any request to transfer custody of a person to ICE because they appear as a possible match in the terrorist screening database.

<sup>29</sup> See generally NYC Admin. Code § 9-131(b)(1)(i) (“The department may only honor a civil immigration detainer by holding a person beyond the time when such a person would otherwise be released from the department’s custody, in addition to such reasonable time as necessary to conduct the search specified in subparagraph (ii) [177 offenses or terrorist screening database], *or by notifying federal immigration authorities of such person’s release*, if: [a judicial warrant is presented]; *and* [177 offenses or terrorist screening database match].”). (emphasis added).

<sup>30</sup> The City of New York Department of Corrections Operations Order No. 9/19.

[DOC] intends to cooperate with DHS's written request for advance notice of release, whether such request appears on an Immigration Detainer or otherwise, and cooperation in transferring custody of the inmate to DHS on [DOC] property by notifying DHS of the time the inmate would ordinarily be released. *In other words, the pick up by DHS shall not extend the time normally needed to complete the discharge process*, and the Department will not detain such an individual beyond the time authorized under New York State and local law.

*Id.* (emphasis added).

According to this guidance, so long as a person is not detained beyond the time it takes to complete the regular discharge process, DOC can readily respond to ICE's requests for notification and transfer custody of that person to ICE. In this way, DOC can deftly — yet inconsistently — testify that they have not violated the detainer laws when honoring ICE “requests for notification” as they have not held people for longer than the discharge process required while simultaneously admit that since 2014 enactment of the City's detainer laws DOC has never received a signed judicial warrant from ICE.<sup>31</sup> DOC General Counsel Paul Shechtman similarly reiterated this DOC position at the February 15, 2023 New York City Council hearing, stating “We’re not holding onto ‘em if ICE isn’t there” and that DOC hadn’t received a signed judicial warrant in the past five years.<sup>32</sup> These jaw-dropping admissions are relevant for several critical reasons.

- ii. *DOC's non-transparent discharge processes further gut the 2014 detainer laws by preventing timely and impactful accountability for immigrant New Yorkers seeking to challenge their ICE transfer.*

While DOC has consistently testified at two City Council hearings that they have not received a signed judicial warrant from ICE, in practice, DOC is non-transparent about its discharge processes, thereby revealing that the City's detainer laws are effectively gutted. As a matter of standard practice, DOC provides practically no transparency about its discharge process when ICE issues a detainer request or request for notification. As public defenders managing these bureaucratic, carceral systems every day, DOC honoring a “request for notification” often looks like DOC indefinitely holding a person until ICE picks them up for arrest without ever producing a signed judicial warrant, or ICE ever even issuing a detainer. In practice, DOC's distinctions appear meaningless yet the harms remain the same.

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<sup>31</sup> See generally New York City Council, *Committee on Immigration Hearing Transcript on NYC Detainer Laws Transcript* (June 9, 2021), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=4972029&GUID=8F48A1CF-7885-4CFC-AD9A-6FA452D31892&Options=&Search=>.

<sup>32</sup> Arya Sundaram and Matt Katz, ‘#teamsendthemback’: *Emails reveal cozy relationship, cooperation between NYC correction officers and ICE*, Gothamist (Feb. 16, 2023), <https://gothamist.com/news/teamsendthemback-private-emails-reveal-cozy-relationship-cooperation-between-nyc-correction-officers-and-ice>.

As an example, in March 2021, a BxD client finished a six-month sentence on Rikers Island for a 177 conviction and was informed by DOC officials that he was going to be released alongside two other people on the same day. On his actual release day, he was the only person transported from his housing unit to a separate holding cell to wait without any explanation. Two hours later, officers entered the holding cell and told him to follow them. It was only then that he learned the officers were ICE and that he was being transferred to ICE detention to face deportation. This BxD client never received any copy of a judicial warrant for his arrest, and as DOC has testified, they have not received a signed judicial warrant from ICE in this time period.

DOC's actions speak for themselves in explaining how this is a violation of NYC's detainer laws. As detailed by their own guidance interpreting the 2014 detainer laws, DOC is permitted to only notify ICE of the time of a person's release, but they are not permitted not to hold a person in their custody for any additional time beyond the regular discharge process.<sup>33</sup> Here, DOC never accounted for the time he was detained in the holding cell, yet an immigrant New Yorker nonetheless waited in DOC custody for two hours, without explanation, after completing his sentence instead of being freed to his community. Then, ICE officers physically entered a Rikers Island holding cell, ordered him to follow them, ushered him out of the cell, and then handcuffed him to initiate the ICE deportation process. And this all occurred without a judicial warrant ever being produced.

That we as advocates and public defenders are left to decipher DOC's non-transparent discharge practices is a consistent theme in our experiences representing criminalized immigrant New Yorkers held at Rikers Island. In October 2017, a BxD immigration attorney went to Rikers Island to meet with a client scheduled for release after completing his sentence. The attorney called DOC a day in advance to inform that she would meet with the client at 10:00AM to ensure his safe and timely release. DOC informed the attorney that ICE issued a detainer and that ICE would be permitted until midnight on the release day to take the client into ICE custody. The attorney asked DOC if ICE produced a signed judicial warrant, but was not given a direct answer. Accordingly, the next day the BxD attorney arrived at Rikers Island at 9:00AM and remained there until approximately 2:00PM. During this time, the attorney repeatedly asked DOC to meet with her client but consistently denied the opportunity to speak to or see the client. She was instead told by DOC officers to wait, to talk to other officers, and even shuttled back and forth between different buildings. After waiting for over four hours, DOC informed the attorney that the client had been transferred to ICE during the time she had been waiting at Rikers Island.

As evidenced in this lived experience, DOC's lack of transparency is harmful as it limits advocates' ability to challenge whether a person is held beyond the time necessary to effectuate the discharge process and ultimately whether DOC violates the City's detainer laws. Though the detainer law

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<sup>33</sup> *Id.*

authorizes DOC to continue detention past release for a reasonable amount of time to verify whether they may communicate with ICE about a particular individual,<sup>34</sup> what constitutes a “reasonable amount of time” is not defined. Similarly, when advocates inquire about the existence of a judicial warrant, DOC is either non-responsive or otherwise refers to its compliance with ICE as honoring a “request of notification”, in effort to somehow mollify and justify its actions despite a nonexistent judicial warrant as consistent with the City’s detainer laws when it is not. Finally, DOC’s allegiance to ICE not only violates its own internal policies by extending a person’s time in DOC custody to facilitate an ICE arrest, but they compromise a person’s right to counsel.

DOC’s lack of transparency not only allows the agency to evade accountability by immigrant New Yorkers and their advocates, but it also allows them to regularly conspire with ICE agents to further harm immigrant New Yorkers. Transferring a person into ICE custody is a physically violent, terrifying experience: a shackled person in a cage is temporarily unshackled by DOC officers, only to then be immediately re-shackled by ICE officers, to then be transported to an unknown location and placed in a ICE cage for an indefinite amount of time, to face permanent exile by deportation. DOC facilitating an ICE arrest without a signed judicial warrant ever being presented as required by City law clearly violates the letter and intent of the law, and eviscerates the protections the detainer laws are meant to confer. To put simply, DOC has concocted a bad faith reading of local law in an attempt to bureaucratically gloss over the harms they inflict on immigrant New Yorkers in their custody who otherwise should be free. This City Council has a responsibility and opportunity to rectify these harms in passing Intros. 158 and 185, and we urge you to follow through on the prior Council’s promise to immigrant New Yorkers.

*iii. Even where people are not transferred to ICE custody, DOC’s inefficient, non-transparent assessment of whether to comply with an ICE detainer wrongfully prolongs non-citizen’s detention.*

DOC’s lack of transparency and accountability is a serious issue, even for people who are not ultimately transferred to ICE custody. In our experience, people in jail with immigration holds remain in custody longer after their scheduled release time than those without lodged detainers. In the 2021 City Council hearing on NYC’s detainers laws, DOC claimed that they would not be able to account for the reason for delay in release,<sup>35</sup> and, as detailed *infra*, DOC is eager to extend people’s detention regardless of the pain, trauma, and fear they instill in people in detention and the families who are doing whatever they can to reunite with their loved ones.

In late August 2020, DOC’s Department of Custody Management confirmed, upon inquiry by a BxD attorney, that a detainer would not be honored for the BxD client. Nevertheless, on September

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<sup>34</sup> N.Y.C. Admin. Code § 9-131(b)(1).

<sup>35</sup> New York City Council Committee on Immigration, Testimony of Kenneth Stukes, Bureau Chief of Security, New York City Department of Corrections, June 9, 2021.

2, 2020, when the client's family arrived to pay bail, a DOC Captain informed the client's family that a "special warrant" had been lodged *prior* to our conversations with DOC and that DOC was required to call ICE about their family member's release from DOC custody. The Captain further informed the client's family that it "wouldn't make sense" to bail him out because ICE would take custody of our client. Consequently, the family was told they would not be able to pay bail. Two days later, the client's family was still not able to pay bail until our office intervened again and reminded DOC there was no lawful ground for his detention in their custody and that DOC must immediately release the client. While two days may not mean much to DOC, it is an eternity for a family trying to be reunited. For them, these were a terrifying, stressful, and painful two days of not knowing if they would all be together again. Had the Bxd client been a U.S. citizen, this never would have happened.

Similarly, on March 12, 2021, a BxD client was ordered released on their own recognizance by the criminal court, but held past his release date at Rikers Island due to an ICE detainer. This client did not have a qualifying conviction so an ICE detainer could not be honored under the law. Despite that, our client was not released until early in the morning on March 13, 2021. During the evening of March 12, our office tried to contact Captain Rainey and DOC Counsel's office but received no response. Ultimately, we contacted representatives from the Mayor's Office of Immigrant Affairs to assist in securing the client's release.

Even if DOC could provide a minute-by-minute accounting of the time this or any other person is held when determining whether to honor an ICE detainer or release a person to their community, the fundamental problem would remain: DOC prioritizing their relationships with ICE over their own duty to abide by City law, let alone their duties to the people in their custody.

**B. Recently released documents of DOC/ICE correspondence corroborate BxD's long-time suspicions that DOC unlawfully communicates with ICE about people in its custody.**

- i. DOC violates the 2014 detainer laws by communicating with ICE about people in their custody who do not have a qualifying 177 conviction.*

DOC not only fails to account for discharge timing, but also fails to adequately account for their communications with ICE. Recently, the Immigrant Defense Project ("IDP") and the Black Alliance for Just Immigration ("BAJI") obtained communications between DOC and ICE through a Freedom of Information Law ("FOIL") request documenting the regular correspondence between DOC and ICE. While the documents obtained by IDP and BAJI indicate that ICE and DOC communicate by e-mail, they similarly establish that DOC staff frequently communicate with ICE by phone yet fail to log the timing and substance of those phone conversations<sup>36</sup>. Like transparency around DOC's discharge processes for people who ICE issues detainers or "requests for

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<sup>36</sup> See attached addendum

notification”, the timing and substance of DOC communications with ICE are important in ensuring DOC’s basic compliance with its legal obligations under local law. This lack of transparency is also particularly harmful where it appears that DOC communicates with ICE even where a person has not been convicted of a 177 offense.

Even though it is undisputed that DOC cannot respond to a request for notification or an ICE detainer unless the subject of the request has actually been *convicted* of a 177 offense, we have had reason to believe DOC regularly communicates with ICE about people who are not convicted of a 177 offense. We suspect ICE receives advance notice of plea dates where clients are charged with and ultimately plead to a 177 offense by observing ICE appearing moments after a BxD client accepts a plea to a 177 offense in criminal court. For example, in April 2022, we represented a non-citizen with no prior criminal convictions who was charged with one of the 177 enumerated offenses. Despite not being *convicted* of a 177 offense, DOC told the client’s friend “not to bother” paying bail because DOC believed there was an ICE hold. The BxD attorney advised the client’s friend to pay bail, but DOC continued to deny the client’s release, requiring the BxD attorney to escalate the wrongful delay to the DOC Legal Department and the Mayor's Office of Criminal Justice (“MOCJ”). MOCJ responded stating that a “special unit” was looking into the ICE detainer and would get back to us after they reviewed the detainer. The client was held for two additional hours, *despite no prior criminal conviction history and only a pending 177 charge*.

The FOIL records obtained by IDP and BAJI have also confirmed our suspicions that DOC has not only communicated about people where there are no 177 offenses, but violated the law gleefully and with clearly articulated disdain for the people we defend. In a lengthy back and forth exchange, in November 2015 DOC identified a non-citizen New Yorker soon to be released to his community at the request of ICE despite knowing that the person in DOC custody did not have a qualifying conviction. Clarifying that the person was in DOC custody for a parole violation, DOC disturbingly signed off its e-mail with the hashtag “#teamsendthemback”, presumably to communicate DOC’s solidarity with ICE’s enforcement efforts. After the DOC Legal Department clarified that the person should be processed for discharge to the community, Capt. Rainey informed ICE the bad news: “The court provided this office with a receipt for his paid bail back in 2006. They are satisfied with the bail conditions and with no judicial warrant our legal division states he should be process for discharge. SORRY” (sic). Later that day, ICE replied: “No worries, it is what it is! Can’t fight city hall, literally! Thanks for the info, we’ll go out and get him. I already have a team ready to go find him.” Three days later, DOC replied with another “update”: “Here is an update. Judge placed another \$1.00 bail on the case. He paid the bail in court and is on his way back to DOC. I will be discharging him to the community. He should be discharged sometime tonight or wee hours in the morning. FYI=next court date 12/15/16. SORRY”.<sup>37</sup>

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<sup>37</sup> Rainey, Deshan. Email to ICE Officer Robert Speruggia, November 16, 2015, *See Addendum, pages 15-24*

In a 2017 e-mail exchange between Captain Deshan Rainey and ICE Officer Robert Speruggia, ICE sent a list of people in DOC custody. In response, DOC explained that one person on ICE's list is "sentenced however his case must be sealed or adjudicated as a youthful Offender nothing shows in the CRIMS or Rap sheet and he doesn't have a detainer lodged on him." DOC further clarified that another two people on ICE's list had not yet been sentenced. In response, ICE asked: "The two that are pending sentence, upon conclusion of sentencing, would their detainers be honored?" DOC responds: "Yes. Let's hope they both go upstate."<sup>38</sup> This communication was on its face illegal under the detainer law. There were no qualifying convictions to allow DOC to communicate any information about the people in their custody to ICE.

These communications are malicious and show a culture of anti-immigrant animus within DOC. DOC must be given a clear and simple directive: there can be no communication with ICE under any circumstances unless ICE produces a judicial warrant.

ii. *In clear defiance of City law, DOC affirmatively communicates with ICE to facilitate ICE arrests.*

DOC's actions actually demonstrate an eagerness and enthusiasm to collaborate with ICE. In an e-mail dated September 26, 2017 between DOC Captain Deshan Rainey<sup>39</sup> and ICE Officer Nicole Francis, Captain Rainey assured ICE that DOC would continue to detain someone for a day past their release date to allow ICE the opportunity to pick them up for arrest.<sup>40</sup> In another email dated April 5, 2017, Captain Deshan Rainey notified ICE that a community member's release time depends on when ICE will arrive to make the arrest, stating: "Please advise me what your arrival time will be so I may inform the facility and have the subject waiting for your arrival."<sup>41</sup> From these communications we know that DOC not only transferred people without ICE ever producing a signed judicial warrant, but DOC in fact delayed the timely release of an immigrant New Yorker from Rikers Island to facilitate an ICE arrest. These are clear violations of the detainer law, and cast new light on our experiences with release delays that have allowed our clients to be arrested by ICE.

### **C. NYPD and DOP collaboration with ICE in making arrests and sharing information.**

NYPD's relationship with ICE has understandably fueled distrust among many immigrant communities. One of the most pervasive reasons for this distrust is that ICE frequently identifies themselves as police, or even NYPD when attempting to arrest individuals in their homes. ICE also sometimes engages the NYPD to assist it in making an arrest for a purely civil immigration

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<sup>38</sup> Rainey, Deshan. Email to ICE Officer Robert Speruggia, December 18, 2017, *See Addendum, pages 6-14*

<sup>39</sup> Captain Deshan Rainey is a DOC Supervisor in the Custody Management/ICE Unit, who oversees reviews of ICE detainers and requests for notification.

<sup>40</sup> Rainey, Deshan. Email to ICE Officer Nicole Francis, September 26, 2017, *See Addendum, page 1-4*

<sup>41</sup> Rainey, Deshan. Email to "VRKEROSUPERVISOR" ICE, April 5, 2017, *See Addendum, page 5*

matter. In other instances, NYPD supports ICE in effectuating arrests together in the community, and ICE similarly supplies NYPD protection in the community. These interactions are terrifying for the communities we serve. During the June 2020 George Floyd protests, ICE provided protection for NYPD precincts and NYPD also worked with ICE to arrest and detain a protester who was Puerto Rican and a U.S. citizen.<sup>42</sup> In February 2020, ICE hospitalized Gaspar Avendano-Hernandez after tasing him more than six times. In that same interaction, ICE tased and shot Eric Diaz-Cruz in the hand and face, also resulting in his hospitalization.<sup>43</sup> NYPD then escorted ICE officers as they transferred Mr. Avendano-Hernandez to ICE detention after he was discharged from the hospital.<sup>44</sup> ICE uses the NYPD as an intimidation tool, and NYPD often willfully obliges.

NYPD, like DOC, wrongfully cooperates with ICE to enforce immigration laws in our city. In May 2020, a BxD client was woken up by loud knocking on his door. The three officers at his door began yelling, "If you don't open the door, we're going to knock it down and arrest everyone." They yelled threats and said they would knock the door down without asking someone to open it first. No one in the apartment opened the door because they were terrified. As a result, the officers continued banging so hard that they damaged the door, later requiring its replacement. BxD obtained the apartment building's video footage of this incident, which showed NYPD officers with ICE officers attempting to enter our client's apartment by force.<sup>45</sup> When our client went to the local precinct to find out more information he was told there was no record of the NYPD being at his apartment that morning.

With respect to the detainer law, NYPD is permitted to honor an immigration detainer under a three-pronged analysis: if an individual has been convicted of a violent or serious crime *and* has been previously deported and returned to the United States without permission *and* they are presented with a judicial warrant.<sup>46</sup> Absent a judicial warrant, the statute authorized NYPD to hold someone who meets the above criteria for up to 48 hours in order for ICE to attempt to secure a

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<sup>42</sup> See Matt Katz, *ICE Helped To Protect NYPD Station Houses During Protests*, WNYC (June 9, 2020), <https://www.wnyc.org/story/ice-helped-protect-nypd-station-houses-during-protests/>; see also Mazin Sidahmed, *Video Shows ICE Agents Arresting a Protestor in NYC*, Documented (June 5, 2020), <https://documentedny.com/2020/06/05/video-shows-ice-agents-arresting-a-protestor-in-nyc/>.

<sup>43</sup> Wes Parnell, Rocco Parascandola, Thomas Tracy and Larry McShane, *ICE agents, while arresting undocumented Mexican immigrant, wind up shooting second man in wild Brooklyn street brawl*, NY Daily News (Feb. 6, 2020), <https://www.nydailynews.com/new-york/nyc-crime/ny-ice-agent-shoots-man-in-face-in-brooklyn-20200206-7db5cmlbqff2hflbs5pnssipuu-story.html>.

<sup>44</sup> Wes Parnell, *'He was crying, crying': Family of ICE detainee held after Brooklyn raid-turned-shooting share story* (Feb. 17, 2020), <https://www.nydailynews.com/new-york/ny-ice-detainee-mistreatment-brooklyn-raid-shooting-20200217-gd3b7ooapfdb5gep3dfq3uuc3e-story.html>.

<sup>45</sup> Our attempts to verify NYPD's presence on the video were unsuccessful as they raised privileges or were otherwise unresponsive to the substance of our FOIL requests.

<sup>46</sup> NYC Admin. Code § 14-154(b)(1)(ii).

judicial warrant. This allowance is at odds with the court's decision in *Francis* and should be amended per our recommendations below<sup>47</sup>.

A common scenario for our clients occurs at arraignments. Typically, an ICE detainer will be lodged while someone is in arraignments and the judge or prosecutor will be made aware of the detainer. We see this impact our clients negatively in two ways. First, often judges will not release people if they are concerned that ICE is targeting them for detention. In the second scenario, a judge may release someone, either through bail or on their own recognizance, but the person will remain detained for a prolonged period of time while NYPD considers how to respond to the detainer. Even a brief period of prolonged detention is detrimental to the person held in a cage and separated from their loved ones. Simplifying the detainer law to requiring a judicial warrant would hasten the process and make clear immediately whether or not NYPD could comply.

The Department of Probation ("DOP") has also collaborated with ICE in violation of the NYC detainer laws. In November 2022, a non-citizen represented by The Bronx Defenders took a plea to a misdemeanor with a sentence of probation. However, the probation report presented to the court stated that the client and their siblings were "illegal aliens" and that "based upon information provided to ICE, the law enforcement support center could not find a match in the database." This statement provided directly from DOP speaks for itself: DOP wrongfully communicated with ICE. In another instance, in January 2020, a BxD client was contacted by law enforcement to appear at a police precinct in the Bronx as a requirement of their probation. Upon arriving at the precinct, the BxD client was immediately detained by ICE and shipped to an ICE detention in New Jersey, where they remained for more than a year at the height of the COVID-19 pandemic.

To state the obvious: NYPD and DOP do not work for ICE but the City of New York. In 2014, the City of New York passed laws to limit NYPD's ability to collaborate with ICE in arresting immigrant New Yorkers for deportations and these laws were extended to the DOP.<sup>48</sup> Any violations of these laws by both agencies are inexcusable. New York City agency employees are first and foremost accountable to New Yorkers. This is true no matter where a person was born or criminal arrest history. Colluding with ICE dangerously shifts that dynamic and cases like these demonstrate that DOC employees will put the requests of ICE above City law, their own duties to people in their custody, attorneys they interact with, and New Yorkers as a whole because ICE relies on them to facilitate arrests.

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<sup>47</sup> *People ex rel. Wells o.b.o. Francis v. DeMarco*, 168 A.D.3d 31 (N.Y. App. Div. 2018).

<sup>48</sup> local law AC 14-154 of 2017

#### **D. NYC Detainer Laws Prejudice People in Resolving Criminal Cases.**

Finally, even the possibility of communication with ICE by DOC or NYPD negatively impacts immigrant New Yorkers as they navigate the criminal legal system. Immigrants who are incarcerated while their cases are pending have fewer safe case resolutions at their disposal due to the City's collaboration with ICE. An incarcerated immigrant who would benefit from and wishes to participate in inpatient treatment programs outside of DOC may not be able to risk paying bail or seeking a disposition from the court that includes programming if they believe that ICE will arrest them as soon as they are released from jail.

Many criminal defense attorneys without immigration counsel do not understand the parameters of the detainer law. Our deportation defense attorneys who represent clients in the NYIFUP program regularly encounter clients who did not realize they were taking a plea to an offense that would cause them to lose detainer law protections. Even if a client is properly advised about the legal consequences that a particular disposition might have on their immigration status, they might not have been advised of the consequences that such a plea might have on enforcement consequences. Indeed, given the opaque, unpredictable patterns and behavior of our City's agencies described in the testimony above, even if aided by competent *Padilla* counsel, a criminal defense attorney might not be able to fulfill their constitutional duty<sup>49</sup> to properly advise a client about the enforcement consequences of a plea.

This is also why we must eliminate the list of 177 offenses in the detainer laws. Permitting the DOC and NYPD to conspire with ICE and transfer people into federal custody based on a person's criminal history or match on a government watch list is deeply misguided. This approach exacerbates the disproportionate impact of the criminal legal system, which unequally targets Black and brown people and is highly prejudicial in immigration court proceedings. While the current bills do not eliminate the list of 177 criminal convictions, we urge this Council to include amendments that would strengthen the judicial warrant requirement without the additional list of 177 offenses. As demonstrated *supra*, these offenses are often used by local law enforcement officials to wrongly initiate contact with ICE. They also result in stripping immigrant New Yorkers of critical due process protections, including access to representation in deportation cases<sup>50</sup>. The list of 177 offenses take on a life of their own when left to the discretion of local law enforcement, and ultimately communicates that New York City does not owe an equal duty of protection to all residents. That is not the case and we must end this practice.

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<sup>49</sup> *Padilla v. Kentucky*, 559 U.S. 356 (2010).

<sup>50</sup> Coltin, Jeff, "NYC Covers Immigrants Legal Cost for those without a Criminal Conviction", City and State (June 14, 2018)<https://www.cityandstateny.com/politics/2018/06/nyc-covers-immigrants-legal-costs-for-those-without-a-criminal-conviction/178375/>

## **CONCLUSION AND RECOMMENDATIONS**

We urge the New York City Council to pass Intros. 184, 185, and 158. Together, this set of bills will strengthen the City's pre-existing detainer laws and ensure city agency compliance. Intros 184 and 185 aim to close the regularly exploited loopholes detailed above and ultimately reduce the number of detainer law violations by City agencies. We specifically support amendments to Intros. 184 and 185 that eliminate the 177 offenses as a metric and instead rely on a stronger requirement for a judicial warrant so that all immigrants in NYC custody will be equally protected. We similarly urge the New York City Council to pass Intro. 158 to ensure a private right of action so people harmed by these violations have some mechanism for redress. Local law enforcement agencies' failure to comply with local law has a long-lasting impact on the lives who these agencies disregard when violating the City's detainer laws. By passing Intro. 158, this Council will take a meaningful step to prevent such future harm and instead affirm the humanity of those impacted.

**To: New York City Council Committee on Immigration**  
**From: Alejandra Melgar Chay, Paralegal; Shraddha Joshi, Paralegal, The Door's Legal Services Center**  
**Re: Oversight Hearing: Legal Services for Immigrant New Yorkers**

**Date: December 8, 2025**

The Door is a comprehensive youth development organization that has been supporting vulnerable youth in New York City since 1972. Each year, we provide services to nearly 9,000 young people between the ages of 12 and 24, many of them immigrants. These services include healthcare, education, supportive housing, food and nutrition, career development, arts and recreation, mental health counseling, and legal assistance — all under one roof. We are also a Department of Youth and Community Development (DYCD) Runaway and Homeless Youth drop-in center, providing food, clothing, showers, laundry, and case management services to young people who are unhoused or unstably housed. At The Door, we emphasize empowering and engaging the young people we serve, and we are committed to creating a safe, equitable, and inclusive space for young people and staff.

The Door's Legal Services Center is an office of over 50 individuals, including attorneys, social workers, paralegals, and support staff. In the fiscal year 2025, we handled 2,538 immigration matters for young people. Our attorneys represent youth in removal proceedings before immigration courts, as well as those seeking to regularize their status through the filing of affirmative humanitarian applications. We are also one of the primary organizations contracted to serve detained migrant youth in the New York area, and our Detained Minors Project (DMP) provides legal services to youth detained in Office of Refugee Resettlement (ORR) centers in Westchester, Brooklyn, and The Bronx. This entails providing services to detained youth, and subsequently supporting them with their legal cases if they are released in the City.

As paralegals with The Door's Detained Minor's Project, we are witnessing firsthand the ways in which Immigration and Customs Enforcement (ICE)'s escalated and extrajudicial presence in New York City impacts both our detained and released clients: separating young people from their family members, inhibiting their right to education and resource access, and creating dehumanizing conditions that lead to collective trauma and fear. We call on the City government to take immediate and urgent action to protect immigrant communities in New York, and to take specific steps to attend to the needs of immigrant youth, who are often the most vulnerable and least resourced.

## **1. New York City Has a Responsibility to Immigrants**

Immigrants coming to New York City are facing an unprecedented assault on their right to migrate and seek safety at the local, state, and national level. As violence against immigrants soars to unbelievable heights, it is important to remember that the right to migrate—regardless of whether individuals are fleeing persecution—is enshrined in international human rights law.<sup>1</sup>

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<sup>1</sup> "Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status." Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 at 71, Art. I-II (1948).

New York City has some of the most robust protections for immigrants in the country, allowing those with or without status to continue to access important social services and participate in society. In the wake of a punitively anti-immigrant federal government, it is imperative that the City continues to protect and advance the rights of immigrants.

Immigration has always been an integral part of the character of New York City, forming the basis of the vibrant and diverse communities that make New York City the social, cultural, and economic hub that it is globally recognized as today. As such, enshrining protections for immigrants is a key duty of the New York City government. Protections for immigrants are deeply embedded in the legal and cultural history of the City. In 1989, then-Mayor Ed Koch signed an executive order barring city officials from sharing information about a person's immigration status with federal immigration authorities.<sup>2</sup> This order and subsequent policies amount to New York City's "sanctuary city" designation. New York City officials— particularly from the New York City Police Department (NYPD) or the Department of Corrections (DOC) — are not required to facilitate contact between immigrants and federal agencies.<sup>3</sup>

The treatment of Immigration and Customs Enforcement (ICE) detainees is crucial to the City's sanctuary city policy. ICE detainees are requests made by ICE to city agencies to hold or detain noncitizens so that ICE may more easily take them into custody and remove them from the United States.<sup>4</sup> As agencies within a sanctuary city, the NYPD and DOC are not permitted to comply with ICE detainer requests unless ICE can produce a judicial warrant or proof that the noncitizen has been convicted of a serious crime.<sup>5</sup>

In spite of these guardrails, the recent months have revealed escalated collaboration between the NYPD and ICE. By aiding and abetting ICE raids and brutalizing community members who are providing protection to one another in the face of these violent attacks on immigrants, the NYPD is violating the city's own sanctuary principles.<sup>6</sup> For Door members in particular, these conditions make young people increasingly unsafe: during ICE's infamous raid on Canal Street in October 21, young people faced challenges accessing our facilities just two blocks away, and feared leaving to go home. ICE's violent activity makes it increasingly difficult for young people to take advantage of the resources they need.

New York's status as a sanctuary city makes *everyone* safer. Sanctuary city policies allow immigrants to more confidently engage with New York City officials without fear that doing so will bring them to the attention of the federal government. This in turn makes it substantially easier for immigrants to take actions that benefit themselves and the broader New York City community, such as seeking healthcare or reporting a crime. Additionally, crime is markedly

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<sup>2</sup> Office of Mayor Ed Koch, Exec. Order No. 124 (Aug. 7, 1989), [https://www.nyc.gov/html/records/pdf/executive\\_orders/1989EO124.PDF](https://www.nyc.gov/html/records/pdf/executive_orders/1989EO124.PDF).

<sup>3</sup> Gwynne Hogan & Rachel Holliday Smith, *What Exactly Is a Sanctuary City and What Does That Mean for NYC?*, The City (Feb. 13, 2024), <https://www.thecity.nyc/2024/02/13/sanctuary-city-explainer-nyc/>.

<sup>4</sup> U.S. Immigr. and Customs Enforcement, *Immigration Detainers* (Dec. 3, 2024), <https://www.ice.gov/immigrationdetainers>.

<sup>5</sup> *See id.*

<sup>6</sup> CBS New York Team, *Anti-ICE protesters hold another rally, accuse NYPD of violating NYC's sanctuary city laws*, CBS News (Nov. 30, 2025), <https://www.cbsnews.com/newyork/news/anti-ice-protests-new-york-city-nypd/>.

lower and labor force participation is significantly higher in sanctuary counties compared to counties without sanctuary policies.<sup>7</sup> The city must take urgent steps to ensure that its agencies are upholding values and policies that are essential for the well-being of all New Yorkers.

## **II. Immigrants Face Violence, Terror, and Uncertainty Under the Trump Administration**

### **a. *Young Recent Immigrants are Extremely Vulnerable***

Recent immigrants to New York City—especially children and young adults—are in extremely vulnerable positions. Many of them have arrived to the United States within the last few months after a long, perilous, and often traumatic journey from their countries of origin. Even before setting out on that journey, many of these young people have already experienced significant trauma in their lives. In addition to these existing challenges, immigrant young people now face even greater risk under the second Trump Administration.

At The Door, we work with many young people who entered the United States as unaccompanied children, children who are under the age of 18 and enter the country without their parent(s). Unaccompanied children are placed in the custody of the Office of Refugee Resettlement (“ORR”) in facilities located across the country. The Door is the assigned legal service provider for multiple ORR facilities in New York State. We represent both unaccompanied children who are currently detained and those who have been released from detention and live in New York City. Understandably, these children and youth are a particularly vulnerable population and face a number of challenges while detained. For example, they report poor language access within ORR custody and feelings of isolation and fear.

Many unaccompanied children in New York are pursuing applications for asylum, seeking protection from persecution in their country of origin, and Special Immigrant Juvenile Status (SIJS), which provides legal status to young people facing abuse, neglect, or abandonment from one or both of their parents. The challenges faced by young people pursuing such relief have grown significantly over the course of the last several months, as the Trump Administration has begun targeting these vulnerable youth in unprecedented ways.

A mere month after Trump’s inauguration, ICE began targeting unaccompanied children who had been released from custody for “wellness checks.” ICE agents would appear at the home of the young person and their sponsor to interrogate them about their lives and inspect the home. Both young people and non-citizen sponsors are vulnerable to arrest and detention following these visits. Since February 2025, nearly 500 children have been re-detained by ORR following a “wellness check,” sometimes as a result of the arrest and/or detention of their sponsor by ICE.<sup>8</sup> As of late November, ICE has sent over 600 children to federal detention centers this year, reaching an unprecedented record.

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<sup>7</sup> *The Effects of Sanctuary Policies on Crime and the Economy*, Ctr. for Am. Progress (Jan. 26, 2017), <https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/>.

<sup>8</sup> Kids in Need of Defense, *A Timeline: How the Second Trump Administration Is Rolling Back Protections for Unaccompanied Children*, 1, 6 (Oct. 2025), [https://supportkind.org/wp-content/uploads/2025/10/25\\_Trump-AdminRollbacks-Timeline.pdf](https://supportkind.org/wp-content/uploads/2025/10/25_Trump-AdminRollbacks-Timeline.pdf).

Moreover, beginning in March 2025, ORR instituted more onerous requirements for prospective sponsors of detained children. To be released from ORR custody, young people generally must identify an adult in the United States who can serve as their sponsor, and that sponsor must be vetted and approved by ORR. The new ORR requirements regarding sponsors mandate that sponsors claiming a biological relation to a detained child undergo DNA testing to prove that relation, and that the sponsor prove their identity and income with documents typically most available to people with immigration status. These policy shifts made it significantly more difficult for people without legal status to sponsor unaccompanied children, causing the average length of detention to skyrocket from 35 days to 171 days<sup>910</sup>

In September, the Trump Administration attempted to deport about 400 unaccompanied Guatemalan children in ORR custody, carrying out the operation with little notice during the overnight hours of a holiday weekend, many of whom were Door clients in detention in New York. The National Immigration Law Center (NILC) quickly filed for an emergency restraining order, and Judge Sooknunan in Washington, D.C., halted the deportations and ordered the return of children already en route to Guatemala. Although these youth are temporarily safe, there is grave concern the Administration may again try to rapidly and illegally deport vulnerable youth in ORR detention.<sup>11</sup>

Just weeks after the attempted removal of Guatemalan youth, the Administration launched another operation in early October, dubbed “Freaky Friday,” targeting detained youth as young as 14. ICE sent letters threatening indefinite detention and immediate transfer to ICE custody at age 18 unless children waived their Trafficking Victims Protection Reauthorization Act (TVPRA) rights and withdrew immigration applications.<sup>12</sup> The letters offered \$2,500 to return to their home countries and suggested their parents could be arrested if they did not comply.<sup>13</sup>

Despite rapid efforts by The Door and other legal providers to inform young people of their rights, there remains a substantial and immediate risk that the Administration will continue targeting this vulnerable population, coercing children into waiving rights or removing them entirely. While released youth living in NYC must navigate the risks of ICE interactions, detained youth have reported being approached by ICE officials at their detention centers,

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<sup>10</sup> *Id.*

<sup>11</sup> See Sofia Menchu, *Guatemala Prepared to Receive Deported Minors from the U.S., President Says*, Reuters (Sept. 1, 2025), <https://www.reuters.com/world/americas/guatemala-prepared-receive-deported-minors-us-presidentsays-2025-09-01/>.

<sup>12</sup> The TVPRA confers certain rights upon unaccompanied minors, including the right to have their asylum case heard by USCIS rather than EOIR. This right is significant because USCIS is generally thought to be a more favorable adjudicator than EOIR. While the asylum process in immigration court is adversarial, the process before the USCIS asylum office is not. In immigration court, a Department of Homeland Security (DHS) lawyer will be present to contest the applicant’s claim for relief, and a DHS administrative judge will decide the case following a trial, whereas before the asylum office, an asylum officer will interview the applicant to determine if they should be granted asylum without any adversary present. Whether a case is heard by USCIS or EOIR can be the deciding factor as to whether that case is granted or denied.

<sup>13</sup> See National Immigrant Justice Center, *Operation “Freaky Friday”: What You Need to Know*, (Oct. 3, 2025), <https://immigrantjustice.org/press-release/operation-freaky-friday-what-you-need-to-know/>.

demanding them to sign documents without proper information. These unprecedented attacks on immigrant youth require urgent and sustained intervention to prevent irreparable harm.

***b. Young People's Families and Communities are Vulnerable to Threats of Deportation, and Young People are Facing Challenges in Accessing their Right to Relief***

Many young immigrants, especially those detained in ORR shelters or involved in SIJS proceedings, depend on parents or guardians living in New York for financial support, guidance, emotional support, and overall well-being. Young people often make the difficult journey to the United States to reunite with family members or close family friends who can take care of them, and it is a great relief for them to be able to live safely within their communities in New York. Other young people come to the United States on their own, forming important bonds and support networks with other recent immigrants.

For young people applying for SIJS, the immigration status of a young person's mentors and adult family members is often of particular concern. In New York, the most common pathway to SIJS begins with obtaining family court orders appointing a legal guardian for the young person. An adult is legally allowed to serve as a legal guardian and support a young person's SIJS case regardless of their own immigration status. To be granted guardianship orders, the proposed guardian typically needs to attend family court and testify alongside the young person. The family court generally also requires that the proposed guardian, as well as every person over the age of 18 living in the proposed guardian's home, submit personal information so that a background check may be performed. Proposed guardians and adult household members are generally also required to be fingerprinted by the court.

Particularly in the last several months, The Door's staff have seen undocumented potential legal guardians decide to no longer move forward with the guardianship process out of concern that doing so would put them at risk of being arrested by ICE. Proposed guardians and youth alike are afraid to go to family courts because they believe that ICE may arrest them there, even though such an arrest would likely be unlawful under state and city law. Undocumented potential guardians are also especially concerned about the fingerprinting requirement. In the past, fingerprints taken by New York family courts were shared with ICE, who used the information to detain and deport immigrants without legal status.<sup>14</sup> As a result, undocumented people were all but prevented from becoming legal guardians, as the risk of detainment or deportation was far too great. This in turn made it more difficult for young people to apply for SIJS.

For minors detained in ORR centers, the immigration status of a young person's family member or close family friend receiving them is also concerning. Minors are detained in ORR facilities if they arrived to the US alone, were separated from their family members upon entry in the US, or recently arrested and were sent to ORR by law enforcement agencies. In order to be released from the detention centers, minors must identify a sponsor (usually a family member or close family friend), who can provide the young person guardianship and a place to stay. Sponsors undergo extensive documentation and background checks, including fingerprinting and home visits. For sponsors who are undocumented, this can significantly raise their risk of being

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<sup>14</sup> See *Secure Communities*, Immigr. and Customs Enforcement (May 10, 2024), <https://www.ice.gov/securecommunities>.

detained by ICE. With the implementation of the regulation, unaccompanied children who would have previously been released to their parents or close relatives are languishing in ORR custody. Family members are not willing to come forward as potential sponsors for fear that their information will be shared with immigration officials. Family members who are willing to come forward are being disqualified as potential sponsors solely because of their immigration status. Without a qualifying potential sponsor, unaccompanied children cannot be promptly released to the least restrictive setting.

Last month, a parent of client of The Door was detained by ICE and deported after attending his ID verification appointment. This is often a mandatory step in the reunification process. If the sponsor refuses to attend the verification appointment, there could be repercussions for the minor. Other minors in the shelters who have heard about situations like this happening are then forced to choose between leaving the shelter and potentially putting their sponsors at risk or remaining in detention.

Since the sharp increase in this Administration's increased restrictions, surveillance, and enforcement against sponsors, including this Rule, we have observed that children previously in the process of being released to parents, siblings, or immediate relatives (ORR Categories 1 and 2) have increasingly converted to Categories 3 and 4 (distant relative/unrelated adult/no sponsor identified). The overall number of youth in our shelters either pursuing sponsorship from a previously unknown adult or waiting in custody with no sponsor at all has sharply increased. This month, over 50% of the young people in our serviced ORR shelters were either Category 3 or 4, up from 34% in January 2025. In our communications with our ORR shelter partners, case managers already report increased lengths of stay for youth in their custody, specifically due to heightened restrictions around sponsorship eligibility and sponsors' fear of immigration enforcement. ORR's own data reveals that length of stay for unaccompanied minors eventually discharged from custody went from 37 days in January 2025 to 217 days in April—a 587% increase.<sup>15</sup> Between March and April alone, the average length of stay increased 105 days.<sup>16</sup>

Newly arrived young people in New York have very limited community networks and may know only one or two trusted adults who could serve as guardians. When those adults are undocumented and feel unsafe entering family court, the youth may be left without anyone able to act as their guardian—denying them both needed support and the chance to pursue their legal right to SIJS. To allow undocumented individuals to support young people by becoming guardians, and to protect the right of youth to pursue immigration relief, the City must continue to adopt policies that prevent family courts from sharing information with the federal government. Information shared with New York City family courts must remain confidential and inaccessible to immigration officials.

In addition to the challenges posed to young people applying to SIJS and detained clients pursuing sponsorship, our clients have also had to navigate ongoing threats associated with the

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<sup>15</sup> See “Unaccompanied Alien Children: Facts and Data,” Office of Refugee Resettlement, Administration for Children and Families, U.S. Department of Health and Human Services, current as of May 12, 2025, [https://acf.gov/orr/about/ucs/facts-and-data#book\\_content\\_2](https://acf.gov/orr/about/ucs/facts-and-data#book_content_2) (see “Average Monthly Data”).

<sup>16</sup> *Id.*

asylum system. On April 11, 2025, EOIR issued a Policy Memorandum, encouraging immigration judges to “pretermi” asylum applications in immigration court.<sup>17</sup> “Pretermi” refers to the dismissal of an asylum claim without a full merits hearing. It can occur if the application is deemed legally insufficient – for example, because it is incomplete, or because the application does not meet the minimum legal requirements of a claim for asylum. As a result, an asylum seeker whose application is pretermi will be left without an application for relief and stands at great risk of being ordered removed from the United States, making them further vulnerable to detention by ICE. For young people with pending asylum applications, the uncertainty and constant changes associated with the asylum process can create conditions of distress, as they are increasingly vulnerable to threats from ICE, and face systemic roadblocks in advancing their applications for relief.

A young person’s family members and friends should not be put at risk because the young person is pursuing legal immigration relief. Similarly, a young person’s opportunity to pursue immigration relief should not be jeopardized by the requirements of the very proceedings that would result in relief. Door clients have reported parents seeking emergency guardianship and contingency plans in the event that they are detained by ICE or deported. The City must take immediate action to prevent the separation of families, and conditions that ultimately put young immigrants at the greatest risk of harm.

***c. Immigrants are Being Brutalized and Kidnapped by ICE Within Our City, Including at New York Immigration Courts***

The U.S. immigration system relies on a system of more than 70 immigration courts to process immigration applications, hear asylum cases, and otherwise make decisions regarding the immigration status of approximately 3.5 million noncitizens across the country.<sup>18</sup> About 325,000 of those cases are heard in New York City.<sup>19</sup> For noncitizens with cases in immigration court or required check-ins with ICE, attendance is mandatory. A noncitizen who misses a hearing faces an extremely high risk of being ordered removed *in absentia* by the immigration judge – without an opportunity to defend themselves or present their claim for relief to a judge. Likewise, a noncitizen who misses an ICE check-in faces a high risk of being detained upon any future contact with ICE. Moreover, noncitizens who have cases in immigration court must pursue many key forms of immigration relief, like asylum, before the court. If their immigration court case is dismissed, any claims for relief pending before the court will likewise be dismissed.

In recognition of the vital role that immigration courts play in the modern U.S. immigration system, ICE has historically been mostly prohibited from conducting enforcement actions (in other words, making arrests) at immigration courts.<sup>20</sup> But in May 2025, ICE not only began

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<sup>17</sup> Sirce E. Owen, Acting Director of EOIR, *Pretermi of Legally Insufficient Applications for Asylum*, PM 25-28 (Apr. 11, 2025), <https://www.justice.gov/eoir/media/1396411/dl?inline>.

<sup>18</sup> See Exec. Off. of Immigr. Review, *Immigration Court Practice Manual*, Ch. 1.5 (last visited Oct. 23, 2025), <https://www.justice.gov/eoir/reference-materials/ic/chapter-1/>; TRAC Immigration, *Immigration Court Backlog: All-2025* (last visited Oct. 23, 2025), <https://tracreports.org/phptools/immigration/backlog/> (click “All-2025”).

<sup>19</sup> TRAC Immigration, *Immigration Court Backlog: New York* (last visited Oct. 23, 2025), <https://tracreports.org/phptools/immigration/backlog/> (click “New York”).

<sup>20</sup> See Memorandum from Tae Johnson, Acting ICE Dir., & Troy Miller, Acting CBP Comm’r, *Civil Immigration Enforcement Actions in or near Courthouses*, (Apr. 27, 2021),

enforcement actions at immigration court – they began indiscriminately and violently arresting and detaining hundreds of noncitizens each week at required, routine immigration court appearances and ICE check-ins.<sup>21</sup> On June 4th alone, ICE officers arrested 118 people in New York.<sup>22</sup> Now, ICE officers and arrests are commonplace in New York immigration courts. Masked and armed officers line court hallways, some in plainclothes, others wearing tactical gear. They pounce on noncitizens exiting courtrooms to interrogate them on their identities. When they decide to arrest someone – without a judicial warrant or any clear reason for the arrest – they do so violently, shoving immigrants against walls or to the floor, regardless of whether they resist their unlawful arrest.<sup>23</sup>

Although immigration courts are expressly authorized by federal regulations to hold proceedings via video conference,<sup>24</sup> which would both keep immigrants safe from courthouse arrest and reduce disorganization and chaos at court, many immigration judges deny motions for a video appearance as a matter of course. Requiring immigrants to instead attend court in person gravely undermines the due process rights of immigrants and the integrity of immigration courts and threatens the safety and wellbeing of the 3.5 million people who must attend court appearances each year.<sup>25</sup>

#### d. *Impact of Courthouse Arrests on Immigrant Youth*

<https://www.cbp.gov/sites/default/files/assets/documents/2021-Apr/Enforcement-Actions-in-Courthouses-04-26-21.pdf>. Although enforcement actions at ICE check-ins were not largely prohibited in the same way, they were nonetheless uncommon and generally limited to those with criminal history.

<sup>21</sup> See Hayley Miller, ICE Arrests at NYC Immigration Court Offer Harrowing Snapshots of Trump's Crackdown, MSNBC (July 30, 2025), <https://www.msnbc.com/top-stories/latest/26-federal-plaza-ice-arrests-immigrants-trump-jacob-soboroff-rcna221970>; Haidee Chu & Gwynne Hogan, ICE Immigration Arrests Just Shot Through the Roof, New Data Shows, The City, (July 16, 2025), <https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/>; Barbara Russo-Lennon & Lloyd Mitchell, ICE in Courts: More Immigrants Cuffed at Federal Plaza as Even Officers Feel the Strain, amNY (July 17, 2025), <https://www.amny.com/policefire/ice-immigrants-arrested-federal-plaza-07172025/>; Dean Moses, Gone in 30 Seconds: Frantic Scenes in Lower Manhattan as ICE Agents Apprehend Immigrants Attending Court Hearings, amNY (June 10, 2025), <https://www.amny.com/new-york/ice-agents-lower-manhattan-court-immigrants-06102025/>; Noorula in Khawaja, Immigrants' Courthouse Arrests in NYC Prompt Fear and Calls for Investigation, NY1 (June 6, 2025), <https://ny1.com/nyc/all-boroughs/news/2025/06/06/immigrants-courthouse-arrests-in-nyc-spur-fear-calls-for-investigation>; Ximena Bustillo, ICE's Novel Strategy Allows for More Arrests from Inside Immigration Courts, Nat'l Public Radio (June 12, 2025), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; Andrew Rice & Paula Aceves, Portfolio: The Trap at 26 Federal Plaza, N.Y. Magazine (Oct. 20, 2025), <https://nymag.com/intelligencer/article/26-federal-plaza-nyc-immigration-court-ice-agents-detainments-deportations.html>.

<sup>22</sup> Hayley Miller, ICE Arrests at NYC Immigration Court Offer Harrowing Snapshots of Trump's Crackdown, MSNBC (July 30, 2025), <https://www.msnbc.com/top-stories/latest/26-federal-plaza-ice-arrests-immigrants-trump-jacob-soboroff-rcna221970>.

<sup>23</sup> There are many reports of aggressive interactions between agents and immigrants, including reports of agents “body tackling people to the floor” and “slam[ming] people against walls [and] doors.” Noorula in Khawaja, *Immigrants' Courthouse Arrests in NYC Prompt Fear and Calls for Investigation*, NY1 (June 6, 2025), <https://ny1.com/nyc/all-boroughs/news/2025/06/06/immigrants-courthouse-arrests-in-nyc-spur-fear-calls-for-investigation>.

<sup>24</sup> See 8 C.F.R. § 1003.25(c) (“An Immigration Judge may conduct hearings through video conference to the same extent as he or she may conduct hearings in person”); Memorandum from James R. McHenry III, EOIR Dir., PM 21-03, Immigration Court Hearings Conducted by Telephone and Video Conferencing, at 3 (Nov. 6, 2020).

<sup>25</sup> See Exec. Off. of Immigr. Review, *Immigration Court Practice Manual*, Ch. 1.5 (last visited Oct. 23, 2025), <https://www.justice.gov/eoir/reference-materials/ic/chapter-1/5>; TRAC Immigration, *Immigration Court Backlog: All-2025* (last visited Oct. 23, 2025), <https://tracreports.org/phptools/immigration/backlog/> (click “All-2025”).

Immigrants are terrified to attend immigration court or ICE check-ins in person. Door staff have spoken to hundreds of young immigrants who report being unable to sleep, eat, or focus on their lives because they are so afraid of being arrested while attending a routine and mandatory immigration court appearance or ICE check-in.<sup>26</sup> They are acutely aware of the risks that they face merely by following the law. Door members have shared stories of friends leaving for court and not returning, and of classmates missing from school. These young immigrants want nothing more than to participate fully in their hearings and pursue the relief to which they are entitled. With such a substantial ICE presence in immigration courts, however, immigrants forced to attend court in person cannot participate in hearings or pursue relief without risking violent arrest and detention.

Multiple members of The Door have been violently arrested at immigration court and at ICE check-ins. One such person is “Mohammad,” who entered the United States alone when he was 18 years old to seek asylum. He filed a timely *pro se* asylum application with the court as well as a *pro se* SIJS application with USCIS. He appeared at his Master Calendar Hearing in June via Webex with the private immigration attorney he hired to represent him in removal proceedings. However, the Immigration Judge presiding over his case ordered him to appear in person, which Mohammad complied with. The government moved to dismiss Mohammad’s asylum claim and immigration court case, and the Immigration Judge dismissed the case over Mohammad’s objection. Mohammad was immediately arrested by ICE at 290 Broadway. He was transferred to 26 Federal Plaza, then Nassau County Correctional Facility, and finally to the Metropolitan Detention Center (MDC) in Brooklyn, New York, where he was held until November, when he was ordered released by a judge.

Another Door member, Mouctar, was also arrested at immigration court following a routine hearing in August 2025. Following his arrest and detention, he was quickly moved away from his New York community to a detention center in central Pennsylvania. His request to be released on bond was denied. Though he has now applied for SIJS based on the death of his father and abandonment and neglect by his mother, he remained detained without any until late November. He was since granted asylum and subsequently released from detention, but his period under ICE custody was one of significant distress and trauma. Prior to being arrested, Mouctar was enrolled in high school in Brooklyn, where he excelled in his courses and was a valued member of his school community. His teachers and classmates and other members of the community made every effort to support Mouctar while he was detained.

In October, a 16-year-old Door member, Joel Camas, was arrested at a routine ICE check-in. Mere weeks earlier, his mother had made the extremely difficult decision to self-deport to try to protect Joel. Even despite his mother’s sacrifice, and despite the fact that Joel has approved SIJS, ICE chose to rip Joel away from his community by arresting and detaining him. Prior to being arrested, Joel was enrolled in high school in the Bronx. He was described by teachers as “a committed and responsible student.” He was at imminent risk of removal to a country where he

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<sup>26</sup> See Ana Ley, *Schools Try to Shield Immigrant Children From Deportation. It’s Not Enough.*, The New York Times (Oct. 11, 2025), <https://www.nytimes.com/2025/10/11/nyregion/schools-immigrant-children-deportation.html>.

would be at risk of suffering severe financial hardship and gang violence until a Federal Court Judge issued a temporary restraining order preventing his removal pending the adjudication of his habeas petition, which was granted in November.<sup>27</sup> Joel has since been released and is back in school, but many other young people have not been able to access the same resources and support as they navigate the process of obtaining legal relief.

Because of the sheer volume of ICE arrests and how difficult it is for detainees to communicate with the outside world, it is likely that even more Door members have been arrested and detained by ICE in recent months.

***e. Expansion of Immigration Detention and Its Impact on Detainees***

As the experiences of Mohammad, Mouctar, and Joel demonstrate, ICE arrests and detentions are devastating for both the impacted individual and their communities. Immigrants in immigration detention have limited access to their support sources, including to legal assistance. It is much more difficult to gather evidence, prepare for a hearing, and otherwise pursue immigration relief from detention. And of course, the experience of being detained in and of itself is devastating, particularly given the inhumane conditions reported by those in immigration detention. For example, detainees in Newark have reported not being given necessary medication and not receiving any meals between 6AM and 10PM.<sup>28</sup> Other detainees have reported similarly inhumane conditions, including being held at the 26 Federal Plaza immigration court for prolonged periods of time, where dozens of detainees were kept in bathrooms and other non-residential spaces, deprived of food, beds, and medicine.<sup>29</sup>

In addition to arresting and detaining more immigrants, the Trump Administration has also broadened the scope of mandatory detention policies and stripped crucial and longstanding legal protections from detainees. Just days after taking office, Trump signed the Laken Riley Act (“Laken Riley”) into law. Under Laken Riley, immigrants who are deemed inadmissible under certain sections of the Immigration and Nationality Act (“INA”) and who are merely charged with or arrested for a number of offenses, including nonviolent offenses,<sup>30</sup> are subject to mandatory detention and are no longer eligible for a bond hearing.<sup>31</sup>

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<sup>27</sup> See Ana Ley, *A Woman Self-Deported, Hoping to Shield Her Son. He Was Detained Anyway.*, The New York Times (Oct. 24, 2025), <https://www.nytimes.com/2025/10/24/nyregion/teenager-detained-mother-self-deported.html>.

<sup>28</sup> Ricardo Kaulessar, *Before Recent Delaney Hall Uprising, Detainees Frequently Complained About Conditions*, North Jersey (June 18, 2025), <https://www.northjersey.com/story/news/2025/06/18/delaney-hall-history-conditionsnewark-nj-ice-facility/84149059007/>.

<sup>29</sup> See Gwynne Hogan & Haidee Chu, *'Like Dogs in Here' - Videos Expose ICE Lockup Inside 26 Federal Plaza*, The City (July 22, 2025), <https://www.thecity.nyc/2025/07/22/video-26-federal-plaza-immigration-ice-dhs-cells/>; see also Paul Moses & Tim Healy, *Inside the Manhattan Court Where ICE Fights to Keep Immigrants Locked Up*, The City (July 28, 2025), <https://www.thecity.nyc/2025/07/28/ice-detention-court-varick-street/>.

<sup>30</sup> The Laken Riley offenses are burglary, theft, larceny, shoplifting, or assault on a law enforcement officer, or any crime resulting in death or serious bodily injury.

<sup>31</sup> Laken Riley Act, Pub. L. 119-1, 139 Stat. 3; see Nat'l Immigr. Project, Practice Advisory: The Laken Riley Act's Mandatory Detention Provisions (Feb. 5, 2025), <https://nipnl.org/sites/default/files/2025-02/Alert-Laken-RileyAct.pdf>.

In May 2025, the Board of Immigration Appeals (BIA) decided *Matter of Q. Li*, which further expanded mandatory detention. Under *Q. Li*, noncitizens who entered the United States without inspection before being apprehended by immigration authorities and placed into removal proceedings under INA § 240 are subject to mandatory detention – even if the noncitizen had been previously released from detention and is re-detained by ICE years later.<sup>32</sup> Finally, in September 2025, the BIA decided *Matter of Yajure Hurtado*, which again broadened the scope of mandatory detention. Under *Yajure Hurtado*, any noncitizen who entered without inspection may be ineligible for bond and thus subject to mandatory detention.<sup>33</sup> Noncitizens who were paroled into the country at a port of entry may also be ineligible for bond under *Yajure Hurtado*.<sup>34</sup> However, many district courts have disagreed with the result of *Yajure Hurtado*,<sup>35</sup> and further challenges to its validity are anticipated.

As a result of these legal changes, millions of immigrants are now at risk of indefinite immigration detention, where they will face greater difficulties accessing crucial support systems and fighting their legal case, and will likely experience inhumane conditions of confinement. Immigrants who are detained require competent, fast-acting legal support to avoid prolonged detention and/or removal from the United States. Specifically, detained immigrants need support from competent federal litigators who can file *habeas* petitions to see a detainee's release from immigration detention. Legal services organizations thus require funding to build capacity for federal litigation by hiring experienced federal litigators and training existing staff on *habeas* litigation. Without such support, it is all but impossible for detainees to secure their own release from detention and reunification with their communities.

### **III. The City Must Address the Multiple and Intersecting Needs of Immigrants to Ensure that Our Community Members are Protected and Respected**

#### ***a. Immigrants Living in Shelter Need Increased Protections***

Recent immigrants are not only vulnerable due to their life experiences prior to arriving in the United States, but also due to their living situations here in New York. Many recent immigrants arrive in New York without a safe or stable place to live. As a result, they – like so many other members of our community – turn to the City's shelter system for support. While the City has largely closed shelters meant exclusively for recently arrived immigrants (Humanitarian Emergency Response and Relief Centers (HERRCs)), many recent immigrants have been

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<sup>32</sup> See *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025).

<sup>33</sup> See *Matter of Yajure Hurtado*, 29 I & N Dec. 216 (BIA 2025); see also Jennifer Whitlock, *Rapid Response Update on Bond Eligibility for Undocumented Immigrants* (Sept. 12, 2025), <https://www.nilc.org/resources/rapidresponse-update-on-bond-eligibility-for-undocumented-immigrants/>.

<sup>34</sup> See *Matter of Yajure Hurtado*, 29 I & N Dec. 216 (BIA 2025); see also Jennifer Whitlock, *Rapid Response Update on Bond Eligibility for Undocumented Immigrants* (Sept. 12, 2025), <https://www.nilc.org/resources/rapidresponse-update-on-bond-eligibility-for-undocumented-immigrants/>.

<sup>35</sup> Thought the full list of such cases is too lengthy to provide in full, representative New York cases include *J.U. v. Maldonado*, No. 25-CV-04836 (OEM), 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025); *Savane v. Francis*, — F. Supp. 3d —, No. 1:25-CV-6666-GHW, 2025 WL 2774452 (S.D.N.Y. Sept. 28, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); and *Lopez Benitez v. Francis*, — F. Supp. 3d —, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025).

absorbed into the Department of Homeless Services shelter system, or reside at Bruckner, a shelter for new New Yorkers in the Bronx.

Therefore, it is critical that the City take immediate steps to prevent ICE from threatening the tens of thousands of recent immigrants who live within the shelter system. For one, the City must develop policies and trainings to ensure that ICE does not access City shelters. The City must also take all possible measures to prevent ICE officers from surveilling shelter from offsite. The City must pay particular attention to the Bruckner shelter, as it is an alarmingly vulnerable target for ICE raids, housing a large number of people who are unlikely to have legal status. Therefore, the City must ensure that Bruckner residents remain safe and out of ICE's reach.

Further, the City must ensure that immigrants' data and personal information is kept confidential and inaccessible to the federal government. Although sanctuary policies currently prevent ICE from accessing information about people in shelters without a judicial warrant, shelter locations are public, and the City maintains personal information about those who are placed in shelters. It is thus imperative that the City take immediate steps to secure immigrants' data and affirm its refusal to share such data with ICE.

Immigrants living in shelters are more than aware of the threat that ICE poses to their safety. Door members have recently expressed fears that they will be subject to ICE raids at their shelters and some have even sought advice about leaving the shelter in favor of sleeping on the streets out of concern that remaining in shelter will lead to detention and deportation. It is entirely unacceptable that immigrants are suffering such emotional turbulence and trauma. It is within the City's power to take steps that meaningfully alleviate these emotional hardships, and it is imperative that the City do so.

***b. Young Immigrants Need Increased Protections in Order to Attend School***

In addition to safe access to shelters, young immigrants depend on safe access to New York City schools. Undocumented young people have a right to attend public school and are not required to provide documents related to immigration status to enroll.<sup>36</sup> In cases where young people are seeking Special Immigrant Juvenile Status (SIJS) as a pathway to achieving legal status in the United States, lack of school enrollment can present a barrier to receiving SIJS, making it extremely important that immigrant youth have safe access to education.

Even so, members of The Door have expressed fear about attending school during the current administration. One client, who immigrated to New York during the first Trump Administration to join her mother, expressed that she was afraid to leave the house for weeks after her mother missed an immigration court hearing. Although the client's case was separate from her mother's, she was afraid that she would be picked up by ICE while at school, and that her mother would consequently be detected and detained by ICE. Other Door members have expressed fears that ICE will locate them at school and then attempt to remove them from the country. For a young person, such anxiety and detachment from formative educational activities can be detrimental,

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<sup>36</sup> *School Eligibility*, The City of New York (last visited Jan. 15, 2024), <https://portal311.nyc.gov/article/?kanumber=KA-02974>.

especially considering how many young people have already had interrupted formal education due to extenuating circumstances in their countries of origin.<sup>37</sup>

Many members of The Door have at some point been taken out of school to work, even as children, or have missed school due to poverty, distance, or fear of violence. For example, one father of a member of The Door often forced him to miss school in order to work in his country of origin and then confiscated the money he earned at work. Living in New York City with his aunt and uncle, this same young person was able to graduate high school last year. Another member of The Door missed a month of school in his home country after his younger brother was killed by police during a political demonstration, for fear that he would be a target if he left his house. Yet another member of The Door was unable to attend school for years as a result of poor financial conditions after both of his parents died.

In addition to disruption to education in countries of origin, young people are often exposed to difficult and traumatic conditions on their journeys to the United States. The right to an uninterrupted education is one that the City must ensure for young people, especially as many have been deprived of this right prior to their arrival in the city. Young people must feel safe and empowered to learn without fear of putting themselves or their loved ones at risk of detention or deportation.

We urge the city government to circulate information that dispels fears around schools and assures new New Yorkers that schools will continue to be safe places where young New Yorkers can learn and engage in City life without fear that they or their communities will be put at risk. It is also necessary that the City affirms these promises by enacting policies that affirm that ICE will not be allowed in and/or around our schools. New York City must remain a safe place for students regardless of immigration status.

#### **IV. Vulnerable Young People are Endangered by Immigration-Related Mis- and Dis-Information**

In light of fears associated with ICE raids and presence that harm immigrant community members' sense of safety at protected locations such as shelters, schools, and public places. The city government also has a responsibility to provide accurate, accessible information to young people so that they may engage in city life with relative peace of mind. This includes providing continued funding to legal services organizations and immigrant rights organizations so that they have capacity to provide legal information and know-your-rights trainings to immigrant communities. Further, the City Council should proactively dispel misinformation about immigrants and immigration on their websites and on social media platforms.

##### ***a. Immigration to New York City is Mischaracterized to the Public***

A lack of clear and accessible information describing what it means for New York to be a "sanctuary city" and intentional mis- and disinformation about immigrants, spread by both the

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<sup>37</sup> See Ana Ley, *Schools Try to Shield Immigrant Children From Deportation. It's Not Enough.*, The New York Times (Oct. 11, 2025), <https://www.nytimes.com/2025/10/11/nyregion/schools-immigrant-children-deportation.html>.

media and the public, produces an environment in which citizens and immigrants alike are unclear on what protections exist for new New Yorkers. This misinformation makes it difficult for new New Yorkers to safely and confidently access the benefits that do indeed exist for them, including those to which they are legally entitled.

Last month, a member of The Door with a pending SIJS application mentioned that a therapist at the long-term ORR facility he is staying in told him that his name was on a removal list, and that he should avoid going out or leaving his group home for fear of deportation. The young person alerted his legal team at The Door, who revealed that this was indeed misinformation, stemming from a lack of understanding of his immigration case. Such misinformation, even if unintentional, can create a sense of fear that impedes young immigrants' ability to thrive and access their rights.

As a sanctuary city, New York City allows all individuals without regard to their immigration status to access important, basic, necessary services like healthcare, shelters, education, and access to food. The law has made it clear that everyone, *regardless of immigration status*, is entitled to basic human rights and necessities like food and shelter. The City bears the responsibility of making this information clear and accessible, and of effectively training staff members and public personnel to avoid the spread of misinformation that can further community panic.

**b. *Immigrants Often Lack Access to Critical Information due to Language and Literacy Barriers***

On top of xenophobic mis- and disinformation, a lack of widely available, detailed, accurate information in the many languages spoken by new immigrants makes it difficult for them to be empowered in their knowledge of their rights. Such lack of information creates disproportionate fear around possible encounters with ICE and other law enforcement agencies, which makes it difficult for recent immigrants to safely go about their lives and access the services and spaces that they are legally allowed to access. It also creates fear about going to important appointments such as immigration court dates or ICE check ins, where a missed appointment could also mean a deportation order *in absentia*.

While there are many know-your-rights materials available to immigrants, these materials must be tailored to a non-legal audience to truly permit youth to understand their cases and advocate for themselves. This is of particular concern for the very many youth who have experienced interruptions to their formal education and may have more limited literacy levels. Thus, it is imperative that the City actively supports the creation of quality know-your-rights materials in a variety of languages and formats, including formats accessible to those with low literacy levels and/or with disabilities.

Without quality information available from trusted sources, Door members have reported turning to informal networks to learn the state of immigration policy. For instance, Door members report joining large WhatsApp group chats with names like "asylum" or "immigration," where other recent immigrants from similar backgrounds share advice or watching TikTok videos (usually from non-lawyers) about immigration law. While that advice is almost always well-meaning, it is

too often misinformed. For example, Door members have reported being warned via WhatsApp about ICE raids at school and have consequently developed fears around going to school. If these individuals were instead provided with timely, accurate, and comprehensible information in their native languages, they would not be forced to rely on informal means to learn crucial information.

Furthermore, for detained youth, legal service providers such as The Door provide crucial information about their rights with ICE and immigration court. The conditions of detention are unique as clients in ORR facilities do not have access to external legal resources and remain vulnerable to decisions taken by ICE without broader community support. A former client of The Door who was aging out of the ORR system (upon turning 18) reported significant challenges in detention, as staff members did not speak his language, and his legal support team at The Door had to provide him necessary resources about navigating possible ICE interactions. In order to protect detained youth, the City must continue to empower legal service organizations that are conducting crucial work for those who are isolated from their communities. The City has a responsibility to ensure that such quality information is in fact provided to immigrants and made widely available to all New Yorkers.

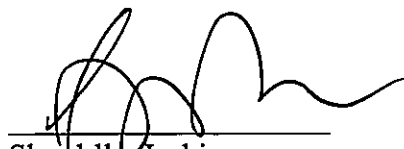
## **V. Conclusion**

As a sanctuary city, New York has a proud legacy of protecting its immigrant population, ensuring that they have access to critical services and the opportunity to thrive. However, this legacy is under attack, and vulnerable young people are bearing the brunt of these challenges. The NYC government bears the responsibility to affirm the values of the city, protecting New Yorkers from ICE's extrajudicial overreach, holding the NYPD accountable for its role in abetting ICE's actions, and empowering organizations that provide crucial resources to immigrants. We urge the City Council to take decisive action to reaffirm and strengthen New York City's sanctuary policies in order to protect immigrant youth from harmful displacement and systemic barriers, and prioritize accurate, accessible information for all immigrants. By doing so, the City can continue to uphold its values of inclusion, equity, and humanity, ensuring that immigrant youth can build secure, fulfilling lives while contributing to the vibrant fabric of New York City.

Thank you.



Alejandra Melgar Chay  
Paralegal  
The Door's Legal Services Center



Shraddha Joshi  
Paralegal

The Door's Legal Services Center



**Testimonial for the New York City Council Committee on Immigration**  
**Hon. Alexis Aviles, Chair**  
**December 8, 2025**

Thank you to Chair Aviles and the City Council for your support for immigrants across New York City. I'm writing to support the **Intro 214- The NYC Trust Act ; Intro. 1268- Immigrant Rights Signage & Due Process Transparency; Intro 1412- ICE Ban on Rikers Island and Intro 1272 - Prohibition on use of E-Verify**

My name is the Rev. Dr. Chloe Breyer and I am Executive Director at The Interfaith Center of New York. Over the course of 28 years, the **Interfaith Center of New York (ICNY)** has built one of the most religiously diverse and civically engaged network of grassroots and immigrant religious leaders and their organizations across all five boroughs. Our city's civil society is stronger thanks to the many faith leaders who have attended our social justice conferences, participated in our religious diversity education programs, or joined our advocacy work on immigration and religious freedom. I speak also on behalf of the Episcopal Diocese of New York, in which I serve as clergy on the staff of St. Edward the Martyr in East Harlem.

When immigrants and asylum seekers started arriving at Port Authority in 2022, ICNY launched our Equipping Houses of Worship coalition to support grassroots and faith leaders who were on the ground welcoming the newest New Yorkers arriving by bus. Since then, ICNY administered over a half a million dollars through 30 re-grants to trusted Faith and Community based organizations to serve immigrant New Yorkers with culturally sensitive and essential social services. As faith communities, our commitment to our neighbors extends to every aspect of their well-being and safety. We are being called upon to walk with one another in ways we had never foreseen. The Episcopal Diocese of New York joins the Interfaith Center in asking for this council's help in meeting this moment.

Since Donald Trump came into office in January the resources that our grassroots coalition spent on welcoming new New Yorkers in 2023 and 2024 are now being spent on stopping those same families and friends from being deported. Their many gains and hard-earned stability have been upended. The monthly respite meals by East End Temple and Middle Collegiate Church for families of immigrant students attending a nearby school, are now making sure families have resources to send their children to school safely. One parish in the Episcopal Diocese of New York works with public school teachers who are paying, out of their own pockets, for private transport to and from school for students who are otherwise too terrified to attend. Asylum Support Clinics in churches, like El Barrio Angels that once processed asylum cases are also now overrun with requests for Habeas Petitions, bond

funds, and commissary requests so that New Yorkers languishing in private detention centers around the country can communicate with their families and lawyers.

As ICE agents separate our families, tearing parents away from their children outside courtrooms—mocking justice in the very hallways and sidewalks of buildings where that sacred work is supposed to happen—we are in the moment where our sanctuary status as a city is being tested as never before. Clergy provide pastoral comfort and accompaniment to persons too frightened to attend court because of the intimidating presence there of ICE agents who seemingly seize people without rhyme or reason. With almost daily assaults on our neighbors across the 5 boroughs, New Yorkers must have the confidence that the NYPD and city agencies will continue to protect their rights, specifically, as that relates to not turning over information to Federal agencies like ICE with the exception for serious crimes. All of these laws we are discussing today offer ways to protect the basic freedoms and rights of individuals who are currently being targeted by federal authorities like ICE.

In conclusion, the Interfaith Center of New York stand behind **Int. 214- The NYC Trust Act** that creates a private right of action so people held by the NYPD, Dept. of Corrections and the Dept. of Probation can sue in court, giving a pathway of enforcement to protections that have been ignored. Making rights real requires providing a mechanism for enforcement, and the NYC Trust Act will achieve that.

We also support **Int. 1268- Immigrant Rights Signage & Due Process Transparency** that requires clear, multilingual signage informing New Yorkers of their constitutional rights during ICE encounters and helps control federal access to City buildings. We have seen repeatedly how “knowing your rights” can preserve safety and deflect overly aggressive civil law enforcement. Standing behind this fundamental tool of knowledge shows that New York City stands with its citizens.

Finally, we support **1412- ICE Ban on Rikers Island** that prohibits ICE operations on Rikers and updates city law to reflect modern definitions of immigration enforcement, ensuring federal agents cannot use local jails as shortcuts for unconstitutional detentions and **Intro 1272 - Prohibition on use of E-Verify.**

On a personal note, I can remember back in 2018 when Ravi Ragbir was driven by an ambulance from 26 Federal Plaza and the medical personnel inside the vehicle were told by ICE which hospital to take him to. At that time, and in response, the De Blasio administration strengthened administrative rules to increase NYPD noncooperation with ICE. It is time for us to do so again now and pass these bills.

Thank you for your attention and consideration,

A handwritten signature in black ink, appearing to read "Chloe Breyer". The signature is fluid and cursive, with the first name "Chloe" written in a larger, more prominent script than the last name "Breyer".

The Rev. Dr. Chloe Breyer  
Executive Director,  
The Interfaith Center of New York 917-420-1214

**TESTIMONY BEFORE NEW YORK CITY COUNCIL'S  
COMMITTEE ON IMMIGRATION**

**Submitted on December 11, 2025**

My name is Deborah Lee, and I am the Attorney-in-Charge of the Immigration Law Unit at The Legal Aid Society (LAS). Thank you for the opportunity to submit testimony. Legal Aid is grateful for City Council's steadfast support of programs like the New York Immigrant Family Unity Project that recognize that noncitizens are the foundation and fabric of New York City, and that we are lesser when noncitizens' rights are threatened.

LAS is built on one simple but powerful belief: that no New Yorker should be denied the right to equal justice. We want to remain a beacon of hope for New Yorkers who feel neglected, regardless of who they are, where they come from, or how they identify. From our start nearly 150 years ago, our growth has mirrored that of the city we serve. Today, we are proud to be one of the largest and most influential social justice law firms in New York City and nation-wide. Our staff deliver justice in every borough, working tirelessly to defend our clients and dismantle the hidden, systemic barriers that can prevent them from thriving. As passionate advocates for individuals and families, LAS is an indispensable component of the legal, social, and economic fabric of our City.

In the past year, LAS served over 480,000 individuals and their families who benefitted from our holistic direct services through our Civil, Criminal, and Juvenile Rights Practices. Our work across these Practices together provides us with unique insights into the challenges facing marginalized communities in NYC and an unparalleled ability to effect change on a greater scale. Our Civil Practice works with low-income New Yorkers experiencing a broad range of civil legal issues that, without assistance, can escalate into situations with cascading effects that threaten their stability and keep families locked in cycles of poverty. Our specialized units cover the full spectrum of civil legal needs, including housing and homelessness; homeowner stabilization, family law and domestic violence; immigration; special education; health; community development; consumer issues; employment; government benefits and disability; taxes; and holistic services for vulnerable populations including the

elderly, adults and children with disabilities, and people living with HIV/AIDS.

For almost 40 years, LAS has maintained a citywide Immigration Law Unit (ILU) within the Civil Practice. ILU, now comprised of nearly 100 staff, is a recognized leader in the delivery of free, comprehensive, and high caliber immigration legal services to low-income immigrants in New York City and surrounding counties. Staff represent immigrants before U.S. Citizenship and Immigration Services (USCIS), in Immigration Court removal proceedings before the Executive Office for Immigration Review (EOIR), on appeals to the Board of Immigration Appeals (BIA), and in federal court on habeas corpus petitions and petitions for review. In addition to representing clients, staff conduct outreach clinics at community-based organizations throughout New York City, intake clients at immigration detention centers, and conduct trainings in various venues throughout the city. Over the most recent fiscal year, ILU assisted in nearly 8,600 individual legal matters benefiting over 22,000 New Yorkers citywide. In addition to providing direct legal services, ILU staff provide regular training to immigrant-serving advocates from community-based organizations, State and local agencies, and judicial and legislative staff. Partnerships with other non-profit organizations and coordination of a successful pro bono program with 53 participating law firms enable the ILU to maximize resources to meet the increasing demand for representation.

As our LAS' staff are on the front lines of the efforts to challenge the Trump Administration's assault on immigrant communities and families, we strongly support Int. 1412 (Safer Sanctuary Act) and Int. 214 (NYC Trust Act). We also support and provide brief recommendations to further enhance Int. 1272 and Int. 1268. All together, these bills help solidify this Council's commitment to defending and protecting all New Yorkers.

### **Int. 1412 - Safer Sanctuary Act**

Regarding Int. 1412, this legislation is essential to preserving the integrity of New York City's sanctuary framework—a framework built on hard lessons from our past. Before the Council passed the 2014 detainer laws, ICE had a pervasive presence on Rikers Island. Federal agents combed through DOC data to identify foreign-born individuals, conducted coercive interviews without counsel or interpreters, and pressured people to sign away their rights in languages they did not understand. These

practices violated due process, prolonged incarceration, and tore families apart—all while eroding trust between immigrant communities and local government.

In 2014, the Council acted decisively because the harms were real and widespread. As Speaker Melissa Mark-Viverito said at the time, these protections were about dignity, fairness, and keeping families together. They were designed to ensure that people held on low-level charges or simply because they could not afford bail would not be funneled into deportation. Sanctuary laws were passed to protect New Yorkers and uphold the integrity of our justice system—not to make a political statement about any administration, past or present.

With this written testimony, LAS also submits our Brief for the [Legal Aid Society](#) as Amicus Curiae, *City Council v. Adams*, No. 25-CV-01234 (S.D.N.Y. May 10, 2025), which provides not only the history of the harms that led to our detainer laws but also our opposition to this City’s recent effort with Executive Order 50 to erode those protections.

Int. 1412 closes a dangerous loophole by prohibiting ICE or other federal immigration authorities from maintaining offices or quarters on property under the jurisdiction of the Department of Correction. This ensures that our jails do not become gateways to deportation and that the trust immigrant communities place in this city is not betrayed. Allowing ICE to embed within DOC facilities would undermine the very purpose of our sanctuary laws and recreate the conditions that led to their passage in the first place.

#### **Int. 214 – NYC Trust Act**

We strongly support Int. 214, which creates a private right of action for violations of our detainer laws. This is critical because laws without remedies are hollow. When local agencies violate detainer laws, the harm is profound—not only to individuals and families, but to public trust in government. Accountability is the only way to ensure compliance and uphold the promise of equal justice.

New Yorkers are experiencing the devastating consequences of aggressive immigration enforcement. ICE is targeting both lawful residents and undocumented individuals through mass

arrests and racial profiling, terrorizing neighborhoods with roving patrols. Those swept up face prolonged detention under appalling conditions—record-high deaths, inadequate heating, inedible meals, and grossly neglected medical care. These conditions are not accidental; they are designed to coerce deportation. While we cannot unilaterally stop ICE from detaining individuals, we can and must end local government’s complicity in these abuses. By creating enforceable remedies for violations of our detainer laws, the NYC Trust Act takes a critical step toward that goal.

**Int. 1268**

We also support Int. 1268, requiring MOIA to develop signage describing legal protections and identifying non-public areas of city property. While the proposed signage would clearly and plainly describe the legal protections enacted in sections 4-210, 10-178, 21-977, and 23-1202 of the Administrative Code of the City of New York, we suggest these recommendations:

- 1) Mandate MOIA’s routine training of all city agencies regarding any developed signage, so that all city employees and contractors on these city properties are aware of and compliant with these legal protections; and
- 2) Ensure communication of these protections is also made accessible to those with limited literacy skills or those who are visually impaired, so that all will have full access to understanding these legal protections.

**Int. 1272**

We support Int. 1272, which prohibits pre-screening using E-Verify before a job offer is made. However, the bill should go further to extend the prohibition to any pre-screening for immigration status or work authorization, including paper I-9 forms, until after an offer is given. This aligns with existing protections for medical conditions and criminal background checks and reduces discrimination risk overall.

We applaud all of these efforts by this Council. Thank you for your leadership and for standing with all New Yorkers.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Deborah Lee', is written over a light blue rectangular background.

Deborah Lee, Esq.\*  
Attorney-in-Charge, Immigration Law Unit  
The Legal Aid Society

\*Admitted in New Jersey and Washington, D.C. (Not admitted in New York State)  
Practice Area: Solely Immigration and Nationality Law

## Speech

My name is Arash Azizzada and I'm the co-director for Afghans For A Better Tomorrow. Our organization was founded out of a crisis moment in the summer of 2021. The U.S. withdrawal had been set into motion and the repressive Taliban was on the cusp of a takeover of Afghanistan, jeopardizing the lives of countless Afghans. Across the country and across this city, people got together. Veterans, Afghan-Americans, faith-leaders, Fortune 500 companies – all of them working together to charter flights, submit passenger lists and ensure the evacuation of what eventually became 200,000 Afghans who entered the United States. A few thousand of those came here, becoming pillars and the backbone of New York City.

Today, our newly arrived Afghan refugee community finds itself in crisis again. In the past two weeks, we've seen the Trump administration capitalize and exploit a senseless tragedy to target, demonize and vilify our Afghan community. Just down the street at Federal Plaza, we've seen ICE target and detain innocent and vulnerable Afghans. Our community members and fellow New Yorkers were folks who were fleeing horrific conditions in Afghanistan, conditions that were partially created by the American government and American foreign policy. Afghans have already been betrayed numerous times by America; that is why today, we urge the city of New York and the City Council to stand alongside us, offer our Afghans protection and to resist any and all cooperation with ICE. That work can start today with the passage of INT 1268 and INT 1272, two bills that would educate our community about their rights and ensure that employers treat our vulnerable community members with dignity and respect. Our community members are afraid for their safety and that of their family members in the wake of increased targeted enforcement of Afghans. The least New York City can do is to stand alongside and empower the most vulnerable folks who seek safety and security in our precious city. That is the least we are owed.

Thank you.

Dear NYC Council,

New York City must stand up to protect our immigrant communities. I support the NYC Trust Act because the NYPD and Department of Corrections must be held accountable to follow our sanctuary laws. If they coordinate with or provide information to ICE in violation of New York City law, they should be liable. I support the Safer Sanctuaries Act because ICE must never again be given access to Rikers Island, regardless of mayoral administration.

Sincerely,

Claire Littlefield

Voter and Resident of Windsor Terrace, 11218

The Trust Act should be passed. City agencies which violate the NYC's Sanctuary laws should be liable to prosecution. How can we be expected to respect the law when our city agencies themselves ignore it?

F J Collis

My name is Heba Hazzaa and I am a citizen and resident of Forest Hills.

I moved to New York City in part because its vibrant immigrant culture. I remember how happy I was to pick up fruits and vegetables from the many fruit stands in our neighborhood. I am saddened to learn that NYPD cooperated with ICE to remove a fruit vendor from our neighborhood. Such attacks don't just harm individuals, they strip away our city from its soul.

As a naturalized citizen, an immigrant, a mother, the safety of my community matters deeply to me. Seeing people being abducted, children separated from their parents, families torn apart, and fear terrorizing our immigrant communities is devastating. It creates a sense of fear amongst all of us— regardless of our immigration status— and chips away at our sense of safety in our city. The violation of our sanctuary city laws is utterly unacceptable and we must do everything we can to protect them— to protect ourselves and each other.

**That's why I'm here to urge passage of the NYC Trust Act (Intro 214).**

This bill would create a **private right of action**, allowing anyone whose rights are violated by city agencies to bring a lawsuit and hold those agencies accountable. Right now, violations of NYC's sanctuary laws happen regularly, including documented cases of the DOC and ACS sharing information with ICE, but there is **no clear way to enforce the law** or seek recourse.

Strong sanctuary protections are essential not only for immigrant safety, but for the **health and stability of our city as a whole**. When immigrant New Yorkers fear local agencies, it erodes trust, discourages reporting of crimes, and prevents families from accessing essential services. Passing the Trust Act ensures that **city agencies cannot violate these protections with impunity**, and that immigrant families can live without the constant fear of detention or separation.

I urge the City Council to act swiftly to pass the NYC Trust Act and protect the safety, dignity, and rights of immigrant New Yorkers. Thank you.

**New York City Council – Committee on Immigration**

**Monday, December 8 at 10AM**

**Testimony of Lee Crawford**

Thank you for holding this hearing on these four bills that would strengthen protections for New York's immigrant communities. My name is Lee Crawford, and I'm here today as a New Yorker who cares deeply about the safety, dignity, and rights of my neighbors.

I am testifying today because the people of New York are under attack. And I believe strongly that the Council must reinforce the sanctuary protections that make all of us safer—and ensure that when our rights under existing law are violated, we have meaningful ways to defend ourselves.

For decades, through multiple administrations, New York City has built policies that protect people from the threat of detention or deportation. That commitment to welcoming immigrants with dignity has made this city safer for the nearly 3 million immigrants who call New York home—and, by extension, safer for every single one of us.

Everyone is safer when people can go to work, to school, or to medical appointments without fear of being kidnapped by federal immigration authorities. We are safer when people feel secure reporting a problem, participating in civic life, and engaging with public agencies without risking harm because of their immigration status. And we are safer when public servants understand that violating the law will carry consequences.

That is why I personally support **Intro 214**, which creates a private right of action so New Yorkers can enforce the rights we already have under existing law.

That is why I support **Intro 1412**, which adds protections against abuses of mayoral power that could undermine our sanctuary laws—abuses we have seen firsthand over the past year.

That is why I support **Intro 1268**, which helps New Yorkers understand our rights when interacting with federal immigration authorities, especially when moving between public and nonpublic spaces throughout the city.

And that is why I support **Intro 1272**, which prohibits the use of E-Verify on job applicants who have not actually been offered a job, and requires that applicants be informed when an employer participates in E-Verify.

I believe deeply that New York belongs to everyone who lives here. Our communities are strongest and safest when our friends, coworkers, and neighbors can live their lives without fear. I urge the City Council to pass these four bills before the end of this term so we can continue to protect one another and keep our city safe.

Thank you.

New York City Council Committee on Immigration

December 8, 2025 at 10AM

Testimony of Mahabuba Masud, Health Policy and Advocacy Intern at New York Lawyers for the Public Interest

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities and their health in New York City. My name is Mahabuba Masud from New York Lawyers for the Public Interest. NYLPI is a community-driven civil rights organization that fights for equal access to healthcare, education, government services, housing, and a clean environment for all people of New York. As advocates for equitable access to care for all immigrants in NYC, we support legislation that refuses collaboration between the city and immigration authorities.

Less than a year into a second Trump presidency, it has become horrifyingly evident how far this federal administration will go in its efforts to detain and deport immigrant members of our communities. We have also witnessed a mayoral administration's attempts to evade and undermine our city's longstanding, hard-fought protections for immigrant New Yorkers in order to serve the mayor's own self interest.

New York City's sanctuary laws are essential to maintaining trust among community members, ensuring the safety of all New Yorkers, and protecting their health. As our city government enters another period of transition, it is imperative that the City Council act swiftly to ensure that our city's commitment to welcoming and protecting immigrants is ironclad. Our local laws must provide clear, unambiguous prohibitions against colluding with immigration authorities, and must also include real disincentives for violating those laws. For those reasons, I am testifying today to urge this Council to act swiftly to pass the NYC Trust Act and Intro. 1412.

**New York's sanctuary laws help keep all of us safe.**

When immigrant New Yorkers lack confidence that City agencies and their representatives won't communicate and collude with ICE, either due to rhetoric from local leaders or examples of violations of our laws, this gives way to mistrust and fear. Research has demonstrated how fear and other barriers often prevent immigrants from accessing public services they are eligible for.<sup>1</sup> Under the current presidential administration, the fear that noncitizens carry as they go about their daily lives has escalated, deterring many from taking care of their most basic needs.<sup>2</sup>

We are deeply concerned about the health crisis that has only exacerbated since January 2025. The federal administration revoked policy protecting hospitals from ICE enforcement. As a result of this

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<sup>1</sup> Alulema, Daniela and Pavilon, Jacquelyn, "Immigrants' Use of New York City Programs, Services and Benefits: Examining the Impact of Fear and Other Barriers to Access.: (January 31, 2022) <https://cmsny.org/publications/nyc-programs-services-and-benefits-report-013122/>

<sup>2</sup> See, e.g., Reuven Bleu, *'They've Gone Off the Map': Fear Drives Immigrants Away From Clinics*, The City (Aug. 12, 2025), <https://www.thecity.nyc/2025/08/12/ice-fear-undocumented-immigrant-medical-services-nycare/>.

setback, there is an increased fear of ICE presence in healthcare spaces such as hospitals and clinics. At NYLPI, our clients and community members are reporting their hesitancy in going to medical settings and are avoiding medical care due to fear of arrest. They are unsure if accessing these public programs can also negatively impact their immigration status. We have also heard from pediatricians that fewer immigrant parents are bringing their children – including U.S. citizens and Lawful Permanent Residents – in for routine checkups. Other pediatricians have been asked by their patients to adopt or care for their children if they are deported. These policies of ICE operating in medical settings are a weapon against our community members, by adding barriers to their access to care. If people delay care in cases of emergencies and chronic conditions, which can worsen without medical intervention, the results can be detrimental to their health. If people continue to avoid medical care, there is also a greater likelihood for infectious diseases to spread in communities, especially in urban and dense communities like NYC.

When immigrant New Yorkers live in fear of interacting with the healthcare system, it discourages them from reaching out to these essential services in an emergency and when they need access to care. The perception that city service providers are working with ICE can have ripple effects throughout our systems of government and society. This is exactly why we need strong local policies in place that take a stance against city agencies colluding with ICE and protect our neighbors and their well-being.

**NYC Trust Act and Intro 1412 are necessary to protect immigrant New Yorkers from the harms of ICE detention.**

Our ongoing work through direct services, systematic advocacy, and coordinating medial-legal partnerships inspires us to address the human rights crisis in immigration detention and advocate for healthcare for all New Yorkers. When immigrant New Yorkers face immigration enforcement, they are subjected to egregious lack of medical care in ICE detention. At NYLPI, we have extensively documented systemic medical violations in immigration detention centers such as the Orange County Jail (OCJ). Our published report, [Denied Care: Denied Dignity](#) highlights the rampant medical abuse and neglect on detained individuals by ICE. We reviewed medical records for nineteen individuals detained at OCJ, and found a pattern of inadequate medical treatment, creating grave risks for detained individuals. Individuals with chronic health conditions are especially vulnerable in carceral settings, as they require consistent and specialized care that is often unavailable in these facilities. Detention strips away their ability to manage their health, a process many had successfully handled for years prior to their confinement. We also see most acute harms: isolation, neglect, and unsafe conditions that compound trauma and can create lasting mental health crises. The eroding health status and trust in the system among our communities is not only a matter of immigration. It is about the health and well-being of our families, neighbors and community members.

**The City Council must pass the New York City Trust Act to ensure that our sanctuary laws are complied with and to protect the well-being of our immigrant community.**

Our city's sanctuary laws provide important protections and assurances for noncitizen New Yorkers. However, a number of city agencies – most notably, the NYPD and the Department of Corrections (DOC) – have violated these laws in recent years, resulting in grave harm to our immigrant community members for whom detention and deportation can be very difficult to stop. In February of 2023, this committee held an oversight hearing that revealed that the DOC had been overtly colluding with ICE to transfer immigrants from DOC to ICE custody in violation of our laws. Communications obtained through a public records request unequivocally showed clear violations and extreme anti-immigrant sentiment within the agency with email communications to ICE from the Department of Corrections using the hashtag #teamsendthemback.<sup>3</sup> Earlier this year, a report by the city Department of Investigation found that a DOC investigator shared sensitive information with ICE that led to the arrests of two immigrants in violation of city law.<sup>4</sup> Even ACS has had documented instances of sharing information with ICE in violation of our laws, leading to detention.<sup>5</sup> When violations like this occur, our city law offers no clear avenue for recourse. Our existing sanctuary protections need to be enforced if we are to have meaningful trust between immigrant communities and government actors.

Violations that cause family separation, anxiety or lead to detention are unacceptable. These violations of sanctuary laws have ripple effects across our city; when individuals are unlawfully detained, the families and children are left without supervision. These families could face financial hardship and deal with psychological stress and trauma. Upholding our sanctuary laws not only protects immigrant individuals, but also their families and communities from preventable suffering.

For this reason, we urge passage of the New York City Trust Act (Intro. 214-2024), a bill currently before this committee which will create a private right of action so that people wronged by violations of these laws can seek justice in court. If New York City agencies continue to ignore local detainer laws, immigrant New Yorkers and their communities can be burdened with long-term harm including poor physical and mental health outcomes. This bill upholds that all city agencies must be accountable to sanctuary laws and prevent family separation.

### **The City Council must ensure that ICE is never allowed to return to Rikers Island**

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<sup>3</sup> Arya Sundaram and Matt Katz, *Emails reveal coy relationship, cooperation between NYC correction officers and ICE*, Gothamist (Feb. 16, 2023), <https://gothamist.com/news/teamsendthemback-private-emails-reveal-cozy-relationship-cooperation-between-nyc-correction-officers-and-ice>.

<sup>4</sup> Emily Ngo, *NYC staffer violated 'sanctuary' laws by sharing migrant info with feds: report*, Politico (Sep. 25, 2025), <https://www.politico.com/news/2025/09/25/nyc-staffer-violated-sanctuary-laws-by-sharing-migrant-info-with-feds-report-00580799>.

<sup>5</sup> Yasmine Farhang and Zoe Schonfeld, *Op-Ed: As Trump vows to target immigrants, NYC must take action now to protect families*, AMNY (Nov. 23, 2024).

When the city's detainer laws were amended a little more than a decade ago, one of the major achievements at the time was closing the offices that ICE maintained on Rikers Island. Prior to then, ICE operated a trailer on Rikers that made its collusion with the DOC seamless. The amended detainer laws ended that practice by prohibiting federal immigration authorities from maintaining quarters on DOC land for the purpose of investigating violations of civil immigration law.<sup>6</sup>

Despite the clear intent of the City Council and more than a decade without any permanent ICE presence on Rikers, earlier this year, Mayor Eric Adams attempted to exploit language in the current law by issuing an executive order to restore the presence of ICE on Rikers.<sup>7</sup> The move was widely condemned and ultimately struck down in state court.<sup>8</sup> However, the efforts of the outgoing administration raise the need to tighten and clarify our detainer laws.

Intro. 1412-2025 would remove any ambiguity about the purpose of the detainer law by clearly prohibiting federal immigration authorities from maintaining quarters on DOC property for any purpose. The bill would also revise how immigration authorities are defined to reflect the broad ways in which federal entities are being weaponized to enforce immigration law. At a time when so many federal resources are being misdirected to advance Trump's deportation agenda and the distinctions between immigration enforcement and other federal law enforcement are crumbling, it is critical that our laws bar collusion with immigration enforcement plainly and completely.

### **The time to act is now.**

The Trump administration's attack on our immigrant families and community members will likely continue in the future. It is now more important than ever for New York City to be prepared for what is to come and protect the rights, health, and well-being of all immigrants who call this place their home. If the Council passes New York City Trust Act and Intro. 1412, we can be one step closer to fortifying our city from the federal administration's assaults and fostering a thriving space for all of our neighbors.

### **Conclusion**

Thank you, Chairperson Avilés and the Committee, for giving us the opportunity to present testimony today. We look forward to continuing our work to safeguard immigrant New Yorkers and preserve access to healthcare. **Health is a human right.**

Mahabuba Masud, Health Justice Program

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<sup>6</sup> NYC Admin. Code § 9-131(h)(2).

<sup>7</sup> Reuven Bleu and Gwynne Hogan, *Adams Administration Inks Executive Order Allowing ICE Back on Rikers Island*, The City (April 9, 2025), <https://www.thecity.nyc/2025/04/09/rikers-island-ice-executive-order/>.

<sup>8</sup> Luis Ferre-Sadurni, *Adams Administration Move to Let ICE Into Rikers Is Illegal, Judge Rules*, N.Y. Times (Sep. 8, 2025), <https://www.nytimes.com/2025/09/08/nyregion/judge-adams-ice-rikers.html>.

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*NYLPI has fought for more than 40 years to protect civil rights and achieve lived equality for communities in need. Led by community priorities, we pursue health, immigrant, disability, and environmental justice. NYLPI combines the power of law, organizing, and the private bar to make lasting change where it is needed most.*

*NYLPI's Health Justice Program brings a racial equity and immigrant justice focus to health care advocacy, including ongoing work addressing the human rights crisis in immigration detention and advocating for healthcare for all New Yorkers*

New York City Council Committee on Immigration

December 8, 10AM

Testimony of Mina Farahmand from NYC Union of Students and the Livable Future Package

Thank you for holding this hearing. My name is Mina Farahmand, and I am from the NYC Union of Students and the Livable Future Package—a youth-led movement speaking in support of the NYC Trust Act intro 214.

This federal administration has shown us that their immigration agenda is one that disregards the core of our human rights. Only a few days ago they separated and detained a 6-year-old child from his father, and the Trump administration fired eight NYC immigration judges last week in an effort to make it easier for the federal government to conduct a mass deportation agenda. I speak for my fellow youth and their families when I say this is unacceptable. There's no sign this federal agenda will get better without us fighting back putting teeth on our sanctuary city laws as the ICE budget finds a nearly fourfold increase. We are in a state of emergency and the NYPD has been found complicit in this agenda.

A report last week found that on Nov. 21, 2024, an NYPD officer assigned to a Homeland Security Investigations (HSI) violent gang task force placed automated alerts on individuals sought for potential civil immigration enforcement, allowing notifications if they appeared in NYPD systems. DOI determined this violated both department policy and city law.

What you are hearing from us today is that NYC collaboration with the federal draconian immigration enforcement agenda **is completely unacceptable**. NYC agencies' history of

illegally working with ICE must go on no longer. In this state of emergency we need to act to stop our city's complicity with an anti-human rights agenda. The City Council must pass the NYC Trust Act to enforce our sanctuary city laws because financial restitution is a strong and effective deterrent against breaking our human rights laws, and it gives power to the people irreparably harmed by collusion with ICE. Our sanctuary city must extend to **every part of this city**, including Riker's Island, which is also why I speak in favor of Intro 1412.

New York City Council, make the right choice. Stand for **strong sanctuary city laws in this state of emergency** and **end our complicity** with an anti-human rights agenda.

Good morning, and thank you for the opportunity to testify today.

My name is Múle Herrera, and I am a Queer Mexican Immigrant and Community Advocate at Mixteca, a community-based organization in Sunset Park, Brooklyn, that has served the Latinx and Indigenous immigrant community for 25 years.

We want to welcome the proposals put forward by our elected officials Alexa Avilés, Shahan Hanif, and Tiffany Cabán. My colleagues here in the room and I deeply recognize the urgency of these proposals at a time when our community continues to face constant attacks.

Mixteca has decided to highlight **Introduction 214-A** and **Introduction 1268** because they address two critical gaps our community experiences daily.

**Regarding Introduction 214-A**, which creates a private right of action related to civil immigration detainers and cooperation with federal immigration authorities: at Mixteca we encounter multiple cases every week where a community member has been detained illegally, often in spaces that should be safe for a dignified life for all New Yorkers. This proposal gives people and advocates the opportunity to seek accountability from local agencies.

However, we must be realistic: many members of our community do not have the resources or time to hire an attorney, and the justice system is not always accessible, particularly when your intersections are being Latine, Indigenous, a migrant, a woman, or a queer person. For this reason, while we welcome this proposal as a small light of hope, local and concrete intervention are indispensable to ensure justice for all, not just for a few.

**Regarding Introduction 1268**, which focuses on education and rights prevention through public signage: we value this initiative because it amplifies rights information beyond community-based organizations. Placing this information in public spaces demonstrates the city's presence and oversight regarding ICE actions and empowers the community.

Since January of this year, Mixteca has conducted 85 Know Your Rights workshops, reaching over more than 1,700 people, with just two team members, not including the daily consultations we receive during walk-in hours.

Yet today, our community increasingly doubts the effectiveness of Know Your Rights workshops. People often question their utility, which underscores the need to update the information to reflect the current reality: it is crucial that the community knows how the city can protect and assist them when their rights are violated.

Therefore, we urgently need MOIA to provide direct training to local agency staff, teaching them how to act and what steps to follow to protect New Yorkers when immigration agents enter city spaces, more than just sending PDFs. Real safety depends on staff knowing how to intervene effectively, with city-established rapid response protocols and de-escalation measures.

This is fundamental to realizing the idea of a sanctuary city. As a community advocate, I want to be able to accompany someone to a hospital or school and trust that if ICE arrives, the staff will be prepared to intervene realistically and protect the people they serve, with City support.

In conclusion, we welcome these proposals and recognize the critical protections and empowerment they represent, but we must ensure that implementation is concrete, realistic, and backed by direct city support. Solo así la promesa de una ciudad santuario se volverá la realidad para todes.

Dear Sir or Madam,

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities in New York City. My name is Olivia Bueno, I am a lifelong New Yorker and the daughter of an immigrant. In addition, I have worked extensively with immigrant and refugee communities both in the US and abroad. I have been gravely concerned about the assault on immigrant rights and welfare carried out by the Trump administration since it came to office earlier this year. I can see how such policies would have made it next to impossible for the refugees with whom I worked in the past to gain protection.

New York relies on its immigrant communities and their protection is not only moral but about our collective well-being. New York City's sanctuary laws have been vital in this respect, ensuring that all New Yorkers are able to access services, ensuring that immigrants are not dissuaded from reporting crimes that could endanger other New Yorkers, and ensuring that the city's economy functions effectively.

Unfortunately, however, the assault on immigrant rights is taking new forms and thus new protections are needed to ensure immigrant safety and security. I am therefore writing in support of a number of proposals for such new protections, specifically:

- **NYC Trust Act (Int 214, Hanif)** – This measure will help to promote trust among immigrant communities. [Intro 214](#) will allow people wronged by violations of our laws by law enforcement actors to seek justice, including the payment of money. The threat of such actions will further encourage compliance with local law, and prevent future violations.
- **Safer Sanctuary Act (Int 1412, Cabán)** - This measure will make it absolutely clear that federal immigration authorities are not allowed to maintain offices in properties controlled by the city department of corrections and updates the definition of immigration authorities to reflect current practices. This measure is necessary to guard against the possibility that some city leaders may seek to accommodate the administration in violation of local standards.
- In addition, I encourage the City to engage in information sharing with immigrant communities so that they are aware of the current situation, their vulnerabilities and their rights.

**Please pass the New York City Trust Act to ensure that our sanctuary laws are complied with and act to ensure that ICE will not be allowed to return to Rikers Island.**

New York City needs to be prepared for what is to come and not waver when it comes to protecting the rights of the millions of foreign-born residents who call this city their home. The Council must act now to pass the New York City Trust Act and Intro. 1412, and

continues to explore ways to fortify and bolster our proud tradition of refusing to collude with immigration authorities.

Yours sincerely,

Olivia Bueno

# Written Testimony to the New York City Council Committee on Immigration

**RE: Support for Introduction 214-A, Introduction 1268, Introduction 1272, and Introduction 1412**

**Submitted by:** Tan Hayat, Manager of Advocacy & Impact Strategy

**Organization:** Sakhi for South Asian Survivors

**Date:** 12/8/25

**Contact:** tan.hayat@sakhi.org

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My name is Tan Hayat, and I am the Manager of Advocacy & Impact Strategy at Sakhi for South Asian Survivors. Thank you for the opportunity to submit testimony in strong support of Introduction 214-A, Introduction 1268, Introduction 1272, and Introduction 1412.

Founded in 1989, Sakhi is the largest organization working with survivors of gender based violence New York City's South Asian and Indo-Caribbean immigrant communities. For 36 years, we have worked with more than 15,000 survivors through crisis intervention, safety planning, economic empowerment, mental health counseling, housing assistance, and legal advocacy—all delivered in multiple South Asian languages.

We know through our work with survivors that immigration status operates as one of the most effective tools of coercive control in cases of gender-based violence. Research by South Asian SOAR shows that 26% of South Asian survivors experience immigration-related harm specifically.<sup>1</sup> Those causing harm threaten to call ICE, refuse to file immigration paperwork, hide documents, and exploit survivors' unfamiliarity with U.S. legal protections. In South Asian communities—where 35% of survivors experience economic harm and many face isolation—immigration-related threats compound existing patterns of control.

Introduction 214-A creates essential accountability that has been absent from our sanctuary framework. We have witnessed city agencies violate sanctuary protections while facing no consequences. For survivors with pending U-visa applications or VAWA self-petitions who must appear in Family Court or Criminal Court, these violations create impossible choices between pursuing legal protection and risking deportation. The private right of action transforms sanctuary protections from aspirational language into enforceable rights and directly supports our work helping survivors navigate legal systems while maintaining safety. Sakhi strongly supports the passage of Int. 214-A.

Introduction 1268 addresses how survivors access information about their rights. Many immigrant survivors are unaware of existing federal protections they can access. Many come

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<sup>1</sup> <https://www.southasiansoar.org/gbvprimer>

from communities where those causing harm have convinced survivors that seeking help will result in deportation. Visible signage in city facilities creates touchpoints for critical information at moments when survivors encounter the system for the first time, often in crisis. For survivors who are isolated or have limited English proficiency, these culturally-responsive public displays will validate that protections exist and counter the narratives used to maintain control. Sakhi strongly supports the passage of Int. 1268.

Introduction 1272 protects pathways to economic independence that are fundamental to survivors' ability to leave violent situations. Our Economic Empowerment Program works with survivors on job applications and education, but discriminatory employment practices create barriers that maintain economic dependence. E-Verify misuse disproportionately affects workers with hyphenated names<sup>2</sup>, common in South Asian communities, and allows discrimination against workers who appear or sound foreign. For survivors leaving situations where economic control is a primary tool of harm, fair access to employment becomes essential to remaining safely independent. Survivors with pending VAWA applications or U-visas have legal work authorization that employers frequently misunderstand. This bill protects survivors' ability to achieve the economic independence that makes safety possible. Sakhi strongly supports the passage of Int. 1272.

Introduction 1412 addresses the current administration's use of novel enforcement methods to circumvent sanctuary protections and prevents normalization of immigration enforcement infrastructure in city facilities. The use of laws like the Alien Enemies Act has created deliberate ambiguity about whether city cooperation violates sanctuary laws. Survivors interact with criminal justice systems as defendants, witnesses, family members, or when providing victim impact statements. Immigration enforcement infrastructure in city facilities creates surveillance systems that deter engagement at every level. The chilling effect extends to entire communities, including family members and other sources of support that survivors need. This bill clarifies that all immigration enforcement falls under non-cooperation policies and removes enforcement infrastructure from city facilities. Sakhi strongly supports the passage of Int. 1412.

The current sociopolitical climate makes these protections urgent. We are witnessing survivors delay seeking help due to immigration fears, families avoiding essential services, and increased reluctance to engage with the immigration court system. While we cannot control federal policy, these city-level protections determine whether New York City's systems become tools of enforcement or remain accessible to survivors seeking safety. These bills create accountability, ensure information reaches those who need it, protect economic pathways to independence, and clarify that sanctuary protections apply comprehensively.

Immigration justice and gender justice are inseparable. These four bills collectively create the conditions necessary for survivors to escape violence, access justice, and rebuild their lives. Sakhi urges the Council to pass Introduction 214-A, Introduction 1268, Introduction 1272, and Introduction 1412.

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<sup>2</sup> <https://www.cato.org/blog/e-verify-errors-harmed-760000-legal-workers-2006>

Thank you for your leadership on these critical issues. Please do not hesitate to reach out with any questions.

Testimony for Committee on Immigration – Dec. 8, 2025

I'm submitting this written testimony in support of the NYC TRUST Act, because I believe New York City should welcome citizens from other countries as part of our community. Our city has been built by generations of immigrants and must continue to be a place where people can come to find new opportunities. I'm proud that our city has sanctuary laws in place to protect these members of our community, but it's distressing to hear that information about migrants continues to be shared with ICE illegally, leading to tragic consequences for individuals and their families. I support the NYC TRUST Act because it will hold city agencies accountable for these violations and will hopefully put an end to the illegal data sharing as a result.

I urge you to pass the NYC TRUST Act.

Sincerely,

Sarah Cullen

A New Yorker for 30 years and counting!

**From:** [sarah ferholt](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL] written testimony  
**Date:** Thursday, December 4, 2025 8:56:41 PM

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New York City Council Committee on Immigration  
December 8, 10AM  
Testimony of Sarah Ferholt

Thank you to the Committee on Immigration for holding this hearing. My name is Sarah Ferholt, and I am a member of **Hand in Hand: The Domestic Employers Network**, a national organization of families, older adults, and disabled New Yorkers who employ care workers — including nannies, home care workers, and house cleaners.

Immigrant care workers, many of whom are undocumented, have green cards, or are naturalized citizens, are facing real threats. ICE continues to racially profile and collude with city agencies like the NYPD and Department of Corrections, putting families and workers at risk of detention, deportation, and family separation. These attacks don't just harm individuals, they **undermine the care systems we all rely on**.

This is critical to me, because I know so many people who are vulnerable to ICE and their illegal abductions, people who contribute so much value to my life, the lives of my friends and family, and my community. They should be safe! **That's why I'm here to urge passage of the NYC Trust Act (Intro 214)**.

This bill would create a **private right of action**, allowing anyone whose rights are violated by city agencies to bring a lawsuit and hold those agencies accountable. Right now, violations of NYC's sanctuary laws happen regularly, including documented cases of the DOC and ACS sharing information with ICE, but there is **no clear way to enforce the law** or seek recourse.

Strong sanctuary protections are essential not only for immigrant safety, but for the **health and stability of our city as a whole**. When immigrant New Yorkers fear local agencies, it erodes trust, discourages reporting of crimes, and prevents families from accessing essential services. Passing the Trust Act ensures that **city agencies cannot violate these protections with impunity**, and that immigrant families can live without the constant fear of detention or separation.

I urge the City Council to act swiftly to pass the NYC Trust Act and protect the safety, dignity, and rights of immigrant New Yorkers. Thank you.

Sincerely,

Sarah Ferholt

Parent, teacher, NYC resident of over 30 years, and concerned community member.

**From:** [Sarah Rosenblatt](#)  
**To:** [Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Sunday, November 30, 2025 6:18:46 PM

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New York City Council Committee on Immigration  
December 8, 10AM  
Testimony of Sarah Rosenblatt

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities in New York City. My name is Sarah Rosenblatt, and this issue is important to me because I believe that immigrants have just as much a right to be in this country as citizens. Whether they have documentation or are considered "productive" in society does not matter to me - all human beings have value.

Less than a year into a second Trump presidency, it has become horrifyingly clear how far this federal administration will go in its efforts to detain and deport immigrant members of our communities. We have also witnessed a mayoral administration's attempts to evade and undermine our city's longstanding, hard-fought protections for immigrant New Yorkers in order to serve the mayor's own self interest.

New York City's sanctuary laws are essential to maintaining trust among community members and ensuring the safety of all New Yorkers. As our city government enters another period of transition, it is imperative that the City Council act swiftly to ensure that our city's commitment to welcoming and protecting immigrants is ironclad. Our local laws must provide clear, unambiguous prohibitions against colluding with immigration authorities, and must also include real disincentives for violating those laws. For those reasons, I am testifying today to urge this Council to act swiftly to pass the NYC Trust Act and Intro. 1412. **New York's sanctuary laws help keep all of us safe.**

When immigrant New Yorkers lack confidence that City agencies and their representatives won't communicate and collude with ICE, either due to rhetoric from local leaders or examples of violations of our laws, this gives way to mistrust and fear. Research has demonstrated how fear and other barriers often prevent immigrants from accessing public services they are eligible for. Under the current presidential administration, the fear that noncitizens carry as they go about their daily lives has escalated, deterring many from taking care of their most basic needs.

When immigrant New Yorkers live in fear of interacting with local government, it makes all of us less safe. The perception that police, city service providers, or other municipal employees are working with ICE discourages people with uncertain status or those immigrant

family members from reaching out in an emergency, participating in investigations, and engaging with the court process – a reality that has ripple effects throughout our system of government and society. This is exactly why our city’s sanctuary laws have persisted for decades and transcended partisan lines. When strong local policies are in place that clearly protect against localities communicating and colluding with ICE, domestic violence and other crimes are more likely to be reported.

**The City Council must pass the New York City Trust Act to ensure that our sanctuary laws are complied with.**

When properly adhered to, our city’s sanctuary laws provide important protections and assurances for noncitizen New Yorkers. However, a number of city agencies – most notably, the NYPD and the Department of Corrections (DOC) – have violated these laws in recent years, resulting in grave harm to immigrants for whom detention and deportation can be very difficult to stop. In February of 2023, this committee held an oversight hearing that revealed that DOC had been overtly colluding with ICE to transfer immigrants from DOC to ICE custody in violation of our laws. Communications obtained through a public records request unequivocally showed clear violations and extreme anti-immigrant sentiment within the agency with email communications to ICE from the Department of Corrections using the hashtag #teamsendthemback. Earlier this year, a report by the city Department of Investigation found that a DOC investigator shared sensitive information with ICE that led to the arrests of two immigrants in violation of city law. Even ACS has had documented instances of sharing information with ICE in violation of our laws, leading to detention.

When violations like this occur, our city law offers no clear avenue for recourse. Our existing sanctuary protections need to be enforced if we are to have meaningful trust between immigrant communities and government actors. Violations that cause family separation, anxiety or lead to detention are unacceptable, and those who would violate our sanctuary laws need to know that there will be real consequences for doing so.

For this reason, we urge passage of the New York City Trust Act (Intro. 214-2024), a bill currently before this committee which will create a private right of action so that people wronged by violations of these laws can seek justice in court. Immigrant New Yorkers and their communities suffer long-term harm when New York City agencies ignore and misinterpret local detainer laws. This bill would make sure that all city agencies can be held accountable when this happens, helping ensure compliance and preventing family separation.

**The City Council must ensure that ICE is never allowed to return to Rikers Island**

When the city’s detainer laws were amended a little more than a decade ago, one of the major achievements at the time was getting rid of the offices that ICE maintained on Rikers Island. Prior to then, ICE operated a trailer on Rikers that made its collusion with the DOC seamless. The amended detainer laws ended that practice by prohibiting federal immigration authorities from maintaining quarters on DOC land for the purpose of investigating violations of civil immigration law.

Despite the clear intent of the City Council and more than a decade without any permanent

ICE presence on Rikers, earlier this year, outgoing Mayor Eric Adams attempted to exploit language in the current law by issuing an executive order to restore the presence of ICE on Rikers. The move was widely condemned and ultimately struck down in state court. However, the efforts of the outgoing administration raise the need to tighten and clarify our detainer laws.

Intro. 1412-2025 would remove any ambiguity about the purpose of the detainer law by clearly prohibiting federal immigration authorities from maintaining quarters on DOC property for any purpose. The bill would also revise how immigration authorities are defined to reflect the broad ways in which federal entities are being weaponized to enforce immigration law. At a time when so many federal resources are being misdirected to advance Trump's deportation agenda and the distinctions between immigration enforcement and other federal law enforcement are crumbling, it is critical that our laws bar collusion with immigration enforcement plainly and completely.

**The time to act is now.**

With billions of dollars in new funding, the Trump administration's assault on immigrants will likely only escalate. New York City needs to be prepared for what is to come and not waver when it comes to protecting the rights of the millions of foreign-born residents who call this city their home. The Council must act now to pass the New York City Trust Act and Intro. 1412, and continues to explore ways to fortify and bolster our proud tradition of refusing to collude with immigration authorities.

**Sarah Rosenblatt**  
she/her/hers

New York City Council Committee on Immigration  
December 8, 10AM  
Testimony of Sierra Smigelskiy, resident of New York City

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities in New York City. My name is Siera Smigelskiy.

Less than a year into a second Trump presidency, it has become horrifyingly clear how far this federal administration will go in its efforts to detain and deport immigrant members of our communities. We have also witnessed a mayoral administration's attempts to evade and undermine our city's longstanding, hard-fought protections for immigrant New Yorkers in order to serve the mayor's own self-interest.

New York City's sanctuary laws are essential to maintaining trust among community members and ensuring the safety of all New Yorkers. As our city government enters another period of transition, it is imperative that the City Council act swiftly to ensure that our city's commitment to welcoming and protecting immigrants is ironclad. Our local laws must provide clear, unambiguous prohibitions against colluding with immigration authorities, and must also include real disincentives for violating those laws. For those reasons, I am testifying today to urge this Council to act swiftly to pass the NYC Trust Act and Intro. 1412. . **New York's sanctuary laws help keep all of us safe.**

When immigrant New Yorkers lack confidence that City agencies and their representatives won't communicate and collude with ICE, either due to rhetoric from local leaders or examples of violations of our laws, this gives way to mistrust and fear. Research has demonstrated how fear and other barriers often prevent immigrants from accessing public services they are eligible for. Under the current presidential administration, the fear that noncitizens carry as they go about their daily lives has escalated, deterring many from taking care of their most basic needs.

**Unfortunately, it is all too possible to live and work in New York and not realize that anything is amiss. That's why it's so essential that those of us who know better speak up about the effect of these policies. As the spouse of a documented immigrant, I understand intimately what rights and privileges my husband enjoyed, no matter his own challenging immigration, in contrast with so many people who have simply experienced less luck and yet who made it here and form part of manifold, overlapping communities. As the pandemic made clear, when we inhabit the same space we profoundly affect each other, regardless of documentation status.**

When immigrant New Yorkers live in fear of interacting with local government, it makes all of us less safe. The perception that police, city service providers, or other municipal employees are working with ICE discourages people with uncertain status or those immigrant family members from reaching out in an emergency, participating in investigations, and engaging with the court process – a reality that has ripple effects

throughout our system of government and society. This is exactly why our city's sanctuary laws have persisted for decades and transcended partisan lines. When strong local policies are in place that clearly protect against localities communicating and colluding with ICE, domestic violence and other crimes are more likely to be reported.

**The City Council must pass the New York City Trust Act to ensure that our sanctuary laws are complied with.**

When properly adhered to, our city's sanctuary laws provide important protections and assurances for noncitizen New Yorkers. However, a number of city agencies – most notably, the NYPD and the Department of Corrections (DOC) – have violated these laws in recent years, resulting in grave harm to immigrants for whom detention and deportation can be very difficult to stop. In February of 2023, this committee held an oversight hearing that revealed that DOC had been overtly colluding with ICE to transfer immigrants from DOC to ICE custody in violation of our laws. Communications obtained through a public records request unequivocally showed clear violations and extreme anti-immigrant sentiment within the agency with email communications to ICE from the Department of Corrections using the hashtag #teamsendthemback. Earlier this year, a report by the city Department of Investigation found that a DOC investigator shared sensitive information with ICE that led to the arrests of two immigrants in violation of city law. Even ACS has had documented instances of sharing information with ICE in violation of our laws, leading to detention.

When violations like this occur, our city law offers no clear avenue for recourse. Our existing sanctuary protections need to be enforced if we are to have meaningful trust between immigrant communities and government actors. Violations that cause family separation, anxiety or lead to detention are unacceptable, and those who would violate our sanctuary laws need to know that there will be real consequences for doing so.

For this reason, we urge passage of the New York City Trust Act (Intro. 214-2024), a bill currently before this committee which will create a private right of action so that people wronged by violations of these laws can seek justice in court. Immigrant New Yorkers and their communities suffer long-term harm when New York City agencies ignore and misinterpret local detainer laws. This bill would make sure that all city agencies can be held accountable when this happens, helping ensure compliance and preventing family separation.

**The City Council must ensure that ICE is never allowed to return to Rikers Island**

When the city's detainer laws were amended a little more than a decade ago, one of the major achievements at the time was getting rid of the offices that ICE maintained on Rikers Island. Prior to then, ICE operated a trailer on Rikers that made its collusion with the DOC seamless. The amended detainer laws ended that practice by prohibiting federal immigration authorities from maintaining quarters on DOC land for the purpose of investigating violations of civil immigration law.

Despite the clear intent of the City Council and more than a decade without any permanent ICE presence on Rikers, earlier this year, outgoing Mayor Eric Adams attempted to exploit language in the current law by issuing an executive order to restore the presence of ICE on Rikers. The move was widely condemned and ultimately struck down in state court. However, the efforts of the outgoing administration raise the need to tighten and clarify our detainer laws.

Intro. 1412-2025 would remove any ambiguity about the purpose of the detainer law by clearly prohibiting federal immigration authorities from maintaining quarters on DOC property for any purpose. The bill would also revise how immigration authorities are defined to reflect the broad ways in which federal entities are being weaponized to enforce immigration law. At a time when so many federal resources are being misdirected to advance Trump's deportation agenda and the distinctions between immigration enforcement and other federal law enforcement are crumbling, it is critical that our laws bar collusion with immigration enforcement plainly and completely.

**The time to act is now.**

With billions of dollars in new funding, the Trump administration's assault on immigrants will likely only escalate. New York City needs to be prepared for what is to come and not waver when it comes to protecting the rights of the millions of foreign-born residents who call this city their home. The Council must act now to pass the New York City Trust Act and Intro. 1412, and continues to explore ways to fortify and bolster our proud tradition of refusing to collude with immigration authorities.

Date: December 8, 2025:  
From: Dr. Steve Auerbach on behalf of the NY Doctors Coalition  
To: NYC City Council - Committee on Immigration  
Subject: In support of Intros 214, 1268, 1272 and 1412



My name is Dr. Steve Auerbach. I am a retired pediatrician and career US Public Health Service Officer and medical epidemiologist. I am here speaking for the over 1000 members of the New York Doctors Coalition (NYDocs) in support of Intros 214, 1268, 1272, and 1412. Since our founding in 2016, we have evolved to be an informal collective of all health and health care workers to provide health professional support behind the scenes, and a public facing “white coat and scrubs presence” for other progressive social, economic, racial, labor, worker housing, carceral and immigrant justice organizations and campaigns.

Now, before we get to the specifics of today's agenda, I want to highlight some of the truths about immigrants and refugees in America. They, or should I say we, are a vital and irreplaceable part of American history and our social and moral fabric, and our economy. We all know who's building our buildings and picking our crops and delivering our food. Less recognized is that immigrants and refugees are a necessary and needed component of health workers in America. Many of our doctors, nurses, hospital aides, home care attendants, are immigrants. Not only are our patients, who are also your friends and neighbors, being made afraid to come see the doctor when they are sick for fear of being snatched off the street by anonymous thugs in masks, but there are health care workers afraid to go to their jobs.

In addition, and contrary to the lies being spewed for years, refugees and immigrants, including undocumented, pay far more into the economy in taxes than they use. It is a simple nonpartisan fact, per numerous reports including the Congressional Budget Office and from other independent economists, that immigrants are net contributors to Medicare and Social Security. Refugees and Immigrants including the undocumented use less in social services than they pay into the economy. So when that old MAGA guy is spewing dishonest hate against immigrants, in fact, our Medicare and their Social Security are being paid for by our currently working immigrant brethren.

Now with regard to the sanctuary package of bills, I want to thank the committee for bringing these forward, and for allowing me to speak in their support.

On the one hand, we are opposed broadly to the current federal administration's policies of demonization and terrorizing of immigrant communities and the mass kidnappings of individuals. Recognizing that lacking immigration status is at most a civil and not criminal offense, we are opposed to mass violation of civil rights and the lack of normative individual level due process. However as health care professionals we have our lane as it were, and defer supportively to other groups on those broader issues. Specifically as health and healthcare professionals:

**We demand that Immigration and Customs Enforcement (ICE) and related immigration enforcement agents and agencies stay out of all health care facilities. All our patients deserve privacy and safety with their care. When ICE**

**or other such agents are present in health care facilities, it interferes with the privacy, safety and care for all of our patients and all of our staff.**

To accomplish this demand:

We urge that there be stronger written, publicized, and enforced policies from the leadership of all health care facilities for ICE to stay out of all nonpublic areas of all health care facilities.

This includes New York City Health and Hospitals (H+H) and the NYC Department of Health and Mental Hygiene (DOHMH). It also includes all of the so-called voluntary hospitals and clinics in the city which as private not-for-profit licensed facilities have a regulatory relationship with the City and State governments. We call on the City Council and Mayor to work directly with H+H and DOHMH and also the independent hospitals' leadership and their representatives such as the Greater New York Hospital Association (GNYHA) and Healthcare Association of New York State (HANYS), to assure the strictest "ICE out of health care" rules are in place, publicized, and enforced.

Nor should ICE or similar agencies have access to health records, medical billing or insurance records, despite at the federal level Department of Homeland Security (DHS) demanding that Centers for Medicare and Medicaid Services (CMS) share such data. So to the extent possible, we urge the Mayor and City Council to take a lead on protecting such patient confidentiality.

We hope that the passage of this package of bills – Intros 214, 1268, 1272, and 1412 – will be a first step to also protecting health care workers, health care spaces and all our patients, from the depredations of ICE and related authorities.

And we would ask that this Committee (working with the appropriate other City Council Committees and Mayor's Office and City Agencies as appropriate), as it moves forward with immigrant and refugee protection, actively engage with all health and health care partners to assure ICE and related authorities stay out of health care. This includes not only the public entities such as Health and Hospitals and the Department of Mental Health and Hygiene, but also the so-called private not-for-profit voluntary hospital and all their affiliated facilities, and also the numerous health care professional organizations including but not limited to the County Medical Societies, the many Medical Specialty and Nursing Academies; as well as the health-affiliated unions such as 1199, New York State Nurses Association (NYSNA), Committee of Interns and Residents (CIR) and the Doctors Council. Many of our medical professional brethren already agree with this but are seeking support in writing and enforcement of these policies. Alas not all of our health professional colleagues agree; nor do some of the senior executives and perhaps many of the controlling Board of Directors who run the private hospitals who have been weak in affirming the principle of ICE out of health care. We ask that you bring all such controlling stakeholders to the table as well, with the objective to keep ICE out of Health Care.

I thank you for your time.

Steven B. Auerbach, MD, MP, FAAP  
Capt/06 | Senior Medical Epidemiologist, U.S. Public Health Service (retired)



On behalf of: New York Doctors Coalition | <https://www.nydocs.org/>

New York City Council Committee on Immigration

December 8, 2025, 10AM

Testimony of Wendy Barron, PhD

Thank you to the Committee on Immigration for holding this public hearing to address the urgent need to protect our immigrant communities in New York City. My name is Wendy Barron. I am urging you to pass the NYC Trust Act (Int 214-A Hanif) because I have seen first-hand the devastating impact of violations of New York Sanctuary Law upon my friends who are recent immigrants. Over the past two years I have been volunteering with mutual aid groups getting to know recent immigrants, particularly from West Africa. Through this work, I have been involved in forming community through shared meals and activities, as well as helping to coordinate needed legal, housing, and employment supports. Through this work, I have formed close relationships with many recent immigrants and have first-hand knowledge of their experience here, including ways they are impacted when local authorities unlawfully cooperate with Federal immigration agencies.

New York City's sanctuary laws have a long history of ensuring the safety of vulnerable immigrants. Ideally, Sanctuary Laws provide strict and necessary guidance for officials from various city agencies as to when and how they can cooperate with immigration authorities. However, the laws are only effective insofar as they are enforced and personnel are adequately trained. In the past year we have seen some officials in NYC, including from the NYPD, Department of Corrections, and ACS, unlawfully cooperate with federal immigration enforcement agencies, for example, providing details of the whereabouts of individuals which led to an unlawful arrest. In these cases, the immigrants whose rights have been violated have had no opportunity for recourse and the officials who wrongfully share immigrant information have not been held accountable.

Moreover, when immigrants perceive that local officials are cooperating with ICE, it creates fear and mistrust in immigrant communities. Fear of unlawful arrest keeps immigrants from their jobs, schools, places of worship, and shops, all of which creates emotional distress and destabilizes our economy. Many of my friends have told me that they have been afraid to go out of their place of residence at times. One young man who loves high school and is gifted in mathematics, was afraid to go to school, another, a young mother, was afraid to take the subway because she thought ICE may take her and separate her from her baby. Another man I know was afraid to go to a doctor when he was sick for fear of being detained.

This fear can have ripple effects on the larger community, for instance, an employer may lose worker time. If immigrants are afraid to go to work they may lose their jobs, meaning they will spend less in the local economy and also pay less taxes, and ultimately may need to turn to government or non-profit agencies for help, when otherwise they could be self-sufficient. Fear of engaging with medical providers may lead to the spread of untreated communicable illness or lower rates of vaccines which can endanger everyone. Yet another negative impact is that immigrants will see law enforcement as a threat and fear contacting them in emergencies or cooperating in addressing actual crime.

The NYC Trust Act (Int 214-A Hanif) makes violators of our Sanctuary Laws accountable for their actions by creating a private right of action against city agencies or officials that violate our Sanctuary Laws. This allows immigrant victims of these violations to seek justice. I believe this bill will prevent continued unlawful cooperation between local and federal agents and act as an incentive to uphold the law. I also believe that it sends a clear message to immigrants and the whole community that we value immigrants and will fight for their rights. For all the above reasons, I urge this Council to act swiftly to pass the NYC Trust Act (Int 214-A Hanif).

My name is Ximena Frankel, and I am a member of **Hand in Hand: The Domestic Employers Network**, a national organization of families, older adults, and disabled New Yorkers who employ care workers — including nannies, home care workers, and house cleaners.

Immigrant care workers, many of whom are undocumented, have green cards, or are naturalized citizens, are facing real threats. ICE continues to racially profile and collude with city agencies like the NYPD and Department of Corrections, putting families and workers at risk of detention, deportation, and family separation. These attacks don't just harm individuals, they **undermine the care systems we all rely on**.

As a naturalized citizen, an immigrant, a mother, the daughter of a former domestic worker, and current employer of a domestic worker, the safety of my community matters deeply to me. Seeing people being abducted, children separated from their parents, families torn apart, and fear terrorizing our immigrant communities is devastating. It creates a sense of fear amongst all of us— regardless of our immigration status— and chips away at our sense of safety in our city. The violation of our sanctuary city laws is utterly unacceptable and we must do everything we can to protect them— to protect ourselves and each other.

**That's why I'm here to urge passage of the NYC Trust Act (Intro 214).**

This bill would create a **private right of action**, allowing anyone whose rights are violated by city agencies to bring a lawsuit and hold those agencies accountable. Right now, violations of NYC's sanctuary laws happen regularly, including documented cases of the DOC and ACS sharing information with ICE, but there is **no clear way to enforce the law** or seek recourse.

Strong sanctuary protections are essential not only for immigrant safety, but for the **health and stability of our city as a whole**. When immigrant New Yorkers fear local agencies, it erodes trust, discourages reporting of crimes, and prevents families from accessing essential services. Passing the Trust Act ensures that **city agencies cannot violate these protections with impunity**, and that immigrant families can live without the constant fear of detention or separation.

I urge the City Council to act swiftly to pass the NYC Trust Act and protect the safety, dignity, and rights of immigrant New Yorkers. Thank you.

While I could submit thousands of words in support of the NYC Trust Act and Int 1412, two bills currently before your committee, I recognize that your time is limited so will keep my submission brief.

The reality is that none of the evidence I could cite or opinions I could share are as strong as the simple reality of the immigration landscape in New York City. My overwhelming experience as a citizen in this city is that members of our immigrant population—including those individuals without legal resident status—are responsible for an immeasurably positive impact on our community. I have not directly encountered a single person in my work as a volunteer or social worker across Manhattan and the Bronx who intends harm or poses a threat to the wellbeing of New York residents, whereas I have directly encountered upwards of a thousand workers, parents, and youth striving to make a contribution to the functioning of our society. The net influence on this city, state, and country is to lift us all up, reminding us of the nature of true struggle, as well as the power of resilience and hope. I can think of nothing we need more.

Those of us born in the United States have done nothing to earn the incredible gift of our birthright, and those of us who have pursued legal residence through the available channels understand all too well the impossibility for so many. So to criminalize anyone else for pursuing the same privilege can have no basis in any rational or moral principle. Accordingly, any reasonable measures to help protect our new neighbors—such as the NYC Trust Act and Int 1412—deserve the full council's support.

Thank you for your work, your time, and your consideration.

## Written Testimony NYC City Council Hearing on Immigration 8 Dec 2025

I am testifying/writing to support initiatives 214 and 1412. And after learning from the testimonies today, to also support 1272.

I am an individual of mixed descent, Mexican, Hungarian, Scots-Irish, all immigrants, and an educator in NYC public schools for 20 years.

I participate in court watch for immigration cases at places like Federal Plaza and the fear and terror I've witnessed as community members FOLLOW the law to show up for court, only to be terrorized with the possibilities and realities of being abducted, is reprehensible. Families with little children - it is gut wrenching. Knowing that ICE is showing up at NYC public schools is disgusting and devastating, and ofc anywhere else in NYC or the rest of the country.

The story I heard today of ACS colluding/sharing information via a request for therapy services is absolutely horrendous.

Thank you, mil gracias to council members Cabán and Hanif, and Aviles.

Financial restitution for those who have had their rights violated is a practical tactic to deter the collusion that goes against our sanctuary laws. The stories we have heard today are horrible. Thank you for holding DOC, NYPD, and other govt agencies accountable.

And I want to repeat the shaming of the lack of attendance of so called "public servants" to this hearing. Disgraceful. It IS a shame.

It was disturbing to hear that while not attending this hearing on immigration and protecting immigrant New Yorkers, the mayor's office is holding a press conference about language access, a performative action rather than practical support for immigrant communities under attack.

I look forward to the incoming Mamdani administration, since the current admin clearly does not have respect for even basic human rights. The election speaks for itself.

The TRUST Bill is an affront to the Constitution and does not consider the rights of Americans. It seeks to further degrade the federal protections enshrined in the constitution for preferences of radical local politicians. Please do not pass this horrific bill that will accelerate the already precarious path this City Council has put the city on.

### **Testimony on behalf of NYC TRUST Act**

The Republican Party has turned ICE into America's Gestapo, so it is vitally important that New York City's sanctuary city laws are followed and enforced to the letter. For example, if a City agency illegally shares data with ICE, the perpetrators of this crime should be held legally responsible. Individuals who have been harmed by the illegal actions of city agencies should certainly have the right to sue those agencies. Passing the NYC TRUST act would send a message that New York City will not be turned into Nazi Germany, as much as the Republican Party would like it to be.

Citywide, we can stop ICE's cruelty by ensuring [our sanctuary city laws](#) are actually followed. While it is illegal for City agencies to share data with ICE, this information-sharing continues—and the consequences for families are devastating. One mother, who traveled thousands of miles seeking safety with her children, asked shelter staff for help supporting her kids through their trauma. Instead, [staff from the Administration for Children's Services illegally shared her information with ICE](#), leading to her month-long detention and separation from her children.

I'm writing in support of the NYC TRUST Act—to finally enforce our sanctuary city laws by allowing individuals to sue when their rights are violated. Right now, there is no mechanism to hold City agencies accountable when they break the law.

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: DURGA SREENIVASAN

Address: [REDACTED] E 37th St

I represent: Livable Future Pkg & equal

Address: part

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name: Hadia Ali

Address: [REDACTED] Brooklyn, NY 11234

I represent: \* Livable Future Package

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. all Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Lacey Tauber

Address: \_\_\_\_\_

I represent: Brooklyn Borough President Antonio Reynoso

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12-08-21

(PLEASE PRINT)

Name: Amador by Foundation

Address: [REDACTED]

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/5/22

(PLEASE PRINT)

Name: Arash Azizzade

Address: [REDACTED] Brooklyn

I represent: Afghans For A Better Tomorrow

Address: [REDACTED] Brooklyn

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12-8-25

(PLEASE PRINT)

Name: David Moss

Address: \_\_\_\_\_

I represent: LEGAL DEFENSE FUND (PANEL)

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☒ in opposition

Date: 12-8-25

(PLEASE PRINT)

Name: Kader Guerrab

Address: [REDACTED] Brooklyn

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name: Brianna Abren

Address: 40 Worth, Suite 605, NYC, NY 10013

I represent: Center for Family Representation

Address: 40 Worth, Suite 605, NYC, NY 10013

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name: Jason Smith

Address: \_\_\_\_\_

I represent: NYS/LLC

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

12/8

I intend to appear and speak on Int. No. All Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Nat Moaghe

Address: 120 Wall St

I represent: Asian American Federation

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

12/8

I intend to appear and speak on Int. No. All Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Tsering Lama

Address: 71-07 Woodside Ave

I represent: Adhikar

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

12/8

I intend to appear and speak on Int. No. All Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Wai Yin Wong (Joyce)

Address: \_\_\_\_\_

I represent: Korean community services of Metropolitan New York

Address: 203-65 32nd Ave, Auburndale, NY 11361

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Dave Basnet

Address: New York Immigration Coalition

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 14/2/214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name: Deborah Lee

Address: \_\_\_\_\_

I represent: The Legal Aid Society

Address: 49 Thomas Street, NY, NY

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Muhammad Musah

Address: \_\_\_\_\_

I represent: African Communities Together

Address: (language access)

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. NY Trust Act Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name:

Address:

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name:

Address:

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name:

Address:

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1412 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12-10-25

(PLEASE PRINT)

Name: Karen Adelman

Address: [REDACTED] LIC NY 1901

I represent: New York City Bar Association

Address: 48 W. 44 St. NY NY

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214/11/12 Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Rosa Cohen-Creuz

Address: 360 E 161st St

I represent: The Bronx Defenders

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Brittany Brown

Address: 100 William St., 20th Fl.

I represent: New York County Defender Services

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 + 1412 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Zachary Ahmed

Address: [REDACTED] Astoria

I represent: New York Civil Liberties Union

Address: 123 Grand St., NY NY

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 + 1412 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: JOCHICATA MENG

Address: [REDACTED] BROOKLYN NY 10468

I represent: MEKONG NYC

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1268 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Samantha Sanchez

Address: [REDACTED] Queens, NY 11345

I represent: Common Cause NY

Address: 48 Wall Street

Please complete this card and return to the Sergeant-at-Arms

# THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/08/75

(PLEASE PRINT)

Name: Alejandro Gajales

Address: [REDACTED] Brooklyn, NY

I represent: Workers Justice Project

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 1113 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name: Ana Vera

Address: \_\_\_\_\_

I represent: New York State Youth Leadership Council

Address: \_\_\_\_\_

# THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: The Rev. Chloe Brenger

Address: [REDACTED]

I represent: The Infark Center of NY

Address: 475 Riverside Dr. Suite 540  
1046 10115

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: ALANA TORNELLO

Address: \_\_\_\_\_

I represent: HUMAN SERVICES COUNCIL

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Mile Herrera

Address: 245 23th Street Brooklyn

I represent: Mixteca

Address: 245 23 th Street

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 5214 Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name: Scott Foletta

Address: 317 Lenox Ave. New York, NY

I represent: Neighborhood Defender Service of Harlem

Address: 317 Lenox Ave New York, NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/08/2025

(PLEASE PRINT)

Name: HAOUKI Khadija

Address: 8 1077 Conely Island Avenue BK

I represent: Council of Peoples organization

Address: 1077 Conely Island Avenue BK

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Sellen Sanchez Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Leslie Allen

Address: 116 Nassau St NY, NY 10038

I represent: New York City Anti-Violence Project

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 244 etc Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Steve Averbach MD

Address: [REDACTED]

I represent: NY Doctors Coalition

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Yasmine Farhang, Immigrant Defense Project

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Tania Mattos

Address: \_\_\_\_\_

I represent: Unlocal

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Kelvin Servita Araujo Read by Rosa color-PRU

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 08/12/08/2025

(PLEASE PRINT)

Name: Mohammad RAZVI

Address: 1077 Coney Island Avenue BK

I represent: Council of people's organization

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name: Catherine Gonzalez

Address: \_\_\_\_\_

I represent: Brooklyn Defender Services  
Legal Service Provider

Address: 177 Livingston street, 7th fl, Brooklyn,  
NY 11201

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1412, 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8

(PLEASE PRINT)

Name: Michael Loeb

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Ajaclly Daimole 10

Address: [REDACTED] stree

I represent: Wixteca

Address: Brooklyn

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Hamador Bal

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: ACT

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name: Mina Farahmand

Address: [REDACTED]

I represent: Livable Future Package / New York

Address: city union of 5th ave

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 214 9142 Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 22-8

(PLEASE PRINT)

Name: ~~XXXXXXXXXX~~ Giovannetta Maragon

Address: [REDACTED] 10017

I represent: NYC-705A

Address: [REDACTED]

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: 14/8/25

(PLEASE PRINT)

Name: KC Wagner

Address: [REDACTED] NYC 10047

I represent: Hand in Hand

Address: \_\_\_\_\_

THE COUNCIL  
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Enika Lewis

Address: Corona Queens

I represent: Make The Road

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 11412 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Mahabuba Masud

Address: \_\_\_\_\_

I represent: New York Lawyers for the Public Interest

Address: 151 W 30th Street

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Manuel Castro

Address: \_\_\_\_\_

I represent: myself / personal

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 214 Res. No. \_\_\_\_\_

☒ in favor ☐ in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Glissa Bisoño

Address: Queens Village, NY 11428

I represent: Make the Road NY

Address: 164-19 Roosevelt Avenue  
Corona NY 11368

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/8/25

(PLEASE PRINT)

Name: Enrique Duran

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_



*Please complete this card and return to the Sergeant-at-Arms*



**THE COUNCIL  
THE CITY OF NEW YORK**

*Appearance Card*

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

☐ in favor ☐ in opposition

Date: 12/8/2025

(PLEASE PRINT)

Name: Raul Rivera

Address: \_\_\_\_\_

I represent: \_\_\_\_\_

Address: \_\_\_\_\_



*Please complete this card and return to the Sergeant-at-Arms*

