

1 Justin G. Reden, Esq. (SBN 230068)
REDEN | RIDDELL
16885 Via Del Campo Court, Suite 320
2 San Diego, CA 92127
(619) 758-3869
3 *jreden@redenriddell.com*

4 Richard Lawson, Esq. (Florida Bar No. 165085) *pro hac vice forthcoming*
America First Policy Institute
5 1455 Pennsylvania Ave., N.W., Suite 225
Washington, D.C. 20004
6 (703) 637-3690
rlawson@americafirstpolicy.com

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8 Attorneys for Plaintiff,
CITY OF EL CAJON

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO - EAST COUNTY DIVISION**

11
12 CITY OF EL CAJON, a charter city and
municipal corporation,

13 Plaintiff,

14 vs.

15
16 ROB BONTA, an individual; ATTORNEY
GENERAL OF CALIFORNIA, in his official
17 capacity as the ATTORNEY GENERAL OF
THE STATE OF CALIFORNIA; DOES 1
18 through 100, inclusive,

19 Defendants.
20

Case No.

**COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

21
22 This Complaint for Declaratory Relief and Injunctive Relief is brought by Plaintiff, the City
23 of El Cajon ("City"), and directed to and against Defendant Rob Bonta, Attorney General of
24 California, in his official capacity as the Attorney General of the State of California ("Attorney
25 General").

26 **I. INTRODUCTION**

27 Disregarding the provisions of the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq.,
28 California has attempted to nullify the will of Congress' by enacting a suite of statutes that induce

1 and encourage illegal aliens to reside within its borders.

2 California’s sanctuary scheme includes provisions that, inter alia, prohibit law enforcement
 3 officers from working with federal immigration authorities (the “LEO Policies”¹), as well as policies
 4 offering illegal aliens government benefits such as drivers’ licenses and workplace protections (the
 5 “Benefits Policies²,” together with the LEO Policies, the “Sanctuary Policies”). When enacting the
 6 Sanctuary Policies California legislators declared their intent to make California a place where illegal
 7 aliens can live and work “without fear of deportation.”³

8 However, California’s desire to bolster the state’s economy with illegal alien labor is in
 9 complete violation of 8 U.S.C. § 1324(a)(1)(A)(iv) (henceforth, “Section 1324”). Specifically, under
 10 Section 1324 it is a felony when a person “encourages or induces an alien to come to, enter, or reside
 11 in the United States, knowing or in reckless disregard of the fact that such coming to, entry, or
 12 residence is or will be in violation of law.” In addition to these criminal penalties, Section 1324 is a
 13 predicate offense⁴ for civil injunctive relief under the federal racketeering statute, 18 U.S.C. § 1964.
 14 The broad scope of the LEO Provisions have swept the City into this dispute over our federal
 15 structure. As the employer of over 120 police officers, the LEO Policies place the City in an
 16 impossible position. If the City advises its Police Department to follow state law and works to defeat
 17 federal law by turning a blind eye to immigration offenses, it risks exposing both the City and those

18 _____

19 ¹ Specifically:

- 20 1. The California Values Act (Cal. Gov. Code §§ 7284, 7284.2, 7284.4, 7284.6, 7284.10, and 7284.12);
 21 2. The California TRUST Act (Cal. Gov. Code §§ 7282, 7282.5); and,
 22 3. The California TRUTH Act (Cal. Gov. Code §§ Cal. Gov. Code §§ 7283, 7283.1, and 7283.2).

23 ² These benefits include:

- 24 1. Driver’s licenses – AB 60, codified at Cal. Vehicle Code sections §§ 1653.5, 12800, 12801, 12801.5, 12801.9,
 25 12801.10, 12801.11;
 26 2. Employment benefits – https://edd.ca.gov/en/disability/undocumented_workers/;
 27 3. Workplace protections – Cal. Gov. Code § 7285.1;
 28 4. Health care – Cal. Welfare and Institutions Code § 14007.8; and,
 5. In-state college tuition – Cal. Education Code § 68130.5.

³ See, e.g., Assembly Committee on Appropriations, May 17, 2017, hearing on AB 450 (“AB 450 Report”).

⁴ 18 U.S.C. § 1961(1)(F).

1 officers to civil (or even criminal) liability, while if it follows federal law it risks liability for violating
2 the LEO Policies.

3 To resolve this dispute, the City is asking this Court to declare what law governs in El Cajon:
4 California’s LEO Policies, or Section 1324. The City respectfully submits that, under the Supremacy
5 Clause, Article VI, cl. 2, the Sanctuary Policies must yield to Section 1324. *Arizona v. United States*
6 567 U.S. 387, 399, (2012) (“state laws are preempted when they conflict with federal law ...
7 [including] cases where ‘compliance with both federal and state regulations is a physical
8 impossibility,’ ... and those instances where the challenged state law ‘stands as an obstacle to the
9 accomplishment and execution of the full purposes and objectives of Congress.’”) (citations omitted)).

10 **II. PARTIES**

11 1. Plaintiff, CITY OF EL CAJON, is and at all relevant times has been a charter city and
12 municipal corporation, exercising local control and authority over its municipal affairs, including the
13 constitution, regulation, and government of a city police force as authorized by Article XI, § 5 of the
14 California Constitution.

15 2. Defendant, ROB BONTA, is and at all relevant times was the Attorney General of the
16 State of California. He is being sued in his official capacity as Attorney General of the State of
17 California.

18 **III. JURISDICTION AND VENUE**

19 3. This Court has subject matter jurisdiction over this action pursuant to Article VI,
20 section 10 of the California Constitution and Code of Civil Procedure sections 410.10, 1060 and 526,
21 which authorize actions for declaratory and injunctive relief.

22 4. An actual, present, and justiciable controversy exists between Plaintiff and Defendant
23 regarding their respective rights and obligations under California’s Sanctuary Policies, including but
24 not limited to the California Values Act (Gov. Code § 7284 et seq.), considering conflicting federal
25 law, including 8 U.S.C. § 1324. Plaintiff is presently subject to these statutes and faces a concrete
26 and immediate dilemma: compliance with state law risks exposure to liability under federal law,
27 while compliance with federal law risks enforcement action by Defendant. Declaratory relief is
28 therefore necessary and appropriate to resolve this controversy.

1 work in the United States (8 U.S.C. § 1324a(1) & (2)).

2 9. Additionally, Congressional acts hold that permissible grounds for deportation
3 include, inter alia, the following (collectively, “Deportation Provisions”):

- 4 (a) Termination of conditional permanent residence (8 U.S.C. § 1227(a)(1)(D));
- 5 (b) Knowingly encouraging, inducing, abetting, or aiding an alien to enter the United
6 States in violation of law (8 U.S.C. § 1227(a)(1)(E)(1));
- 7 (c) Marriage fraud (8 U.S.C. § 1227(a)(1)(G));
- 8 (d) Convictions for:
 - 9 i. Crimes of moral turpitude (8 U.S.C. § 1227(a)(2)(A)(i));
 - 10 ii. Aggravated felonies (8 U.S.C. § 1227(a)(2)(A)(iii));
 - 11 iii. Flight from checkpoints (8 U.S.C. § 1227(a)(2)(A)(iv);
 - 12 iv. Controlled substance violations (8 U.S.C. § 1227(a)(2)(B));
 - 13 v. Certain firearm offenses (8 U.S.C. § 1227(a)(2)(C)); and,
 - 14 vi. Domestic violence violations (8 U.S.C. § 1227(a)(2)(E));
- 15 (e) Falsely representing himself as a citizen for any purpose or benefit (8 U.S.C. §
16 1227(a)(3)(D));
- 17 (f) Becoming a public charge (8 U.S.C. § 1227(a)(5)); and,
- 18 (g) A catch all provision, declaring that an alien’s presence in the United States in
19 violation of the laws governing immigration or nationality or any other law of the United
20 States is grounds for deportation (8 U.S.C. § 1227(a)(1)(B)).

21 10. California’s Sanctuary Policies are a concerted effort to defeat the federal Residency
22 and Deportation provisions, and as such easily establish a willful violation of Section 1324’s
23 prohibition against encouraging or inducing illegal aliens to reside in the United States.

24 11. And this leads to the crux of the City’s concern: as its police officers interview
25 witnesses, gather background information on suspects, review inmate histories for other crimes, and
26 cooperate with federal law enforcement officers on a routine basis, those officers will invariably be
27 placed in the position of observing clear violations of federal law.

28 12. In order to comply with Sanctuary Policies—designed to further California’s unlawful

1 goal of boosting its economy with the labor of illegal aliens—those officers necessarily expose
 2 themselves and the City to potential liability for violating Section 1324.

3 California’s Sanctuary Policies: The LEO and Benefits Policies

4 **The LEO Policies**

5 13. The LEO Policies prohibit law enforcement officers from, inter alia, inquiring into an
 6 illegal alien’s immigration status, holding illegal aliens until immigration authorities can pick them
 7 up, or otherwise assisting federal immigration authorities such as by providing space for immigration
 8 officials to work inside police departments or county jails.

9 14. The key provisions of the LEO Policies are:

10 (a) the California Values Act (“CVA”), Senate Bill 54 (“SB 54”) from the 2017-2018
 11 session, codified at Cal. Gov. Code §§ 7284, 7284.2, 7284.4, 7284.6, 7284.10, and 7284.12;

12 (b) the California TRUST Act, codified at Cal. Gov. Code §§ 7282, 7282.5; and,

13 (c) the California TRUST Act (Cal. Gov. Code §§ 7282 and 7282.5).

14 15. By far, however, the most important provisions of the LEO Policies are contained in
 15 the CVA.

16 16. Specifically, the CVA restrains law enforcement officers from doing, inter alia, the
 17 following activities related to immigration enforcement:

18 (a) Inquiring into an individual’s immigration status (Cal. Gov. Code § 7284.6(a)(1)(A));

19 (b) Detaining individuals due to federal immigration hold requests (Cal. Gov. Code §
 20 7284.6(a)(1)(B));

21 (c) Providing non-public information regarding a person’s release date (Cal. Gov. Code
 22 § 7284.6(a)(1)(C));

23 (d) Providing non-public personal information (Cal. Gov. Code § 7284.6(a)(1)(D));

24 (e) Making or participating in arrests based on “civil immigration warrants” (Cal. Gov.
 25 Code § 7284.6(a)(1)(E));

26 (f) Assisting immigration officials in certain specific activities (Cal. Gov. Code §
 27 7284.6(a)(1)(F) and (G));

28 (g) Transferring individuals to immigration authorities absent judicial warrant or

1 probable cause determination (Cal. Gov. Code § 7284.6(a)(4));

2 (h) Providing office space to immigration authorities in city or county law enforcement
3 facilities (Cal. Gov. Code § 7284.6(a)(5)); and,

4 (i) Housing individuals for immigration purposes (absent certain exceptions) (Cal. Gov.
5 Code § 7284.6(a)(6)).

6 17. The CVA tasks the California Attorney General with providing model guidance to
7 entities such as public schools, libraries, health facilities, and courthouses demonstrating the best
8 means of “limiting assistance with immigration enforcement to the fullest extent possible consistent
9 with federal and state law.” Cal. Gov. Code § 7284.8(a).

10 18. The legislative history of the CVA removes any doubt that the CVA was designed to
11 bolster California’s economy with illegal alien labor.

12 19. Responding to President Trump’s 2017 announcement to fully enforce federal
13 immigration law, the author of SB 54 stated that the CVA was necessary because an “expansion of
14 federal deportation efforts will have a significant effect on California’s economy and society.” SB
15 54 Senate Rules Committee Third Reading, March 29, 2017, P. 7.

16 20. Supplementing the CVA, the California TRUST Act lists the offenses (most of which
17 involve violent crimes) where law enforcement enjoys authority to cooperate with immigration
18 officials. Cal. Gov. Code § 7282.5.

19 21. Finally, completing the LEO Policies are the TRUTH Act provisions that impose the
20 following requirements:

21 (a) Law enforcement agencies must advise illegal aliens:

22 i. when an ICE hold has been placed on them, and if the agency
23 will comply with the request (Cal. Gov. Code § 7283.1(b));
24 and,

25 ii. that interviews with ICE are voluntary and can be conducted in
26 the presence of their attorney (Cal. Gov. Code § 7283.1(a)).

27 (b) The governing bodies of law enforcement agencies that cooperate with ICE must host
28 public forums “to receive and consider public comment” (Cal. Gov. Code § 7283.1(d)).

1 22. The Attorney General of California plays an essential role in the implementation and
2 enforcement of the LEO Policies.

3 23. Pursuant to Article 5, Section 13 of the California Constitution, the Attorney General
4 has “direct supervision over every district attorney and sheriff and over such other law enforcement
5 officers” and is charged with ensuring that the “laws of the state are uniformly and adequately
6 enforced.”

7 24. As it relates to the LEO Policies, the previous and current Attorneys General have
8 routinely issued bulletins to California’s law enforcement agencies advising them on how to comply
9 with California’s sanctuary policies, with Attorney General Bonta issuing a comprehensive law
10 enforcement bulletin in January 2025. See, e.g., 2025-DLE-03 Information Bulletin, “Updated
11 Responsibilities of Law Enforcement Agencies Under the CVA, California TRUST Act, and the
12 California TRUTH Act,” January 17, 2025, henceforth, “Bonta Bulletin.”⁵

13 25. While the Bonta Bulletin discusses the TRUTH and TRUST Acts, the lion’s share of
14 the Bulletin is devoted to the CVA.

15 26. The Bonta Bulletin emphasizes that “immigrants are valuable and essential members
16 of the California community” and states that the CVA is designed to ensure “a relationship of trust
17 between California’s immigrant community and state and local agencies.”

18 27. As shown in in the Bonta Bulletin, the CVA prohibits the use of law enforcement
19 “resources to investigate, interrogate, detain, detect, or arrest persons for immigration purposes.”

20 28. Defendant has the authority to enforce the Sanctuary Policies against Plaintiff and has
21 demonstrated a willingness to do so through the issuance of formal guidance, bulletins, and the
22 availability of civil enforcement mechanisms. Plaintiff therefore faces a credible and immediate
23 threat of enforcement if it declines to comply with the challenged statutes.

24 29. The City faces a real and substantial risk of civil liability if it complies with federal
25

26 ⁵ There is also an April 7, 2025 California DOJ bulletin on NCIC administrative warrants and compliance with SB 54
27 advising California law enforcement agencies that they are prohibited from contacting federal immigration authorities
28 about administrative warrants or hold requests, responding to an administrative warrant in any manner, asking about
immigration status or the administrative warrant, or detaining someone based on the administrative warrant or hold
request past the time they would otherwise be free to leave: <https://oag.ca.gov/system/files/media/2025-dle-08.pdf>.

1 law rather than California’s statutes.

2 30. For example, the Attorney General has authority under Cal. Civ. Code § 52.3 to bring
3 injunctive and declaratory actions when a law enforcement officer acts in a way that “deprives any
4 person of rights, privileges, or immunities secured or protected by the ... laws of California.”

5 31. Individual plaintiffs have also brought actions for violations of the CVA under the
6 Tom Bane Civil Rights Act, Cal. Civ. Code § 52.1. See, e.g., *Roman v. Orange County Sheriff’s*
7 *Department, et al.*, 20-cv-1580, S.D. Ca., ECF No. 10.

8 32. Accordingly, without declaratory relief from this Court, the City faces a real and
9 substantial threat of civil liability if it follows federal law rather than the LEO Policies.

10 33. Plaintiff has no adequate remedy at law for the injuries described herein. Absent
11 injunctive relief, Plaintiff will suffer immediate and irreparable harm, including but not limited to
12 ongoing interference with its law enforcement operations, diversion of municipal resources, and
13 exposure to conflicting legal obligations under state and federal law. These harms include the risk of
14 civil and criminal liability that cannot be remedied by monetary damages and will continue unless
15 Defendant is enjoined from enforcing the challenged statutes against Plaintiff.

16 **Benefits Policies**

17 34. To understand the role the LEO Policies play in encouraging illegal aliens to
18 unlawfully reside in California and contribute to the state’s economy “without fear of deportation,”
19 it is necessary to demonstrate how they complement the Benefits Policies.

20 35. The Benefits Policies were enacted from a baseline perspective that California not
21 only knows illegal aliens reside within its borders, but wants them to do so.

22 36. For example, legislative history of AB 450—the Benefits Policies provision designed
23 to shield illegal aliens from surprise inspections by immigration authorities at their place of work,
24 Cal. Gov. Code § 7285.1(a) (prohibiting employers from granting voluntary consent to immigration
25 enforcement agents to enter nonpublic areas of the business premises), states that the bill “seeks to
26 ensure that all California workers, regardless of immigration status, enjoy the protections afforded to
27 them under state law ‘without fear of ... deportation.’” AB 450 Report.

28 37. Another legislative report on AB 450 stated that “almost 1 in every 10 workers in

1 California is undocumented” and any “increase in workplace raids and audits of employee work
2 authorization records will have a dramatic impact on California workers and businesses.” Senate
3 Judiciary Committee, July 11, 2017 hearing on AB 450.

4 38. California’s own statements and actions in implementing the Benefits Policies
5 demonstrates this open and notorious scheme:

6 (a) Driver’s Licenses: California maintains a website boasting that licenses are available
7 “for individuals who are unable to provide proof of legal presence in the United States ... and are
8 able to provide proof of identity and California residency,”⁶ (emphasis added);

9 (b) Employment Benefits: California maintains a website informing illegal aliens that
10 California provides benefits for “partial pay when you need time off work for your own disability or
11 family leave” and that “an undocumented worker” is eligible as it “doesn’t matter what your
12 citizenship or immigration status is” and that the “information will be kept confidential,”⁷ (emphasis
13 added);

14 (c) Workplace Protections: The California Labor Commission and Attorney General have
15 provided joint guidance to every employer in the state that, inter alia, advises them that they “shall
16 not provide ‘voluntary consent’ to the entry of an immigration enforcement agent to ‘any nonpublic
17 areas of a place of labor’” and that they must provide notice to employees within “72 hours of
18 receiving a Notice of Inspection of I-9 forms or other employment records by an immigration
19 agency;”⁸

20 (d) Health Care: California’s Medi-Cal health service advertises that adults currently
21 enrolled in the plan can remain, “regardless of immigration status” but warns illegal aliens that under
22 a recent court decision “CMS may share certain basic information with Immigration and Customs
23 Enforcement (ICE) only about individuals who are not ‘lawfully residing’ in the United States,”⁹
24 (emphasis added); and,

25 _____
26 ⁶ <https://www.dmv.ca.gov/portal/driver-licenses-identification-cards/assembly-bill-ab-60-driver-licenses/>

27 ⁷ https://edd.ca.gov/en/disability/undocumented_workers/

28 ⁸ https://www.dir.ca.gov/dlse/AB_450_QA.pdf

⁹ <https://www.dhcs.ca.gov/keep-your-Medi-Cal/Pages/Medi-Cal-Immigrant-Eligibility-FAQs.aspx>

1 (e) In-State Tuition: California’s Student Aid Commission website touts itself as the
2 “ultimate guide to navigating higher education as an undocumented student in California!” and that
3 information provided by illegal aliens “is only used to determine eligibility for state financial aid”
4 and that this “information is never shared with the federal government or used for immigration
5 enforcement,”¹⁰ (emphasis added).

6 39. California’s repeated assurances and warnings about what personal information is and
7 is not shared with federal authorities, demonstrates it knows these illegal aliens are unlawfully
8 residing in California, clearly meeting Section 1324’s “knowing or ... reckless disregard” intent
9 standard.

10 California’s Effort to Nullify Federal Law and the Impact on El Cajon

11 40. The LEO Policies—the CVA, TRUTH Act, and TRUST Act—work in harmony with
12 the Benefits Policies to assure illegal aliens that California is fully committed to their living in the
13 state “without fear of deportation.”

14 41. California has essentially admitted that its Sanctuary Policies—by design—seek to
15 nullify federal law.

16 42. In a challenge brought by the United States to the CVA and other sanctuary statutes,
17 California acknowledged these laws were important to “build trust with communities so that victims
18 or witnesses felt secure reporting crimes without fear of deportation.” *United States v. California*,
19 2:18-cv-490, E.D. Ca., Defendants Opposition to Plaintiff’s Motion for Preliminary Injunction, ECF
20 No. 74, p. 15 (emphasis added).¹¹

21 43. While the Sanctuary Policies are an unapologetic effort to nullify the Residency and
22 Deportation Provisions and are therefore facially invalid under the Supremacy Clause, as applied to
23

24 ¹⁰ <https://www.csac.ca.gov/undocumented>

25 ¹¹ While the CVA was ultimately upheld in this action, that case focused on concerns about federal government
26 encroachment on state and local autonomy over law enforcement. By contrast, the specific issue raised in this action—
27 the fact that the LEO Policies compel the City to aid and abet knowing violations of Section 1324—was not addressed
28 by that court. *United States v. California*, 921 F.3d 865 (9th Cir. 2019). A favorable decision from this Court will not
convert City Police Officers into federal immigration officials; the declaratory relief sought here would hold that
California may not, through the LEO Policies, compel the City to facilitate violations of federal immigration law. As the
conflict with 8 U.S.C. § 1324 was neither presented nor resolved in California nothing in that decision addresses the
City’s real and immediate concern: what law governs, California’s Sanctuary Policies or federal criminal law?

1 the City these laws have had a major impact on public safety.

2 44. The harms described herein also implicate significant public interests, including the
3 effective administration of local law enforcement and the proper allocation of authority between state
4 and federal law. Enforcement of statutes preempted by federal law constitutes an ongoing
5 constitutional injury, further supporting the need for immediate injunctive relief.

6 45. By prohibiting, inter alia, inquiries into immigration status and coordination with
7 immigration authorities, California's LEO Policies compel the City's police officers to facilitate
8 knowing violations of federal immigration law.

9 46. The impact of the LEO Policies on the City includes but is not limited to:

10 (a) Preventing wellness checks on minors based off information provided by immigration
11 authorities;

12 (b) Causing delays in responding to emergency calls as officials must clarify if law
13 enforcement or social workers may respond to an incident;

14 (c) Preventing Officers from working with federal immigration authorities on translation
15 issues;

16 (d) Preventing Officers from transferring illegal aliens charged with crimes such as theft,
17 trespass, assault, or vandalism to the custody of immigration officials;

18 (e) Complicating the ability of Officers to assist federal immigration officials engaged in
19 dangerous, high-speed chases with illegal aliens fleeing the Campo Station checkpoint;

20 (f) Devoting valuable time to training on compliance with the LEO Policies; and,

21 (g) Generally causing Officers to limit pro-active public safety measures to ensure
22 compliance with SB 54.

23 47. The City should be free to respond to public safety matters in a manner which
24 prioritizes a speedy response that serves the public, not legal hairsplitting.

25 48. Currently, the LEO Policies compel local law enforcement to participate in
26 Sacramento's wholesale effort to nullify federal immigration authority.

27 49. If this Court holds that the LEO Policies conflict with Section 1324 and declares them
28 invalid, the City's Police Officers will not suddenly turn into federal immigration officers; rather,

1 basic safety concerns will return to the local authorities who have the best sense of the needs of the
2 public they serve.

3 **FIRST CAUSE OF ACTION**

4 **(Declaratory Relief: As-Applied Conflict Preemption Under the Supremacy Clause)**

5 *(Against All Defendants)*

6 50. The Plaintiff hereby re-alleges and incorporates by reference each and every
7 preceding allegation of this Complaint as though fully set forth herein.

8 51. By compelling officers to refrain from sharing information, coordinating transfers,
9 responding to federal criminal immigration warrants, providing access, or otherwise cooperating with
10 federal authorities in circumstances involving known or suspected violations of 8 U.S.C. § 1324 the
11 LEO Policies are preempted as applied to the City.

12 52. An actual controversy has arisen and now exists between the City and Defendants
13 concerning their respective rights and duties under the LEO Policies, including, but not limited to,
14 the ability to implement the LEO Policies and comply with Section 1324.

15 53. Defendants have a clear, present, and ministerial duty to administer the California
16 Constitution and laws of the State of California, including SB 54, without violating federal law.

17 54. California’s Sanctuary Policies represent a knowing and willful attempt to frustrate
18 the Residency and Deportation Provisions and fall within the prohibitions of Section 1324.

19 55. The Sanctuary Provisions are therefore invalid under the Supremacy Clause as they
20 stand “as an obstacle to the accomplishment and execution of the full purposes and objectives of
21 Congress.” *Arizona v. United States*, 567 U.S. 387, at 399 (2012).

22 56. Declaratory Relief will resolve the conflict between the LEO Policies and Section
23 1324.

24 57. A judicial declaration and determination is necessary at this time so that the City may
25 properly advise its law enforcement officers as to whether they must comply with the LEO Policies
26 or if they may exercise their discretion to report knowing or suspected violations of federal
27 immigration law.

28 ///

SECOND CAUSE OF ACTION

(Declaratory Relief: The LEO Policies are Invalid as Congress has Preempted the Field of State Efforts to Defeat Federal Deportation Provisions)

(Against All Defendants)

58. The Plaintiff hereby re-alleges and incorporates by reference each and every preceding allegation of this Complaint as though fully set forth herein.

59. An actual controversy has arisen and now exists between the City and Defendants concerning their respective rights and duties under the LEO Policies, including, but not limited to, the ability to implement the LEO Policies and comply with Section 1324.

60. Defendants have a clear, present, and ministerial duty to administer the California Constitution and laws of the State of California, including SB 54, without violating federal law.

61. California’s Sanctuary Policies represent a knowing and willful attempt to frustrate Congress’ Residency and Deportation Provisions and fall within the prohibitions of Section 1324.

62. California is “precluded from regulating conduct in a field that Congress ... has determined must be regulated by its exclusive governance.” *Arizona v. United States*, 567 U.S. 387, at 399 (2012).

63. Section 1324 and the Residency and Deportation Provisions represent a “federal interest ... so dominant that the federal system will be assumed to preclude enforcement of state laws on the same subject.” *Id.*

64. Further, this Congressional “framework of regulation [is] ‘so pervasive ... that Congress left no room for the States to supplement it.’” *Id.*

65. Declaratory Relief will resolve the conflict between the LEO Policies and Section 1324.

66. A judicial declaration and determination is necessary at this time so that the City may properly advise its law enforcement officers as to whether they must comply with the LEO Policies or if they may exercise their discretion to report knowing or suspected violations of federal immigration law.

///

PRAYER FOR RELIEF

Plaintiff CITY OF EL CAJON, a Public entity, respectfully prays for the following relief against Defendants, and each of them:

- A. Declaratory relief providing that:
 - i. The LEO Policies, to wit: the California Values Act (Cal. Gov. Code §§ 7284, 7284.2, 7284.4, 7284.6, 7284.10, and 7284.12), the California TRUST Act (Cal. Gov. Code §§ 7282, 7282.5), and the California TRUTH Act (Cal. Gov. Code §§ Cal. Gov. Code §§ 7283, 7283.1, and 7283.2) are invalid under the Supremacy Clause as they violate Section 1324;
- B. Preliminary and permanent injunctive relief prohibiting Defendant from enforcing the LEO Policies against Plaintiff, including but not limited to any action to compel compliance by Plaintiff or its law enforcement officers;
- C. Attorney’s fees and costs pursuant to Code of Civil Procedure § 1021.5, and as may otherwise be permitted by law; and
- D. For such other and further relief as the Court deems just and proper.

Dated: April 28, 2026

REDEN | RIDDELL

By: /s/ Justin G. Reden
Justin G. Reden, Esq.
Richard Lawson, Esq. *pro hac vice*
forthcoming
Attorneys for Plaintiff,
CITY OF EL CAJON