



CASA Testimony in SUPPORT of Senate Bill 828
Immigration Enforcement - Sensitive Locations - Guidelines and Policies (Protecting Sensitive Locations Act)

House Judiciary Committee

March 26, 2025

Dear Honorable Chair Clippinger, Vice Chair Bartlett, and Members of the Committee,

CASA strongly supports Senate Bill 828, the Protecting Sensitive Locations Act. CASA is a national organization building power and improving the quality of life in working-class: Black, Latino/a/e, Afro-descendent, Indigenous, and Immigrant communities.

With a membership of over 173,000 members, CASA creates change with its power-building model, blending human services, community organizing, and advocacy to serve the full spectrum of the needs, dreams, and aspirations of its members. For nearly forty years, CASA has employed grassroots community organizing and high-quality services that ensure families can access essential public benefits that provide basic necessities.

The Urgent Need for the Protecting Sensitive Locations Act

The Protecting Sensitive Locations Act is a crucial step toward ensuring unhindered access to essential services and spaces by limiting Immigration and Customs Enforcement (ICE) activities in sensitive locations. This legislation affirms Maryland's commitment to dignity, safety, and community by ensuring that all people, regardless of immigration status, can access healthcare, education, and critical resources without fear or intimidation.

For over a decade, federal policy¹ restricted Immigration and Customs Enforcement (ICE) activities in sensitive locations—such as hospitals, schools, and more—to prevent intimidation and maintain access to critical services. However, as of January 20, 2025, these protections have been revoked², leaving immigrant communities vulnerable to enforcement actions in places

¹

https://www.dhs.gov/sites/default/files/publications/21_1027_opa_guidelines-enforcement-actions-in-near-protected-areas.pdf

²

<https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse>

where they should feel safe.

This policy shift has already created an environment of fear and uncertainty, discouraging individuals from seeking medical care, pursuing education, accessing legal resources, or engaging with law enforcement. As a result, our communities, public health, and overall safety are at risk. The Trump administration has declared a massive escalation in ICE enforcement actions, creating widespread panic among immigrant communities—even beyond those who are undocumented.

The Impact on CASA and Our Community

As one of the largest multi-service providers in the state, CASA has had to alter our service delivery model in response to legitimate community concerns about possible enforcement actions at CASA facilities.

Previously, CASA was known for large-scale clinic-style service events that brought together staff and volunteers to provide critical services such as tax preparation, health screenings, and assistance with U.S. citizenship applications. Due to security concerns, these events have been significantly reduced in scope.

This chilling effect has been compounded by anti-immigrant rhetoric from the White House and highly publicized ICE enforcement actions. As a result, we have seen a decrease in participation in government services—including during the current tax season. Conversely, there has been a dramatic increase in demand for remote services such as our trilingual social services hotline (assisting individuals in navigating available resources) and our ICE Activity & Raid tip line (ensuring individuals know their rights and are connected to legal assistance).

Every day, we hear from immigrant families across the state who are afraid to visit a doctor, take their children to school, or even step outside for fear of ICE enforcement. If left unaddressed, these fears will lead to increased school dropout rates and lower vaccination rates, potentially undermining our entire public health infrastructure—as we saw during the COVID-19 pandemic.

The Reality of ICE Enforcement at Sensitive Locations

Through our Raid Tip Line, which serves the DMV region, we have gathered substantial evidence of ICE's enforcement tactics, including:

- Surveillance of individuals as they travel to work, attend events, visit courthouses, or drop their children off at school
- “Collateral” arrests of individuals with no prior criminal record—detained simply for being in the wrong place at the wrong time.
- Intelligence-gathering operations targeting community members engaged in everyday activities.

With federal restrictions lifted, ICE and other enforcement agencies now operate unchecked in churches, social service providers, schools, and other critical spaces.

ICE Enforcement at Sensitive Locations In Maryland and Beyond

The impact of ICE enforcement in sensitive locations is not hypothetical—it is a devastating reality that has separated families, deterred individuals from accessing essential services, and created a climate of fear across Maryland and the nation.

We have already seen what ICE enforcement in sensitive locations looks like.

In 2017, Jesus Peraza was arrested near Hampstead Hill Elementary School in Baltimore City just moments after dropping off his ten-year-old son.³ Despite having no criminal record, he was detained and deported. His pregnant wife, nine months along, and their young son were left behind, their family torn apart. The arrest sent shockwaves through the community - this incident occurred even after the Baltimore City Council passed a resolution condemning ICE actions in sensitive locations⁴.

The fear ICE creates in sensitive locations is not limited to Maryland.

In Texas, two parents were arrested by ICE while bringing their infant son to a hospital for emergency surgery.⁵ A ten-year-old girl, Rosa Maria Hernandez, who suffers from cerebral palsy, was taken into ICE custody directly after undergoing emergency gallbladder surgery.⁶ A father in Los Angeles, Avelica-Gonzalez, was pulled over and arrested just minutes after dropping his daughter off at school, his 14-year-old child recording the encounter in tears⁷. And in Texas, a woman seeking a protective order from her abusive partner was arrested inside a courthouse⁸.

These stories are not anomalies. They are the inevitable result of policies that allow ICE to operate without restriction, spreading fear and discouraging people from engaging with critical services.

The Consequences for Schools, Courthouses, Faith Spaces, and Healthcare Facilities

The locations listed in Senate Bill 828 are not just buildings—they are lifelines that allow people

³ <https://www.wbalv.com/article/baltimore-man-with-no-criminal-record-at-risk-of-deportation/9962078>

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<https://baltimore.legistar.com/LegislationDetail.aspx?ID=2987706&GUID=52037C73-1A16-4115-9829-89A502526FE4&Options=&Search=&FullText=1>

⁵ <https://www.npr.org/2017/09/20/552339976/border-patrol-arrests-parents-while-infant-awaits-serious-operation>

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<https://www.washingtonpost.com/news/post-nation/wp/2017/10/26/a-10-year-old-immigrant-was-rushed-to-the-hospital-in-an-ambulance-she-was-detained-on-the-way/>

⁷ <https://www.latimes.com/local/lanow/la-me-romulo-avelica-deportation-20170731-story.html>

⁸ <https://www.elpasotimes.com/story/news/2017/02/15/ice-detains-domestic-violence-victim-court/97965624/>

to meet their basic human needs. Whether it is seeking medical care, attending school, practicing their faith, or accessing the justice system, no one should be forced to choose between safety and survival.

Schools should be safe spaces for learning, yet ICE enforcement has led to absenteeism, learning disruptions, and increased anxiety among students. A Baltimore principal testified in 2019 that school attendance dropped following ICE enforcement actions in the area. When parents fear school drop-off could lead to detention, children suffer, communities suffer, and ultimately, our education system suffers.

Courthouses are critical spaces that should never be battlegrounds for immigration enforcement. Victims of domestic violence already face significant barriers when seeking protective orders, and the threat of ICE presence makes it even less likely that they will report abuse. When ICE targets immigrants in courtrooms, criminals and abusers are emboldened, knowing their victims are too afraid to seek justice. In Maryland, Attorney General Brian Frosh recognized this danger, joining a multi-state coalition in 2020 to halt immigration arrests at courthouses⁹. Even law enforcement officials have spoken out against this, recognizing that ICE arrests in courthouses actively obstruct justice.

Faith spaces have long been places of refuge, healing, and community. Historically, places of worship have been a safe haven for those in need, regardless of immigration status. But when ICE enforces removals outside of churches and religious shelters, it violates the sanctity of these spaces and prevents people from accessing spiritual support and communal care. Worshippers should not have to fear that attending a religious service could put them or their loved ones at risk.

Hospitals and healthcare facilities should be places of healing, not fear. Maryland has worked tirelessly to expand healthcare access, but ICE enforcement undermines these efforts. When patients fear arrest for seeking medical care, they avoid hospitals, leading to higher rates of preventable illnesses, lower vaccination rates, and increased public health risks for everyone.

The Need for Uniform Guidance

To date, CASA has conducted dozens of training sessions for hundreds of social service providers, teachers, and clergy members, all of whom are seeking urgent guidance on how to protect their communities from the devastating impact of immigration enforcement actions. While these trainings have been invaluable, they are not a substitute for consistent, enforceable policies that apply across all settings. **The need for clear, uniform guidelines is undeniable, and only the Attorney General's office can provide the authoritative direction necessary to ensure that schools, faith spaces, healthcare facilities, and courthouses remain safe and**

⁹ <https://www.marylandattorneygeneral.gov/press/2020/011720.pdf>

accessible for all.

IMPORTANT: CASA is concerned about the amendments made to HB1006, which was amended to HB579. We strongly support the passage of SB828, rather than HB579 - which aligns more closely with the goals and intent of the Sensitive Locations Act.

- Most notably, the amended bill removes any requirement that sensitive locations actually implement the guidance provided. This renders the guidance effectively optional and undermines the purpose of the bill. Without enforceable mandates, the protections intended by the legislation may not be realized in practice.
- Additionally, several elements required in the guidance—such as subsections (B)(1), (B)(2), and likely (B)(7)—do not involve strictly legal interpretations. It is understandable that the Attorney General may be reluctant to engage in those areas, given their nature. Furthermore, subsection (B)(5), which addresses collateral enforcement, appears to miss the core issue. While we recognize that the bill may be attempting to address deeply harmful practices, many of these actions unfortunately fall under recognized exceptions to the Fourth Amendment. The key concern should be ensuring that enforcement actions do not extend beyond the authorized scope of a warrant.
- We also note that courthouses are not included as sensitive locations under the current language. This is a significant omission and one we urge the Committee to address.

Senate Bill 828 is about preserving the integrity of Maryland's institutions and ensuring that every person can access essential services without fear of being torn from their family. No person should have to choose between their safety and their basic needs. For all the reasons listed above, **CASA urges a favorable report on Senate Bill 828.**

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