



ANTONIO R. VILLARAIGOSA
MAYOR

March 27, 2008

Secretary Michael Chertoff
U.S. Department of Homeland Security
Washington, DC 20528

Re: ICE Enforcement Priorities in Los Angeles


Dear Secretary Chertoff:

I write to request a thorough review and revision of the enforcement priorities of U.S. Immigration and Customs Enforcement (ICE) in Los Angeles. Together with the region's business leadership, I am gravely concerned that ICE's current apparent focus on non-exploitative employers in and around the City of Los Angeles could have severe and lasting effects on our local economy. As you can certainly appreciate, these concerns are heightened by the economic uncertainties that our city, like urban areas throughout the nation, is currently experiencing.

As Mayor of the City of Los Angeles, I have been an active and vocal proponent of comprehensive immigration reform. Together with my colleagues in the elected leadership of this city, I recognize that our local community includes a significant number of individuals whose immigration status calls into question their legal right to remain in the United States. Angelenos and Californians understand that significant sectors of our economy and community depend to a large degree on the contributions of these workers. My strong advocacy for comprehensive federal legislation that recognizes the long-term presence and contributions of many of these undocumented immigrants through some form of regularized presence and earned citizenship, stems in part from the firm conviction that a mass removal of these individuals is impractical and would severely disrupt the Los Angeles community and economy. The prevalent phenomenon of "mixed-status" families all but ensures this. At the same time, there can be no doubt that some such disruption must be tolerated in the service of a greater



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community good. For example, the removal of immigrants convicted of violent or other serious crime is an essential and needed boost to public safety and harmony in our City, as in any.

Recently, however, ICE worksite enforcement activities in the Los Angeles area have raised a number of concerns throughout the community, but in particular among many of our region's leading businesses. Enforcement actions have targeted established, responsible employers with deep and enduring roots in and contributions to Los Angeles community and economic development. These employers, in industries with a significant reliance on workforces that include undocumented immigrants, have been targeted despite having no record or suspicion of engagement in exploitative practices. In these industries, including most areas of manufacturing, even the most scrupulous and responsible employers have no choice but to rely on workers whose documentation, while facially valid, may raise questions about their lawful presence. Indeed, recognition of this unavoidable industrial reliance on undocumented workers underlies the support of many, including the Bush Administration, for comprehensive immigration reform.

In light of this acknowledged reliance, it seems nonsensical to expend limited ICE enforcement resources on non-exploitative employers in key industries. There is a real and unacceptable danger of driving such responsible employers outside the United States, further depleting our shrinking industrial base and severely harming the many citizen and legal immigrant workers and business owners who ultimately rely on these employers for economic survival. That is a national concern. As mayor of a major city, I must also be attentive to the danger of losing our regional economic base to other areas of this country. In that regard, I am concerned that ICE enforcement actions are creating an impression that this region is somehow less hospitable to these critical businesses than other regions, including some that seek to portray themselves as less susceptible to ICE enforcement actions. I know that such portrayals are ultimately false because our national industrial reliance on undocumented workers is simply too pervasive (thus supporting the need for federal reform legislation). Nonetheless, the impression that local ICE enforcement has created presents a serious dilemma that I ask you to address.

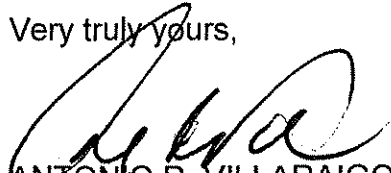
Furthermore, I urge you to adopt national ICE workplace enforcement priorities that focus on employers with a demonstrated history or reasonable suspicion of engagement in exploitative practices, such as violation of wage, hour, or occupational safety laws and regulations. These priorities should make clear that responsible employers need not fear that their workforce will be targeted before comprehensive immigration reform regularizes the status of workers on whom they, as a practical

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matter, must rely. Without such clear and articulated priorities, we risk doing serious and reverberating harm to our national economic base long before the comprehensive immigration reform that we commonly seek can ever take effect.

Thank you for your consideration of this critical matter. I look forward to hearing from you.

Very truly yours,



ANTONIO R. VILLARAIGOSA
Mayor

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cc: Julie L. Myers, Assistant Secretary, U.S. Immigration and Customs Enforcement
Eric Garcetti, Council President, City of Los Angeles
Gary L. Toebben, President and CEO, Los Angeles Area Chamber of Commerce