

STATE AND LOCAL POLICIES

I. INTRODUCTION

The introduction will provide a roadmap of the sections that comprise the Policies chapter. Section II will recap and expand upon the Board’s prior analysis of law enforcement use of emergent technologies, and how the use of certain technologies can contribute to — or reduce — racial and identity profiling or disparities. Section III will provide a brief overview of the U.S. Supreme Court order granting a stay application in *Noem v. Vasquez Perdomo*, where the Supreme Court stayed a district court injunction prohibiting federal agents from relying solely on a set of factors including race or ethnicity and speaking Spanish or speaking English with an accent to form reasonable suspicion for a detentive stop, and where Justice Kavanaugh, in a concurring opinion, writing only for himself, stated that in the Los Angeles area, apparent ethnicity can be a relevant factor establishing reasonable suspicion for an officer to stop an individual and inquire about immigration status — the so-called “Kavanaugh stop.” This section will discuss how California laws, such as RIPA and the California Values Act, prohibit state and local law enforcement officers from using Kavanaugh stops in their work. Section IV will build off last year’s analysis of stops of individuals with perceived limited English fluency by looking at what the data shows with respect to perceived lack of English fluency and race/ethnicity in terms of actions taken against individuals following the initial stop. Section V will look back at the eight largest law enforcement agencies in the state — the “Wave 1” agencies — that first began reporting their RIPA data beginning on July 1, 2018, and assess whether their adoption of RIPA Board recommendations resulted in any changes to their RIPA data. Finally, Section VI will provide recommendations based on research and data relating to policies that, if adopted, could reduce or eliminate racial and identity profiling or disparities going forward.

II. TECHNOLOGIES

A. ALPR Technology

The Board expressed concern in its 2026 Report that Automated License Plate Reader (ALPR) systems can be deployed to target communities of color and other marginalized populations. This section reviews ALPR’s expanding capabilities and uses and the potential for ALPR systems to increase racial disparities in police actions if ALPR cameras are disproportionately applied to communities of color. This section also discusses how federal immigration enforcement authorities may have access to California LEAs’ ALPR data, which raises the concern that federal immigration authorities may be using California agencies’ ALPR data to help target communities of color.

1. Expanding capabilities and uses

- Sahid et al., *Automated License Plate Readers, Market Survey Report* (June 2025) U.S. Department of Homeland Security and National Urban Security Technology Laboratory <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of xx, 2026]
 - This report offers a detailed description of the technology, its capabilities, and uses.
 - “With advances in machine learning, computer vision, and artificial intelligence (AI), ALPR systems now can read much more than license plates. ALPR software can detect dents on cars, search for specific bumper stickers, process specialty tags, and recognize rideshare logos.”

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- “ALPR software ranges in complexity from simple smartphone apps that read plates and compare them against user-generated hot lists to sophisticated systems that use machine learning and artificial intelligence to conduct complex analysis. The most sophisticated software can process images, read the plate number, determine the make, model, color and year of a vehicle, compare plates against local and national hot lists, make predictions on probable routes of travel, send localized alerts to law enforcement units in the area, automatically generate vehicle activity reports, and analyze system results to improve future system accuracy.”
- “ALPR is becoming a critical component in predictive policing, a practice which aims to use historic and real-time data to inform the allocation of police resources. For example, one southwestern U.S. city with high auto-theft rates had been able to track only the locations where cars were stolen and then recovered. By using ALPR data, the police became able to analyze the movements of the stolen cars and discovered a link between car thefts and drug users trading the stolen cars for drugs in an ad hoc underground economy. As a result, police resources were targeted to address both the car thieves and drug dealers that were facilitating the thefts”
- As AI features are being further integrated with ALPR, systems are becoming more capable of searching images for free-form information. In the same manner that one can now request a smartphone’s photo app to search for all images containing “dogs,” ALPR systems are gaining the capability to search all captured photos for, as an example, a “red truck with black toolbox mounted on the bed” or a “blue, 4-door hatchback with yellow smiley face bumper sticker.”
- “While hardware continues to improve, emerging ALPR technology focuses on the software in terms of computer vision, machine learning, AI, and image processing. AI is advancing applications such as real-time crime predication [sic].”
- “Some ALPR systems are capable of augmenting character recognition with vehicle recognition features including identifying vehicle make, model, color, and direction of travel. Using AI, the software analyzes either the full-frame image taken for plate recognition, or a separate photo taken specifically of the entire vehicle, comparing the shape and distinct features of the vehicle against a database of known vehicles. Some systems capture vehicle color information. The extracted make and model (and color, if applicable) of the vehicle in the photograph can be compared against hot lists or vehicle registration records to confirm the OCR data taken from the plate, assist in identifying vehicles with partial, obstructed, or missing plates, or assist in locating suspect vehicles where no plate information was obtained by witnesses.”
- Lipton, That Drone in the Sky Could Be Tracking Your Car, Electronic Frontier Foundation (Sept. 22, 2025) <<https://www.eff.org/deeplinks/2025/09/drone-sky-could-be-tracking-your-car>> [as of xx, 2026]
 - Emerging product/practice is ALPRs being installed on drones.
- Existing California law requires that a public agency that operates or intends to operate an ALPR system shall provide an opportunity for public comment at a regularly scheduled public meeting of the governing body of the public agency before implementing the program. (Civ. Code, §§ 1798.90.5-1798.90.55 (California rules related to ALPR).
 - But ALPR systems are changing; what the public may have had the opportunity to comment on before could be different from the technology a given agency is now using.

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2. How ALPR use can lead to racial disparities in law enforcement actions

This subsection recaps the 2026 Report information on ALPR cameras being concentrated on communities of color, with the attendant concern of disparate impact on such communities in terms of further police actions that may result from the use of ALPR cameras. *[If any more recent reporting or other writing on the subject is located, it will be included here as well. To date, none has been found.]*

California agencies' ALPR data may also be available to federal authorities. Federal immigration enforcement agencies have admitted to using perceived race or ethnicity or speaking Spanish or speaking English with an accent as factors contributing to “reasonable suspicion” for stops in Los Angeles County to investigate immigration status¹—which is a form of “racial profiling” as defined by RIPA, insofar as it is the consideration of perceived race, ethnicity, or national origin in deciding which persons to stop or deciding on the scope or substance of law enforcement policies following a stop.² Federal immigration agencies are also accused of racial profiling outside of Los Angeles County as well. Thus, there is a concern that federal immigration enforcement agencies have been using California LEAs' ALPR data in a campaign of federal policing that uses racial profiling.

Board members also discussed this issue at the March 19, 2026 subcommittee meeting. In that meeting, Board members noted that San Bernadino law enforcement agencies have reported that churches can connect their surveillance cameras to the police's system, but it is not clear what the capabilities and uses are, or whether the implications of this technology relate to racial profiling. Board members were also concerned about this data being shared with federal immigration agencies.

3. California ALPR Data in Federal Immigration Enforcement – Potential to contribute to racial profiling/disparities by federal enforcement agencies

Building on 2026 RIPA Report information, discussion of how information from California LEA ALPR systems can be shared with federal immigration enforcement authorities.

- Cites from 2026 RIPA Report, which could be cited again here:
 - Koebler and Cox, *ICE Taps into Nationwide AI-Enabled Camera Network, Data Shows* (May 27, 2025) <<https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>> [as of xx, 2026]
 - Chien, *SF, Oakland Cops Illegally Funneled License Plate Data to Feds* (July 17, 2025) *The San Francisco Standard* <<https://sfstandard.com/2025/07/14/oakland-san-francisco-ice-license-plate-readers/>> [as of xx, 2026]
- Center for Human Rights, University of Washington, *Leaving the Door Wide Open: Flock Surveillance Systems Expose Washington Data to Immigration Enforcement* (Oct.

¹ [Immigration Enforcement\Kristi NOEM Secretary of Homeland Security et al Applicants v Pedro Vasquez PERD.pdf](#) - *Noem v. Vasquez Perdomo* (S. Ct. No. 25A) Application to Stay the Order Issued by the United States District Court for the Central District of California and Request for an Immediate Administrative Stay (Jul. 11, 2025) 2025 WL 2323447.

² See Pen. Code, § 13519.4, subd. (e).

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21, 2025) <https://jsis.washington.edu/humanrights/2025/10/21/leaving-the-door-wide-open/#_ftnref65> [as of xx, 2026]

- Detailed reporting on ICE’s and CBP’s direct, side door, and back door access to Washington LEAs’ ALPR data for immigration enforcement
- Soicher, *Flock admits federal immigration agents have direct access to tracking data, despite previous claims* (Aug. 19, 2025) 9News <<https://www.9news.com/article/news/local/flock-federal-immigration-agents-access-tracking-data/73-a8ace742-56d4-4a57-b5bb-0373286dfef8?ref=404media.co>> [as of xx, 2026]
 - Discussing how a Flock technology pilot program had enabled DHS/CBP to obtain information sharing from local agencies for a period of time;
 - See also Faith Wardwell, Politico, *Liberal towns backtrack on license plate trackers amid concerns about privacy — and Trump* (Dec. 1, 2025) <<https://www.politico.com/news/2025/11/30/license-plate-trackers-pushback-00670550>> [as of xx, 2026] (corroborates reporting that Flock had a pilot program with DHS—since terminated—that customers (maybe unknowingly) opted into that let DHS have access to data).
- Solis, *Records: El Cajon license plate data used in nationwide immigration searches* (Oct. 9, 2025) KPBS <<https://www.kpbs.org/news/border-immigration/2025/10/08/records-el-cajon-license-plate-data-used-in-nationwide-immigration-searches>> [as of xx, 2026]
 - “Surveillance data collected by the El Cajon Police Department (ECPD) was used in immigration-related searches more than 550 times this year, according to a KPBS analysis of records from the city’s automated license plate reader (ALPR) system. The analysis shows that out-of-state police agencies routinely tap into data collected by El Cajon’s ALPR system for immigration-related searches – sometimes on behalf of federal agencies such as Immigration and Customs Enforcement (ICE).” “[T]he KPBS analysis shows that’s exactly what happened. Between January and July, police departments from Texas, Virginia, Kentucky, and other states tapped El Cajon’s system 574 times. Search terms included: “immigration,” “immigration violation,” “immigration enforcement” and “ICE assist.”
- Secure Justice, *Why Are The Alameda County Sheriff And SFPD Sharing So Much Data With 287(g) agencies?* (Dec. 7, 2025) <<https://secure-justice.org/blog/why-are-the-alameda-county-sheriff-and-sfpd-sharing-so-much-data-with-287g-agencies>> [as of xx, 2026]
 - “Among the more than 4,000 non-California agencies that received access to SFPD’s ALPR data in violation of SB 34, we estimate that at least 740 are formal members of the federal government’s 287(g) program—a program that deputizes local law enforcement to assist with immigration enforcement and deportation.”
 - “In Alameda County’s case, overall sharing volume on an annual basis is lower compared to San Francisco’s, but we currently estimate roughly 410 287(g) member agencies have been granted access.”
 - “Because the required purpose field is often missing or redacted, we cannot confirm the reason for each of the millions of annual third-party searches. And even where a purpose is present, it does not necessarily prove the purpose is truthful. Still, when

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- you find hundreds of thousands of searches by deportation-partner agencies into Californians’ plate data, it defies common sense to assume none relate to immigration enforcement . . . Searches performed for ICE or CBP have been widely reported.”
- Electronic Frontier Foundation, *San Jose Can Protect Immigrants by Ending Flock Surveillance System* (Feb. 12, 2026) <<https://www.eff.org/deeplinks/2026/02/op-ed-san-jose-can-protect-immigrants-ending-flock-surveillance-system>> [as of xx, 2026]
 - “[P]urported issues with the system’s software have enabled federal agencies to directly access California ALPR data”
 - “Just last week, police in Mountain View decided to turn off all of the city’s Flock cameras, following revelations that federal and other unauthorized agencies had accessed their network.”
 - “California law prohibits local police from disclosing ALPR data to out-of-state or federal agencies. But at least 75 California police agencies were sharing these records out-of-state as recently as 2023. Just last year, San Francisco police allowed access to out-of-state agencies and 19 searches were related to ICE. Even without direct access, ICE can exploit local ALPR systems. One investigation found more than 4,000 cases where police had made searches on behalf of federal law enforcement, including for immigration investigations.”
 - But see Chien, *California cops are breaking surveillance laws. Who’s going to stop them?* (Jul. 23, 2025) The San Francisco Standard <<https://sfstandard.com/2025/07/23/california-police-sharing-flock-license-plate-data/>> [as of xx, 2026]
 - “On Tuesday, Flock unveiled a separate feature in California that it says will automatically flag and block searches that include keywords like ‘immigration’ and ‘ICE.’ All state agencies were automatically opted into the feature, Beilin said.”

B. Technology-Assisted Body Worn Camera Footage Review

This section will look at the ways in which technology-assisted police body worn camera footage review might potentially be used to help reduce racial profiling and disparities.

1. Potential applications of alternative Enforcement Technologies to reduce racial profiling/disparities

- Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?* (Apr. 16, 2024) MIT Technology review <<https://www.technologyreview.com/2024/04/16/1090846/ai-police-body-cams-cops-transparency/>> [as of xx, 2026]
 - Discusses use of AI to transcribe BWC audio and to detect and notify police leadership of potential issues – accountability tool. System programmed to detect certain instances of certain types of statements/conduct and notify leadership by email of any instances detected.
 - Only police have access, which may limit utility as an accountability tool.
 - Commenter says police departments have little incentive to ask pointed questions about race, and the technology’s promise won’t be met if key terms, phrases, and interactions are not tagged.

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- Some police officers/unions don't want it because they believe it infringes on privacy and subjects them to more surveillance.
- Policing Project, New York University School of Law, *Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage* <<https://www.policingproject.org/rethinking-response-articles/2025/5/8/part-two-body-worn-camera-analytics>> [as of xx, 2026]
 - “It has become increasingly clear that the mere presence of cameras alone is not enough to drive meaningful change. Without the capacity to review and organize the footage, the potential benefits of BWCs are significantly limited. To address this issue, some agencies are turning to AI to help analyze BWC video, identify critical incidents, and provide insights that could improve police behavior and accountability.”
 - Discussion of potential benefits of AI analysis of BWC footage.
 - Washington State University's Complex Social Interactions Lab works with police departments by reviewing BWC footage and providing recommendations. With the assistance of AI, researchers analyze video to track factors such as the race of officers and people involved, whether officers explained their actions or commands, and whether force was used. AI then identifies correlations between these factors and the outcomes of each encounter. The Lab then shares its findings with police departments, helping to shape training standards and identify areas where policing practices can improve. For example, the Lab began its work partnering with the Pullman Police Department to analyze videos and train officers accordingly, and has since partnered with at least ten other law enforcement agencies at no cost. After analyzing thousands of hours of footage, the Lab found that interactions that don't end in violence are more likely when officers take the time to explain to community members what is happening.
 - Jurisdictions should set clear rules governing how agencies can use BWC analytics and should make clear that these tools, which are adopted for accountability purposes, cannot be repurposed for surveillance.
 - Data privacy is another critical concern. BWC footage often contains sensitive personal information — for example, an individual's address or phone number. To protect individual privacy, and because such information is not needed for BWC footage to serve accountability or research ends, any system or program that analyzes BWC footage should ensure personally identifiable information is redacted before it reaches human reviewers.
- Stanford Report, *Stanford summit explores AI's role in policing reform* (Oct. 23, 2024), Stanford <<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of xx, 2026]
 - Summit to explore to explore how AI analysis of body camera footage can improve policing, predict outcomes, and enhance public safety.
 - AI has helped researchers identify how officer words can significantly affect a traffic stop's outcome—e.g., handcuffing, searching, arresting—and black male drivers are more likely to be stopped and more likely to be handcuffed, searched, and arrested.
 - Not stated in the article as such, but the potential is there to reduce racially disparate impact of police stops by focusing officers on how different language impacts outcomes—consider in conjunction with evidence of racial disparities in officer

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- respect etc. [AI and BWCs\SPARQ - voigt et al. 2017 police language - officer respect disparities.pdf](#)); [AI and BWCs\SPARQ - camp et al. 2021.- the thin blue waveform - officer prosody disparities.pdf](#); see also [AI and BWCs\SPARQ - prabhakaran et al. 2018 institutional acts \(1\) - dialogue structures.pdf](#)
- University of South Carolina Department of Criminology and Criminal Justice, *Truleo Evaluation Experiment: Executive Summary* (Aug. 28, 2024) <<https://drive.google.com/file/d/1F8n7fchn9lNKLSY2y6VkfjntMv4TWTsN/view>> [as of xx, 2026]
 - Study showed that AI-assisted BWC footage review reduced the incidence of substandard professionalism or increased the incidence of highly professional behavior.
 - Camp. et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police* (2021) 121 J. of Personality and Social Psychology: Attitudes and Social Cognition 1157 <[AI and BWCs\SPARQ - camp et al. 2021.- the thin blue waveform - officer prosody disparities.pdf](#)> [as of xx, 2026].
 - Abstract: “How do routine police encounters build or undermine community trust, and how might they contribute to racial gaps in citizen perceptions of the police? Procedural justice theory posits that officers’ interpersonal communication toward the public plays a formative role, but experimental tests of this hypothesis have been constrained by the difficulties of measuring and manipulating this dimension of officer-citizen interactions. Officer-worn body camera recordings provide a novel means to overcome both of these challenges. Across five studies with laboratory and community samples, we use footage from traffic stops to examine how officers communicate to drivers and whether racial disparities in officers’ communication erode institutional trust in the police. Specifically, we consider the cumulative effects of one subtle interpersonal cue: an officer’s tone of voice. In Studies 1A, 1B, and 1C, participants rated thin slices of officer speech. Participants were blind to the content of the officer’s words and the race of their interlocutor, yet they evaluated officers’ tone toward White (vs. Black) men more positively. By manipulating participants’ exposure to repeated interactions, we demonstrate that even these paraverbal aspects of police interactions shape how citizens construe the police generally (Study 2), and that racial disparities in prosodic cues undermine trust in institutions such as police departments (Study 3). Participants’ trust in the police, and personal experiences of fairness, in turn, correlated with their perceptions of officer prosody across studies. Taken together, these data illustrate a cycle through which interpersonal aspects of police encounters erode institutional trust across race.”
 - Voight et al., *Language from police body camera footage shows racial disparities in officer respect* (Jun. 5, 2017) 114 PNAS No. 25 <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of xx, 2026]
 - Abstract: “Using footage from body-worn cameras, we analyze the respectfulness of police officer language toward white and black community members during routine traffic stops. We develop computational linguistic methods that extract levels of respect automatically from transcripts, informed by a thin-slicing study of participant ratings of officer utterances. We find that officers speak with consistently less respect toward black versus white community members, even after controlling for the race of

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the officer, the severity of the infraction, the location of the stop, and the outcome of the stop.”

- Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops* <<https://aclanthology.org/Q18-1033/>> [as of xx, 2026]
 - Abstract: “We apply computational dialog methods to police body-worn camera footage to model conversations between police officers and community members in traffic stops. Relying on the theory of institutional talk, we develop a labeling scheme for police speech during traffic stops, and a tagger to detect institutional dialog acts (Reasons, Searches, Offering Help) from transcribed text . . . We then develop speech recognition and segmentation algorithms to detect these acts at the stop level from raw camera audio . . . with even higher accuracy for crucial acts like conveying the reason for the stop). We demonstrate that the dialog structures produced by our tagger could reveal whether officers follow law enforcement norms like introducing themselves, explaining the reason for the stop, and asking permission for searches.”

C. Data Collection Analytics Products for Law Enforcement Agencies

Software used to report RIPA data can be used to show LEAs (and the public) their RIPA data in close to real time. At the March 19, 2026 Board meeting, Board members expressed interest in exploring how agencies — small and mid-sized in particular — can use RIPA data to improve outcomes. Board members posited that emergent technologies such as AI could also be used in this area. Board members also discussed how these developments relate to the Board’s desire to have RIPA data be actionable.

- Veritone Introduces Contact Analytics for California Law Enforcement to Enhance Real-Time Data Insights and Strengthen Public Trust (Jan. 9, 2025) <<https://www.veritone.com/newsroom/press-releases/contact-analytics/>> [as of xx, 2026]
 - “The introduction of Contact Analytics enables law enforcement agencies to gather near real-time analytics on their full repository of stop data at any time, rather than extract the data manually or wait for the CA DOJ to release its annual stop data analytics reports at the end of the calendar year.”
 - “Veritone Contact Analytics offers a range of features, including: On-demand, near real-time reporting to give agencies access to comprehensive stop data insights, eliminating delays and supporting informed decision-making. Customizable filters for viewing data by year, month, race, use of force and more. Detailed demographic breakdowns by race, gender, age and other key attributes. Comprehensive insights into reasons for stops, results, search data and use of force metrics.
 - Analytics for agency-specific custom questions, providing unique data points relevant to their operations.”
- Los Angeles County Sheriff’s Department, AB 953 - R.I.P.A Stop Data Information Dashboard <<https://lasd.org/transparency/ripa/>> [as of xx, 2026]
 - LA County Sheriff’s Department has a RIPA data information data dashboard that gives up-to-date numbers and statistics.
 - Website indicates you can run filters for call for service v. deputy-initiated, bicycle stop, vehicle stop, or pedestrian stop, station name, and city/area. Also a date range feature.
 - What technology is the department using to do this?

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1. Ability for LEAs (and the public) to run analytics, identify what might be causing disparities, and measure effects of policy/practice changes

Agencies that use such technology are in a better position to identify perceived racial and identity disparities that may be indicative of racial and identity profiling, as well as what might be causing observed disparities and how they might be addressed. Such agencies are likewise in a better position to assess what they are doing that might be helping to reduce perceived racial and identity disparities. In other words, using available and emerging vendor technologies can make it significantly easier for law enforcement agencies to actually make use of their RIPA data.

III. “KAVANAUGH STOPS” AND HOW CALIFORNIA LAW PROTECTS INDIVIDUALS FROM RACIAL AND IDENTITY PROFILING

This section will provide a brief overview of the SCOTUS order in *Noem v. Vasquez Perdomo* and discuss the combination of factors that immigrant enforcement agents can continue to use to stop an individual under the current posture of the case — i.e., what the district court had preliminarily enjoined before the Supreme Court stayed the preliminary injunction. The factors agents can use in combination are:

1. Apparent race or ethnicity
2. Speaking Spanish or speaking English with an accent
3. Presence at particular locations (bus stops, car washes, day laborer sites)
4. Type of work performed (day labor, construction, agriculture)

The section will also include articles with examples of Kavanaugh stops occurring in California and provide the reader with an understanding of the state laws that protect individuals from the improper use of such stops by state and local law enforcement officers. Because state and local law enforcement officers cannot initiate stops based on these factors, this section will highlight the need for clarity and consistency, paving the way for a recommendation that all California LEAs adopt RIPA’s definition of racial and identity profiling and that all officers be trained on the definition.

A. *Noem v. Vasquez Perdomo*

Noem v. Vasquez Perdomo involves a constitutional challenge to immigration enforcement in California. The case stems from the warrantless arrests of day laborers in Pasadena, California, and has proceeded through the Central District Court of California, Ninth Circuit Court of Appeals, and the Supreme Court of the United States.

Plaintiffs Pedro Vasquez Perdomo, Carlos Alexander Osorto, and Isaac Antonio Villegas Molina are all residents of Pasadena, California, who worked as day laborers.³ On June 18, 2025, Mr. Vasquez Perdomo, Mr. Osorto, and Mr. Villegas Molina were waiting at a bus stop in front of a donut shop in Pasadena to be picked up for a construction job.⁴ Four unmarked cars with tinted windows and no license plates abruptly surrounded them, and masked men with guns, including military-style weapons, appeared and ran toward them aggressively.⁵ The men wore regular

³ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656.

⁴ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

⁵ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

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clothes with no visible badges and did not identify themselves.⁶ Mr. Vasquez Perdomo tried to move away but was immediately surrounded, grabbed, handcuffed, and forced into a car.⁷ The men shared that they were afraid they were being kidnapped.⁸ The agents never showed warrants, never identified themselves as immigration officers, and never informed the plaintiffs of the basis for their arrests.⁹

The plaintiffs in the case — Mr. Vasquez Perdomo and the others who were detained — challenged their arrests and their treatment by the immigration agents, arguing the agents’ actions violated the Fourth Amendment’s prohibition against warrantless stops without reasonable suspicion. Although the lower courts found for the plaintiffs, the case made its way to the Supreme Court. On September 8, 2025, the Supreme Court granted the federal government’s application to stay the Fourth Amendment temporary restraining order,¹⁰ which for many “signaled [] support for ICE’s continued use of racial profiling in immigration policing.”¹¹

1. Chacón, *Whose Common Sense? Some Reflection on Noem v. Vazquez Perdomo*, *Border Criminologies* (Sept. 24, 2025) University of Oxford Faculty Law Blogs <<https://blogs.law.ox.ac.uk/border-criminologies-blog/blog-post/2025/09/whose-common-sense-some-reflections-noem-v-vazquez>> [as of XX, 2026]
 - “The majority provided no reasoning at all. The closest the Court came to providing reasons for its intervention came in the form of a non-precedential concurrence authored by Justice Kavanaugh. His legal reasoning focuses on two points.”
 - “First, he determined that the injunction was improper under the Supreme Court’s precedent in *City of Los Angeles v. Lyons*. In the 1983 *Lyons* decision, the Supreme Court struck down a lower court’s injunction against the Los Angeles Police Department’s (LAPD’s) use of chokeholds. The Court reasoned that there was no “real and immediate” threat that Mr. Lyons, who had already been unlawfully choked at the hands of the LAPD, would be subjected to a chokehold again. *Lyons* was a troubling case when it was decided, and many scholars have argued that it was wrongly decided. But even if one accepts (as we must) that *Lyons* is the law, it is not clear that the case should have been read to bar the relief that Judge Fripong ordered in Central District’s immigration enforcement case. Unlike the chokehold in *Lyons*, the race-based stops in Southern California are an ongoing and official ICE agency practice, not a one-off violation of agency practice. (Justice Sotomayor’s dissent stresses this distinction.). It may be that the majority of justices on the Supreme Court disagreed with the District Court’s extensively documented factual findings in this regard. But who can say?”
 - “Second, Justice Kavanaugh reasons that race-based stops are an essential and lawful element of immigration policing. He notes that such stops are brief and nonintrusive, and therefore can be supported on the basis of “reasonable suspicion” – a relatively low standard of proof.”

⁶ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

⁷ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

⁸ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

⁹ *Vasquez Perdomo v. Noem* (2025) 148 F.4th 656, 668.

¹⁰ [CITE] https://www.supremecourt.gov/opinions/24pdf/25a169_5h25.pdf

¹¹ Jennifer M. Chacón, *Whose Common Sense? Some Reflection on Noem v. Vazquez Perdomo*, *Border Criminologies*, University of Oxford Faculty Law Blogs, Sept. 24, 2025 <https://blogs.law.ox.ac.uk/border-criminologies-blog/blog-post/2025/09/whose-common-sense-some-reflections-noem-v-vazquez> [as of XX, 2026]

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2. Wise, *ICE Apprehension of US Citizens Derided as 'Kavanaugh Stops'* (Oct. 1, 2025) Bloomberg L. <<https://news.bloomberglaw.com/us-law-week/ice-apprehension-of-us-citizens-derided-as-kavanaugh-stops>> [as of XX, 2026]
 - “The Supreme Court effectively rubber stamped the executive branch’s practice of engaging in racial profiling, without any meaningful consideration of the harms that result from wrongful stops, arrests, detentions, and deportations,” said Elora Mukherjee, the director of Columbia Law School’s Immigrants’ Rights Clinic.”¹²
3. Fischer, *Sotomayor Faults Kavanaugh Over Immigration Stops Concurrence* (Apr. 7, 2026) Bloomberg L. <<https://news.bloomberglaw.com/us-law-week/sotomayor-faults-kavanaugh-over-immigration-stops-concurrence>> [as of XX, 2026]
 - Justice Sonia Sotomayor criticized Justice Brett Kavanaugh, without naming him, “for failing to grasp the real-world effects of an unsigned order last year that allowed immigration enforcement sweeps in Los Angeles to resume.” “I had a colleague in that case who wrote, you know, these are only temporary stops,” Sotomayor said, referencing Kavanaugh’s concurrence in *Noem v. Vazquez Perdomo*. “This is from a man whose parents were professionals. And probably doesn’t really know any person who works by the hour.” In his concurrence, Kavanaugh wrote “that legal residents’ encounters with immigration agents are ‘typically brief,’” failing to grasp, according to Sotomayor, that even short detentions can have major “financial consequences” for hourly workers.

B. Kavanaugh Stops

The term ‘Kavanaugh stop’ refers to an immigration enforcement stop justified by the factors discussed in *Noem v. Vazquez Perdomo* which according to Associate Justice Brett Kavanaugh, together create reasonable suspicion someone is “illegally present” in the United States.¹³

1. Chabria, *Detained Citizens Bravely Speak Up to Refute DHS Lie* (Dec. 14, 2025) L.A. Times <<https://www.latimes.com/california/story/2025-12-12/homeland-security-says-it-doesnt-detain-citizens-these-brave-california>> [as of xx, 2026]

Summary: In December 2025, the Los Angeles Times reported on the detention of U.S. citizens during immigration sweeps, refuting Department of Homeland Security claims otherwise. This article centers on the experiences of two California citizens who were arrested and detained in separate instances by masked agents in unmarked cars as they testified to the Senate Permanent Subcommittee on Investigations.

- “He handcuffed me without checking my ID. They ignored me as I repeated it again and again that I am a U.S. citizen,” she told committee members. “They did not care.”
- “Velez, still unsure who the man was who forced her into an SUV, managed to open the door and run to an LAPD officer, begging for help. But when the masked man noticed she was loose, he “ran up screaming, ‘She’s mine,’ “the congressional report says. The police officer sent her back to the unmarked car, beginning a 48-hour ordeal that ended with her being charged with assault of a federal officer.”

¹² Wise, *ICE Apprehension of US Citizens Derided as 'Kavanaugh Stops'* (Oct. 1, 2025) Bloomberg L. <<https://news.bloomberglaw.com/us-law-week/ice-apprehension-of-us-citizens-derided-as-kavanaugh-stops>> [as of XX, 2026]

¹³ *Noem v. Vazquez Perdomo*

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- “Javier Ramirez, born in San Bernardino, testified as “a proud American citizen who has never known the weight of a criminal record.” He’s a father of three who was working at his car lot in June when he noticed a strange SUV idling on his private property with a bunch of men inside. When he approached, they jumped out, armed with assault weapons, and grabbed him.”
2. Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days.* (Oct. 16, 2025) ProPublica <<https://www.propublica.org/article/immigration-dhs-american-citizens-arrested-detained-against-will>> [as of xx, 2026]

Summary: This article reports on a ProPublica investigation of more than 170 cases in which U.S. citizens who were detained by immigration enforcement agents. The investigation included information about cases from social media, lawsuits, court records, and journalist reports. The report found that more than 50 Americans were held after immigration agents questioned their citizenship; almost all of whom were Latino.

- “Americans have been dragged, tackled, beaten, tased and shot by immigration agents. They’ve had their necks kneeled on. They’ve been held outside in the rain while in their underwear. At least three citizens were pregnant when agents detained them. One of those women had already had the door of her home blown off while Department of Homeland Security Secretary Kristi Noem watched.”
 - “Among the citizens detained are nearly 20 children, including two with cancer.”
 - “We found more than 50 Americans who were held after agents questioned their citizenship. They were almost all Latino. These cases have often wilted under scrutiny.”
 - An American citizen who was questioned and held by DHS agents shared that “Kavanaugh’s assurances hold little weight for Garcia Venegas. He’s a U.S. citizen of Mexican descent, who speaks little English and works in construction. Even with his REAL ID and Social Security card in his wallet, Garcia Venegas worries that immigration agents will keep harassing him. ‘If they decide they want to detain you,’ he said. “You’re not going to get out of it.”
3. Ulloa, McCann & Medina, *I’m From Here!': U.S. Citizens Are Ending Up in Trump's Dragnet* (Sept. 29, 2025) N.Y. Times <<https://www.nytimes.com/2025/09/29/us/trump-immigration-agents-us-citizens.html>> [as of xx, 2026]

Summary: This article is the product of a New York Times review of publicly reported cases and court records of United States citizens being detained and questioned about citizenship status by immigration or local law enforcement officers. The article reports that at least 15 U.S. citizens were detained or arrested, with Latino men being targeted most frequently targeted. This article includes information about two Californians who were aggressively detained by Immigration and Customs Enforcement agents.

- “A review by The New York Times of publicly reported cases and court records found that since January, at least 15 U.S. citizens have been arrested or detained and questioned about their citizenship by immigration agents or local law enforcement officers enlisted to work with the federal authorities.”
- “Asked about the men’s cases, D.H.S. has said that Mr. Gavidia interfered with their enforcement operations and that Mr. Ramirez assaulted officers. But Mr. Gavidia was never charged, and a charge against Mr. Ramirez was dropped. Security videos of the incident reviewed by The Times do not show Mr. Ramirez assaulting officers.”

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- “I cannot work in peace anymore,” Mr. Venegas said in an interview. “I am always nervous.”
4. Hay, *Native Americans Say Tribal Members Harassed by Immigration Agents* (Jan. 30, 2025) Reuters <<https://www.reuters.com/world/us/native-americans-say-tribal-members-harassed-by-immigration-agents-2025-01-30/>> [as of xx, 2026]

Summary: This article reports on alleged immigration enforcement targeting and harassment of indigenous communities, despite Native Americans being granted United States citizenship in 1924. Native leaders report citizens being traumatized by federal officers in immigration raids.

- “Navajo Nation President Buu Nygren said his citizens have had "traumatizing" experiences with ICE agents, and U.S. Congressional Democrats called on Trump to stop the agency targeting Native Americans as it carried out immigration raids.”
- “Nygren, head of the United States' largest Native American reservation, is among indigenous leaders urging members to proactively carry state-issued identification cards and their Certificate of Indian Blood, an official U.S. document certifying a person has Native American ancestry.”

C. California Law

While federal law enforcement agents operate independently from California LEAs, California law provides protections for all people in California regardless of immigration status from racial and identity profiling during law enforcement operations.

1. How the Racial and Identity Profiling Act Prohibits the Use of Kavanaugh Stops

In this subsection, we will provide an explanation of how RIPA and its prohibition on racial and identity profiling serve to protect individuals from state and local law enforcement officers engaging in Kavanaugh stops.

Racial and Identity Profiling Act¹⁴ outlines comprehensive protections against law enforcement stops based on protected characteristics. RIPA defines “racial or identity profiling” as “the consideration of, or reliance on, to any degree, actual or perceived race, color, ethnicity, national origin, age, religion, gender identity or expression, sexual orientation, or mental or physical disability in deciding which persons to subject to a stop or in deciding upon the scope or substance of law enforcement activities following a stop.” This prohibition against racial and identity applies to all law enforcement activities including traffic stops, pedestrian stops, questioning, searches, and arrests, except when officers rely on characteristics listed in a specific suspect description.¹⁵

A potential tension arises between RIPA’s complete prohibition on racial and identity profiling and SB 54’s authorization to participate in joint task forces with federal law enforcement agents. Because federal law enforcement agents may now consider race and ethnicity among other factors when performing Kavanaugh stops, it raises questions about whether California LEAs can meaningfully adhere to RIPA when others in the same task force are now allowed to racially profile.

¹⁴ Codified in Pen. Code, §13519.4

¹⁵ Pen. Code, §13519.4 subd. (e)

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2. The California Values Act and Joint Law Enforcement Task Forces

Board members expressed interest in exploring the potential risk of racial profiling by California law enforcement officers that may be created by allowing California agencies to participate in joint task forces with federal law enforcement agencies, given the federal government's practice (and defense) of racial profiling reflected in the *Vazquez Perdomo* case.

In relevant part, the California Values Act (SB 54)¹⁶ generally prohibits California law enforcement agencies (LEAs) from using agency personnel to investigate, interrogate, detain, detect, or arrest persons for immigration enforcement purposes.¹⁷ Provided the activity does not violate any policy of the agency or any law or policy of the jurisdiction in which the agency is operating, SB 54's general immigration enforcement prohibition does not prevent an agency from conducting enforcement or investigative duties associated with a "joint law enforcement task force"—which, by definition, includes at least one federal law enforcement agency¹⁸—provided the following conditions are met: (a) the joint task force's primary purpose is not immigration enforcement; (b) the enforcement or investigative duties are primarily related to a violation of state or federal law unrelated to immigration enforcement; and, (c) participation in the joint task force does not violate any local law or policy to which it is otherwise subject.¹⁹

.Because federal law enforcement agencies have been considering perceived race or ethnicity, or a person's speaking Spanish or speaking English with an accent, as factors establishing reasonable suspicion to conduct a stop to investigate a person's immigration status, Board members are concerned by the risk that California officers may face difficulty in adhering to RIPA when a federal agency(ies) in the same task force may be engaging in such racial or identify profiling .Based on the Board's discussion, this section could note that there is no exception in RIPA for agencies/officers participating in joint task forces, and that there is language in SB 54 that would appear to prohibit participation in a joint task force if it entailed CA officers being involved in racial profiling in violation of agency or local jurisdiction policy, which police should include the RIPA prohibition on racial profiling.

Next, the section can note that the issue may be taking on greater salience because, as to joint law enforcement task forces in which California agencies are participating, 2025 saw a marked increase in the number of arrests made by participants in such joint task forces reported as being made for immigration enforcement purposes. In 2022, the total number of arrests made by joint law enforcement task forces with California agency participation was 14,163. The total number of arrests made for the purpose of immigration enforcement by task force participants in 2022 was 1. The total number of arrests made by joint law enforcement task forces in 2023 was 13,760. The total number of arrests made for the purpose of immigration enforcement by task force participants in 2023 was 0. In 2024, the total number of arrests reported by California LEAs for joint law enforcement task forces in which they participated was 18,085. The total number of arrests reported for the purpose of immigration enforcement by task force participants in 2024 was 12. In 2025, the total number of arrests reported by California LEAs for joint law enforcement task forces in which they participated was 16,613. The total number of arrests reported for the purpose of immigration enforcement by task force participants in 2025 was 300.

¹⁶ SB 54 was signed into law on October 5, 2017, and went into effect January 1, 2018

¹⁷ Gov. Code, § 7284.6, subd. (a).

¹⁸ Gov. Code, § 7284.4, subd. (g).

¹⁹ Gov. Code, § 7284.6, subd. (b)(3).

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1. Huss, *Overtime pay and night vision binoculars: UC San Diego is among agencies helping patrol border* (Feb. 10, 2026) CalMatters <<https://calmatters.org/education/2026/02/uc-san-diego-homeland-security-border-patrol/>> [as of xx, 2026]

- “Operation Stonegarden is a DHS program providing \$10.9 million annually to dozens of California law enforcement agencies to collaborate with Border Patrol. “Police departments usually spend the money on overtime pay for officers to carry out operations for Customs and Border Protection. The money can also pay for a wide range of surveillance equipment, from search cameras and devices that transmit their data, to facial and license plate recognition software. Three California counties — Imperial, San Diego and Riverside — accept the grant and distribute it to police forces in their area.”
- “The Riverside County Sheriff’s Department provided several reports through a California Public Records Act request. The reports show that while carrying out Stonegarden operations, the department frequently made traffic stops in 2023 and 2024, working collaboratively with Border Patrol personnel. Most of the stops led to no arrests, citations or drug seizures. Instead, the stops resulted in ‘intel development,’ meaning federal intelligence was developed regarding interactions between civilians and cops during those stops even when no crime was committed.”
- “Dobbins added that the UC San Diego police department focuses on safety and security rather than immigration enforcement. ‘We are prohibited from even asking immigration status or enforcing immigration law. So that’s not part of our duties, and we don’t even ask about it,’ he said. Lately, he added, there’s ‘more of an emphasis on that, as a reminder that that’s not what our mission is.’”
- Researcher says grant emphasis switches back and forth between drug trafficking and immigration arrests. “Several agencies across the country have quietly stopped participating in Stonegarden over the years, citing concerns about racial profiling, protecting asylum seekers, and endangering Latino communities.”

2. Agreement for the Fiscal Year 2024 Operation Stonegarden Grant Program, 2024-2027 submitted to Imperial City Council <https://www.cityofimperial.org/sites/default/files/agendas/council/CC07-16-25_Item-B4.pdf> [as of xx, 2026]

- MOU provides that City (and other listed cities and counties and CHP) agencies will provide grant activities by increasing law enforcement presence in order to support CBP and OBP efforts to improve border security
- “Parties will enforce local and state laws within the agency’s jurisdiction and will not enforce immigration laws on behalf of CBP/OBP.”
- Parties will conduct grant activities consistent with Values Act: Primary purpose of grant activities will not be immigration enforcement as defined in Gov. Code 7284.4, subd. (f); enforcement or investigative duties will be primarily related to a violation of state or federal law unrelated to immigration enforcement. Term is 9/24 to 5/31/27.
- Goals and missions are set forth in Exhibit A, CBP’s Operations Order Report,” which is not included, and which is described as being exempt from public disclosure under federal and state law.
- Parties will provide enhanced enforcement by increasing patrol presence in proximity to the border and/or routes of ingress from the border; use investigative and prosecutorial areas of expertise in operations targeting “criminal aliens” upon reasonable suspicion of,

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or violation of, 8 USC 1326(a)²⁰ that may be subject to enhancement specified in 8 USC 1326(b)(2)²¹ if detected during an unrelated law enforcement activity, to document for fraud, and for intelligence development, including making necessary inquiries as permitted by Gov. Code 7284.6, subd. (b). Parties shall increase intelligence sharing among each other

3. Nichols, *Separating Fact from Fiction on California’s Sanctuary State Law* (Aug. 1, 2018) PolitiFact <<https://www.politifact.com/article/2018/aug/01/separating-fact-fiction-californias-sanctuary-stat/>> [as of xx, 2026]
 - “SB 54 prohibits local and state law enforcement from using their resources, including personnel or facilities, to investigate or arrest people for federal immigration enforcement purposes.”
 - “SB 54 gives law enforcement discretion to work with federal immigration authorities when undocumented Californians are charged with any of the hundreds of serious crimes listed in the Trust Act. Those include assault, battery, sexual abuse and exploitation, rape, crimes endangering children, burglary, robbery, theft, fraud, forgery, a crime resulting in death, and many more. McClintock’s statement gives the wrong impression that local police and sheriff’s deputies have their hands tied for all offenses.”
4. California DOJ SB 54 Reports - Reports are available here <https://openjustice.doj.ca.gov/resources/publications> and go back to 2018.
 - California Dept. of Justice, *California Values Act (SB 54) Report* (2022) <<https://data-openjustice.doj.ca.gov/sites/default/files/2023-03/sb54-report-2022.pdf>> [as of xx, 2026]
 - California Dept. of Justice, *California Values Act (SB 54) Report* (2023) <[https://data-openjustice.doj.ca.gov/sites/default/files/2024-03/SB 54 Values Act Report 2023.pdf](https://data-openjustice.doj.ca.gov/sites/default/files/2024-03/SB%2054%20Values%20Act%20Report%202023.pdf)> [as of xx, 2026]
 - California Dept. of Justice, *California Values Act (SB 54) Report* (2024) <<https://data-openjustice.doj.ca.gov/sites/default/files/2025-02/sb54-values-act-report-2024.pdf>> [as of xx, 2026]
 - California Dept. of Justice, *California Values Act (SB 54) Report* (2025) <<https://data-openjustice.doj.ca.gov/sites/default/files/2026-02/sb-54-values-act-report-2025.pdf>> [as of xx, 2026]

IV. DISPARITIES IN POST-STOP ACTIONS RELATING TO ENGLISH FLUENCY

A. What Does RIPA Data Show

This section will build off last year’s analysis of stops of individuals with perceived English fluency by looking at what the data shows with respect to perceived language and race/ethnicity. We will look at stops where officers perceived individuals as having limited/no English fluency and examine whether there are differences across perceived racial and ethnic groups across different data elements, including actions taken, whether force was used, the outcome of the stop, and the duration of the stop. We can run this analysis for prior years to determine whether there

²⁰ 8 USC 1326(a) generally makes it a crime for a person who has been denied admission, excluded, deported, or removed or has departed the United States while an order of exclusion, deportation, or removal is outstanding, to enter, attempt to enter, or be found in the U.S.

²¹ 8 USC 1326(b)(2) provides an enhanced penalty for a violation of 8 USC 1326(a) for a person whose removal was subsequent to a conviction for commission of an aggravated felony.

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are any changes over time that may be reflected in the data. The hypothesis being explored is that, for some groups, having limited English (as perceived by the officer) may have a disparate adverse impact—i.e., that having limited English may increase the likelihood of certain adverse actions being taken against members of one racial group more than it increases the likelihood of such actions being taken against members of other racial groups.

1. Krueger, *Barriers to Justice: How Spanish-Speaking Suspects Are at Risk During Police Interrogations* (June 8, 2018) NBC 7 San Diego <<https://www.nbcsandiego.com/news/local/barriers-to-justice-how-spanish-speaking-suspects-are-at-risk-during-police-interrogations/148314/>> [as of xx, 2026]

Summary: This article reports on a case study in which a non-certified bilingual officer in the San Diego Police Department misrepresented an individual's testimony, leading to a dismissal of important statements. The report exposes a broader concern that non-English speakers are at risk of being misunderstood in interrogations, potentially leading to wrongful arrests or mistrials.

- "But Banda's lawyer told NBC 7 Investigates that problems with the interpretation of Banda's answers to a detective's questioning and Banda's efforts to make it clear that he was not the driver, caused a rush to judgment by police and prosecutors."
 - "Defense attorney Juliana Humphrey told NBC 7 Investigates that doubts about the accuracy of the interpretations were a cornerstone of her successful defense during two trials, both of which ended with hung juries."
 - ""It was a disservice to have a translator, a police officer, who wasn't certified, and who doesn't speak Spanish perfectly, translating for a guy whose life is on the line," Castanares said."
 - "Colombo said a faulty interpretation by U.S. Customs agents led to the wrongful arrest and trial of his client, a Spanish-speaking farmer living legally in the U.S."
2. *Bilingual SF Police Officers Cannot Always Be Found When Needed* (Jan. 28, 2015) S.F. Examiner <<https://www.sfexaminer.com/news/bilingual-sf-police-officers-cannot-always-be-found-when-needed>> [as of xx, 2026]

Summary: This San Francisco Examiner article exposes the shortage of bilingual police officers in the San Francisco Police Department, which has resulted in instances where non-English speaking residents lack necessary assistance during emergencies. There are significant gaps in language proficiencies in neighborhoods including Chinatown and the Mission District where there are large populations of non-English speakers. The article argues that these gaps have resulted in incidents where police are unable to speak to witnesses and wrongful arrests due to an inability to communicate.

- ""There weren't any bilingual officers on scene,' Chiu said late last year, months after the Sept. 22 incident, adding that staffers from his office rushed to find people who could translate for the Cantonese-speaking witnesses. Despite those efforts, Chiu said, 'there were many witnesses that walked away.'"
 - "Mejia, who was the one who reported the domestic violence, ended up being arrested because the officers mistook the defensive scratching on the father as evidence that Mejia attacked him. While she was eventually reunited with her children and the father moved out, she did have to spend a night in jail."
3. ACLU of Northern California, *Siskiyou County Settles Claims Over Race-Based Traffic Stops, Agrees to Major Reform* (Dec. 29, 2025) <<https://www.aclunorcal.org/press-releases/page/>> [as of xx, 2026]

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Summary: The press release shares information about a partial settlement in a civil rights class action lawsuit against Siskiyou County and Siskiyou Sheriff's Office, which had been systematically discriminating against Asian American residents in traffic stops. As part of the required traffic stop reforms included in this agreement, new procedure policies seek to prevent Sheriffs from pressuring individuals into consenting to searches by requiring that there is reasonable suspicion or probable cause of a violation, advising individuals of their right to refuse, and providing interpreters for non-English speakers.

4. Shah, Rahman, and Khashu, *Overcoming Language Barriers: Solutions for Law Enforcement* (2007) New York: Vera Institute of Justice <<https://niwaplibrary.wcl.american.edu/wp-content/uploads/Overcoming-Language-Barriers-for-Law-Enforcement.pdf>> [as of xx, 2026]

Summary: This national report explores how law enforcement agencies can bridge language gaps with growing populations of individuals with limited English-proficiency. The report highlights the importance of implementing programs to build trust between law enforcement personnel and these communities that frequently fear police presence. The report suggests the implementation of strategies including recruiting bilingual staff, utilizing telephonic interpreters, and establishing community partnerships to build trust. The report includes a case study of the “Translating Justice” Program implemented in Anaheim Police Department.

- “The obstacles associated with language barriers are often complicated by the fact that many LEP persons fear the police and go to great lengths to avoid contact with them. Especially in a political environment where immigrants’ legal status is a prominent issue of national debate, more and more immigrants—particularly those who do not speak fluent English—are staying away from public services and government institutions.”
- “Achieving this kind of relationship presumes effective and open communication between officers and residents, including those who are not fluent in English. The task of communicating and developing trust with LEP individuals may seem especially formidable, yet many law enforcement agencies are figuring out how to do this.”

V. WAVE 1 AGENCIES LOOK BACK

In this section, we will assess the viability of a longitudinal review of Wave 1 agencies’ disparities in perceived racial and identity characteristics by looking at particular RIPA data elements — e.g., stops, consent search requests, use of force, or stop outcomes. For any agency showing a significant reduction in racial disparities at a point in time or as a trend over time, an effort would be made to try to identify whether the agency made any change(s) that might explain the reduction — e.g., a change(s) in policy, practice, training, deployment, etc. Through this exercise, the Board might be able to identify actions agencies have taken that appear to have worked to reduce racial disparities, including actions the Board may have recommended in past reports.

VI. POLICY RECOMMENDATIONS

[Area for Subcommittee and Board discussion]

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