

Sanctuary Cities  
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I. Introduction via a High Profile Case

On July 1, 2015 a bullet from a SigSauer .40 pistol struck in the back and subsequently killed Kate Steinle, a 32 year old woman walking with her father on Pier 14 in San Francisco, California. The weapon was in the possession of Jose Ines Garcia Zarate, a 45 year old undocumented/illegal immigrant from Mexico.<sup>1</sup> Defense attorney Matt Gonzalez said that Garcia Zarate had found the gun, wrapped in cloth, on the pier and that when he had unwrapped it, the gun fired on its own, though under police questioning Garcia Zarate admitted to firing the gun, but said that he had been aiming at a seal. In another account he said that he had stepped on the gun and, in so doing, had caused it to fire (Yan & Simon). Before the shooting San Francisco authorities had released Garcia Zarate from custody, instead of holding him for ICE, Immigration and Customs Enforcement, who had requested that he be detained so that they could take him into custody, and they did so, according to Freya Horne, chief legal counsel to the Sheriff of San Francisco county, because there was no legal reason for the Sheriff's office to keep him in custody (Sermoffsky & Van Derbeken, 2015).

Garcia Zarate was a seven-time convicted felon (four conviction were drug related, while three pertained to illegal entry into the United States), who had been deported five times, twice for drug-related convictions and three times for illegal (re)entry into the US. Garcia Zarate was in San Francisco custody in the spring of 2015 on a decades-old felony charge of possessing and selling marijuana, which charge ICE wanted cleared before deporting him for the sixth time. But on March 27, 2015 San Francisco chose not to prosecute this old charge, and he was released on April 15<sup>th</sup>, after a determination that no other charges were pending, and ICE was not notified (Semoffsky & Van Derbeken, 2015), even though ICE had requested that he be detained for his deportation ("Immigration officials to deport," 2017).

The action of San Francisco authorities was taken in compliance with two documents in particular, first, and more specifically, a March 13, 2015 inter-office correspondence memorandum (2015-036) from Sheriff Ross Mirkarimi that severely restricted the ability of local law enforcement to cooperate with the federal authorities of ICE (Mirkarimi, 2015). It reads in part:

SFSD staff shall not provide the following information or access to ICE representatives:

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<sup>1</sup> Garcia Zarate has also gone under the alias Juan Francisco Lopez-Sanchez.

- citizenship/immigration status of any inmate;
- access to inmates in jail;
- access to SFSD computers and/or databases;
- SFSD logs;
- booking and arrest documents;
- release dates or times;
- home or work contact information;
- other non-public jail records or information.

The second determinative document, more general and earlier, was the October 8, 2013 “San Francisco Due Process Ordinance for All on Civil Investigation Detention,” which went into effect on November 8, 2013. A related document entitled “Know Your Rights” summarizes the key points thus (“Know Your Rights,” 2013):

Under the policy, the vast majority of individuals who enter the criminal justice system in San Francisco will no longer be turned over to ICE through use of an ICE hold request. Thus, even if ICE issues an ICE hold, San Francisco law enforcement will not detain the individual for extra time for ICE. There are very limited circumstances in which some people *may* be turned over to ICE....<sup>2</sup>

Also, on October 1, 2016, or comprehensive immigration reform, whichever comes first, no ICE holds will be responded to in *any* circumstance.

In response to the Steinle incident, then Attorney General Jeff Sessions said: “I urge the leaders of the nation's communities to reflect on the outcome of this case and consider carefully the harm they are doing to their citizens by refusing to cooperate with federal law enforcement officers.” And further: “When jurisdictions choose to return criminal aliens to the streets rather than turning them over to federal immigration authorities, they put the public's safety at risk” (Yan & Simon, 2017). Then deputy director of ICE, Tom Homan, concurred: “San Francisco's

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<sup>2</sup> It should be noted that the “very limited circumstances” in which ICE detainers may be honored is very limited, indeed. The “Know Your Rights” document of 2013 details them thus:

Local law enforcement *may* respond to an ICE hold request only if:

1. The individual has been **convicted** of a **violent felony** or three additional crimes<sup>2</sup> in **the last seven years AND**;
2. The individual has a **present charge** for a **violent felony**, and a judge made a finding that there is probable cause to move forward with the charge (pursuant to CA Penal Code 827).  
In these circumstances, an ICE hold *may* be responded to for 48 hours after the individual is otherwise eligible for release in their criminal case. Note that if the District Attorney decides not to file charges or if the judge doesn't find probable cause to move forward with the charge, it can **NOT** be used to hold someone on an ICE hold. (All emphasis original)

policy of refusing to honor ICE detainers is a blatant threat to public safety and undermines the rule of law” (Yan & Simon, 2017).

Finally, as a result of the killing of their daughter, the Steinle family filed a lawsuit against the city of San Francisco and former Sheriff Ross Mirkarimi, claiming that “San Francisco and its former sheriff were partly to blame for Steinle's death, because officials never notified Immigration and Customs Enforcement when Garcia Zarate was released,” but city officials countered by asserting that they were not “liable for a former inmate’s actions.” The Steinle lawsuit against both parties was dismissed by a federal judge in 2017 (Yan & Simon, 2017).

## II. General Considerations on the Topic

### A. Definitions and Descriptions

I have looked at the Kate Steinle case in some detail because, it is a salient example of the conduct of city officials in places that have come to be called “sanctuary jurisdictions.” To put the matter in definitional terms, a “sanctuary jurisdiction” or “city” may be characterized as a place in which US citizenship is not a significant category, or, not a category to be recognized or considered for the purposes of the functioning of local government or the conduct of local law enforcement. Otherwise expressed, a “sanctuary city” is a locality in which all inhabitants of the local political unit are treated equally without regard to their immigration or citizenship status. As of the end of 2016 the following statistics can be offered concerning this phenomenon: There are approximately 40 cities (including Los Angeles, San Francisco, Seattle, Las Vegas, Tucson, New York, Boston, and Chicago) and 364 counties (mainly in the states of California, Colorado, Florida, New York, Oregon, and Washington) with some sort of sanctuary policy. Additionally, four states as such have statewide sanctuary policies: California, Connecticut, Rhode Island, and Vermont (*ProCon*, 2016).

What this means in practical terms varies widely. The Kate Steinle case provides an illustration at one end of the spectrum. In San Francisco, local government and law enforcement officials are actively *hostile* to federal authorities with regard to immigration and citizenship status issues. Not all cities or political entities take this stand, however; i.e., all do not act *not to enable* the application of federal immigration statutes. But all such cities/entities do *deliberately ignore* federal immigration law, even if they are not hostile to federal immigration officials or obstructive to their activities.

Whatever the attitude of local government and law enforcement officials toward federal immigration rules and toward cooperation with federal immigration authorities, the following may be said to characterize cities (and other entities) that describe themselves as having

“sanctuary policies”: *negatively*: prohibition of “municipal police forces and city services agencies from requesting, recording, or disseminating status information, and denying cooperation with federal immigration authorities unless required by federal or state law” (Bauder, 2017: 176); *positively*: efforts to regularize the lives of illegal immigrants and to allow them “to better cope with their circumstances... mak[ing] life less difficult under the condition of illegality” (Bauder, 2017: 177). Specifics relative to these two points vary rather widely, but as examples we may note the following from Tal Kopan’s CNN article from 2018 entitled “What are sanctuary cities, and can they be defunded”:

- Los Angeles does not allow police to stop people solely to establish their immigration status.
- Los Angeles, Chicago, and San Francisco have city funds “to provide legal services to the immigrant community, documented or otherwise.”
- Chicago does not “discriminate issuing city services depending upon citizenship.”
- Twelve states plus the District of Columbia allow undocumented immigrants to obtain driver’s licenses.
- All such cities do not honor ICE detention requests (detainers) related solely to immigration status. In fact, some 300 sanctuary jurisdictions rejected more than 17,000 detention requests between the beginning of 2014 and the end of September, 2015.

Finally, it is also proper to say that many cities are sanctuary cities *de facto*, if not *de jure*—they are *virtual* sanctuary cities, being *benign* (my word) on the matter of immigration and citizenship status, as they follow, in actual practice, a DADT policy of civic and police engagement with inhabitants. An example seems to be our own Fort Wayne, Indiana. When I reached out to the office of Mayor Tom Henry on this topic through spokesman John Perlich, I received the following from him in response, here quoted in part (John Perlich, email message to author, February 12, 2019):

We don’t have to be a sanctuary city to treat people, including undocumented immigrants, with decency and respect. Fort Wayne is proud to be a leader in refugee and immigration efforts....

In addition, the City of Fort Wayne is fortunate to have several organizations that further strengthen support systems for our immigrant population....<sup>3</sup>

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<sup>3</sup> This paragraph of the email continues: “For instance, the mission of Amani Family Services is to “partner with immigrant and refugee families and the community to promote safety, encourage personal growth, and foster a spirit of belonging.” Prior to becoming the executive director of Amani, Irene Paxia worked for the City as a Community Development Specialist, so she is very familiar with how the City administration can work with agencies to serve one of our potentially vulnerable populations.”

For more than two centuries, our community has been enriched by the talents, skills and cultures of all who live and thrive in Fort Wayne....We all should be proud of our many international populations that call Fort Wayne home. It is important to make sure Fort Wayne is a welcoming place for everyone—a place of pride and opportunity for all.

Noteworthy is the use of the phrase “including undocumented immigrants”—indeed, the use of the appellation “undocumented” rather than “illegal”—as well as a consistent avoidance of the nouns “citizen” or “citizenship,” in favor of more neutral verbiage to describe the city’s inhabitants, such as “immigrant population,” “all who live and thrive in Fort Wayne,” and “populations that call Fort Wayne home.”<sup>4</sup>

As a summary statement that allows us also to focus on the *purpose* of sanctuary policies, the following statement of Tal Kopan is apt (Kopan, 2018): “The goal of the constellation of informal and formal policies is generally to protect undocumented immigrants who are not otherwise engaged in criminal activity from being detained or deported.”

## B. Arguments Pro and Con Sanctuary Policy

There are strong arguments for and against sanctuary policies. An exceptionally helpful summary is presented on the website *ProCon*. They may be summarized as follows:

### 1. Pro

- a. “Sanctuary cities are safer because they encourage good relationships between undocumented immigrants and law enforcement. 70% of undocumented immigrants and 44% of Latinos surveyed are less likely to report if they were the victim of crime and 45% of Latinos are less likely to report crimes or voluntarily offer information about a crime for fear police officers would ask about their immigration status.” As a result, in the words of US Representative Zoe Lofgren (D), “criminals thrive, and the general public suffers.”

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<sup>4</sup> This stance/viewpoint is confirmed by the following response received from Michael Joyner, spokesman for the police department of the City of Fort Wayne (Michael Joyner, email message to author, February 18, 2019): “Indiana law does not provide for cities to be able to declare themselves as sanctuary cities. Fort Wayne has been and continues to be an inviting and welcoming City. We’re proud to be a leader in refugee and immigration efforts, most notably with our Burmese population. Fort Wayne is home to immigrants from all over the world who are making a meaningful difference in our community and region.” Note especially the wording of the first sentence of the response.

- b. “Sanctuary policies are legal and protected by the Tenth Amendment. The Tenth Amendment of the US Constitution provides for the separation of federal and state powers. According to the Immigrant Legal Resource Center, the Amendment prevents the ‘federal government from coercing state or local governments to use their resources to enforce a federal regulatory program, like immigration....’”
  - c. “Many people state that the federal immigration deportation policies are unjust because they target undocumented immigrants indiscriminately, deport people who have lived in the United States since childhood, deport people who have committed no crimes, separate families, and cause people to live in constant fear of deportation and its devastating consequences.”
2. Con
- a. “Sanctuary cities harbor criminals, creating a dangerous environment for US citizens....Of 8,145 undocumented immigrants released from detention requests between Jan. 1, 2014 and Aug. 31, 2014, 5,132 (63%) had previous criminal convictions or were marked a public safety concern; 2,984 (36.6%) had felony charges or convictions; 1,909 (23.4%) had misdemeanor convictions or charges related to violence, assault, sexual abuse, weapons, or drug distribution....”
  - b. “Sanctuary policies defy federal laws to which state and local governments are bound. 8 U.S. Code § 1373 states that ‘a Federal, State, or local government entity or official may not prohibit, or in any way restrict, any government entity or official from sending to, or receiving from, the Immigration and Naturalization Service information regarding the citizenship or immigration status, lawful or unlawful, of any individual.’ The Department of Justice requires that most recipients of federal grant money certify their compliance with all federal laws....”
  - c. “Sanctuary policies prevent local and state police officers from doing their jobs. Sanctuary policies prevent police from investigating, questioning, and arresting people who have broken federal immigration law. Many crimes, violent and otherwise, could be prevented if local law enforcement in sanctuary cities could arrest undocumented immigrants for their first crime on US soil—illegal entry into the country—and turn them over to federal law enforcement.... Instead, law enforcement has to wait for a second crime to be committed to get the criminals off the street.”

One might add, especially with regard to the first and third items above concerning life in a community, the matter of the rule of law in general, i.e., that sanctuary policies can be said to undermine the basic legal structure that promotes a stable society and allows it to function effectively.<sup>5</sup>

### III. A Deeper Dive

#### A. History

The origin of sanctuary policy is ancient and is associated with Judaism, Christianity, but also with Buddhism, Islam, Hinduism, and Sikhism. The book of Numbers in the OT/Hebrew Bible describes six cities of refuge, which offer sanctuary to people who have accidentally killed someone and who would be subject to death by someone who avenges the blood of the victim (Num 35: 6, 9-15 [especially verses 11-12]). Later, Roman law dating to AD 392 granted the privilege of offering sanctuary to churches, which practice continued into the Middle Ages in Europe, where protection from secular authorities was granted to criminals (Bauder, 175). Many European cities also offered freedom to serfs who fled from where they were bonded (Bauder, [2017: 175-76] quotes the phrase “city air makes you free”).

Because of specifically *national* immigration policies beginning in the West in the 20<sup>th</sup> century, churches in Europe and in the US “began to offer sanctuary to rejected refugee claimants [and] asylum seekers” (Bauder, 175-76). Thus, in more recent years, sanctuary activities have shifted their focus from criminals to refugees and other migrants. According to Bauder (176), specifically urban sanctuary practice can be traced to the city of Berkeley, California: “in 1971 it offered protection to soldiers on board the aircraft carrier USS Coral Sea who resisted the Vietnam War.” Later, in the 1980s, churches provided “sanctuary to Central Americans fleeing violence at home and reluctance by the federal government to grant them refugee status” (Kopan, 2018).

It should be noted that “sanctuary” is not only a United States phenomenon; it is also international, especially in Canada, the UK, and to some extent, Germany, though it is important to observe that different issues are at the forefront in different locales (Bauder, 2017, especially 176-80).

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<sup>5</sup> This point captures the irony that those fleeing lawless countries or environments for the sake of safety and stability engage in, as their first act relative to their new/destination country, the breaking of its laws.

## B. Reconsidering Terminology

While some terminology on this subject seems standard, with those favoring sanctuary policies employing, generally, the term “undocumented,” and those against such policies employing “illegal,” it is worth considering the proposal of Harald Bauder, who introduces the appellation “*illegalized*” (Bauder, 2017: 174):

My use of the term “illegalized” migrant—rather than undocumented, unauthorized, irregular, or non-status immigrant—is intended to draw attention to national laws, policies, and practices that deny migrants full status or legal residency....The use of this term seems particularly appropriate for a discussion of sanctuary cities, in which case local authorities, civic groups, and activists challenge national immigration laws, policies, and practices.

This term helps to focus upon the *status* of persons considered vis a vis *national* policy, rather than upon the nature of their moral character, or upon their possession/non-possession of particular official documents.

## C. A More Accurate Understanding of the Nature of Sanctuary and its Consequences

It is very important to realize what sanctuary *is* and is not, i.e., what it gives or accomplishes and what it does not give/accomplish. In the words of Bauder (2017: 177):

In reality, urban sanctuary policies and practices do not eliminate illegalization; they merely enable illegalized migrants to better cope with the circumstances. Thus, sanctuary cities do not tackle the root of the problem but rather make life less difficult under the condition of illegality. In fact, the term “sanctuary city” may evoke a false sense of security among illegalized urban populations. The American Immigration Council remarks that the term incorrectly suggests that local police can protect illegalized migrants from federal immigration authorities....While urban sanctuary policies and practices in the USA may help solve and prevent crime, they do not prevent federal immigration law enforcement activities against illegalized migrants. Thus, they cannot guarantee protection from federal immigration authorities. Even in sanctuary cities, illegalized migrants remain vulnerable to detection, detention, and deportation by US federal immigration authorities.

These facts have come to be recognized. In a 2018 article in the *New York Times*, Christina Goldbaum observes that “even when law enforcement officers do not cooperate with ICE,” ICE has “tools...at [its] disposal to locate unauthorized immigrants....” As a result, Rachel Yong Yow, a public affairs officer for ICE, says that “[w]hen cities do not comply with detainer requests, ‘ICE has no choice’ but to conduct ‘at-large arrests in local neighborhoods and at work



sites, which will inevitably result in additional collateral arrests’ when ICE officers encounter unauthorized immigrants with no criminal histories.” (Goldbaum, 2018). Goldbaum concludes: “Where the widespread use of detainers erodes immigrants’ trust in local law enforcement, without detainers, ICE raids erode immigrant communities’ sense of security.”<sup>6</sup> What we are discussing here is, I believe, the root cause of the calls from some so-called “progressive” politicians for the defunding or the abolition of ICE. As long as Immigration and Customs Enforcement exists, no sanctuary jurisdiction is truly a “sanctuary” for those who are illegalized.

#### D. Two Foundational Theoretical Issues

##### 1. A Legal Matter of the United States Constitution

While the *ProCon* website laid out very well the arguments for and against sanctuary policy, a deeply theoretical consideration is hinted at in its second Pro/Con, *viz.*, the matter of the relationship between state and federal levels of government in terms of the power relationship between the two entities legally. (This relationship was also a key issue in Reconstruction after the Civil War.) *ProCon* makes the point that the 10<sup>th</sup> Amendment to the US Constitution prevents “the federal government from coercing state or local governments to use their resources to enforce a federal regulatory program, like immigration.” Increasingly, pro-sanctuary voices have turned to a states’ rights line of argument; indeed, it is reflected in the title of Goldbaum’s *New York Times* article: “Sanctuary City Defenders Find Edge in State Courts.” These voices have asserted that state (not federal) laws “determine the authority of local law enforcement.” Four state courts have ruled that “if law enforcement officers detained immigrants on behalf of ICE, that was considered a new arrest, which they did not have the authority to make under their respective state laws.” Goldbaum puts it in a summary way:

Though a handful of states...have passed laws banning sanctuary jurisdictions, where state legislators have not specifically targeted sanctuaries, advocates believe state laws and constitutions will generally favor the authority of the state to determine how its local law enforcement interacts with federal immigration authorities.

This is “Pro” point 2, above, *viz.*, that the federal government cannot “coerce state or local governments” to enforce federal law, seen “from the other side,” as it were. This is why, practically, “Congress cannot compel [state or] local governments to collect immigration status information in order to share it with the federal government”—because the states determine how

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<sup>6</sup> This has led John Sandweg, an acting director of ICE in the Obama administration, to assert that there “needs to be ‘some level of cooperation that works between sanctuary cities and ICE, otherwise nobody wins.’” (Goldbaum).

local law enforcement acts vis a vis federal statutes. It will be important to see how this matter is resolved relative to 8 US Code §1373 cited in the “Con” point 2, above, which prohibits the “restrict[ing] of any government entity or official from sending to, or receiving from, the Immigration and Naturalization Service information regarding the citizenship or immigration status, lawful or unlawful, of any individual,” since immigration law is *federal* law, as noted by Jessica Vaughan, director of Policy Studies at the Center for Immigration Studies in Washington, D.C. (Goldbaum, 2018). (The previous two points do, however, explain why, generally, sanctuary jurisdictions have DADT policies; it is “safer” for them not to possess immigration/citizenship information.) It is almost certain that the US Supreme Court will have to become involved in this issue. It will also be important to see how this matter is resolved relative to information that is *not directly related* to immigration/citizenship status, such as jail release dates/times, information that cities such as San Francisco also withhold from federal authorities (see the Mirkarimi memorandum, above.)

Finally, we observe that it has been difficult for the federal government, especially the executive branch, to “defund” sanctuary cities on the basis of the latter’s anti-federal policies, as has been attempted through, e.g., President Donald Trump’s executive order of January 25, 2017 pertaining to interior security, which said that “entities labelled ‘sanctuary jurisdictions’ by the secretary of the Department of Homeland Security will be ‘not eligible’ for federal grants,” and which also “directs the Office of Management and Budget to compile federal grant money currently going to sanctuary jurisdictions” (Kopan & Schoichet, 2017). In the words of Tal Kopan (Kopan, 2018):

The courts have held in the past that the federal government can only strip funding that is related to the policy involved -- so it's unlikely to hold up if the administration tried to take away highway funds, for example, according to experts. The courts have also ruled that funding decisions may not be used to "coerce" states into actions.<sup>7</sup>

## 2. Scale

The previous section leads naturally to the second foundational theoretical issue. For this section I will quote extensively from Harald Bauder’s 2017 essay “Sanctuary Cities: Policies and Practices in International Perspective,” a resource that I have already employed. Bauder brings to our attention the matter of what he calls “scale.” In his own words (181-82):

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<sup>7</sup> Kopan notes that funds related to the Justice Assistance Grant Program could possibly be withheld.

An aspect common to sanctuary-city policies and practices in the USA, UK, and Canada involves rejecting national approaches towards migration and refugee admission. In fact, urban sanctuary initiatives can be interpreted as the attempt to rescale migration and refugee policies and practices from national to urban scales. Especially sanctuary cities in the USA and Canada illustrate how urban communities do not see themselves as bound by federal migration and refugee laws that illegalize some of their residents. Rather, these cities evoke the *domicile* rule of belonging, which suggests that de-facto residents in a community should also be recognized as members of this community and correspondingly possess legal entitlements and receive municipal services and police protection....By implementing this rule, sanctuary cities include all residents in the local community, independent of their national citizenship or status....

Through rescaling the policies and practices of migration and belonging, sanctuary cities assert a “form of power and politics at the sub-national level....”<sup>8</sup> In this way, urban sanctuary policies and practices constitute a threat to national sovereignty....The gravity of a *legal* threat to sovereignty...is illustrated by the attempts among US federal lawmakers to deny municipal governments funding for enacting local sanctuary policies. Issuing local identification cards or recognizing cards issues by foreign governments also challenges national sovereignty and rearticulates who belongs in the community and who does not....and shift the scale of belonging from the national to the local....[R]efugees and illegalized migrants are constituting themselves as political subjects in the space of sanctuary cities and thus deny the nation state the authority to decide who is a legitimate member of the polity....Enacting sanctuary policies and practices at the urban scale is an even more serious threat to national sovereignty than church sanctuary because cities provide a territorial legal entity at a different scale at which sovereignty is articulated.

The argument regarding scale—the most fundamental of all arguments, in my opinion—raises the question of what it means to be a nation—indeed, whether the time of the nation-state has run its course—and, more generally, what one understands to be the determinative political entity in society. (One might observe that, ironically, as transnational

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<sup>8</sup> Cited by Bauder from S. Sassen, *Territory, Authority, Rights: From Medieval to Global Assemblages*, updated edition, Princeton: University Press, 2008, 314.

interconnectivity and interdependence rises [especially with the internet], the scalar argument *reduces focus* to virtually the smallest political entity, as the basic and most comprehensive political and governmental unit.) For this reason, the scalar argument is even more foundational than is the legal, constitutional one, also in these United States. And it concerns me greatly. Yet, *at this point*, the argument of scale is virtually hidden from the public's eyes.

#### IV. Conclusion

We have surveyed in this paper many factors related to the sanctuary phenomenon, incarnated in sanctuary cities and in even larger jurisdictions. In the popular mind, as I see it, issues related to community harmony and safety, or to breaking federal immigration law, are generally considered paramount. In fact, while these factors are clearly important, they are of *penultimate* concern. Much more critical, in our constitutional republic, is the question of the relationship between and among local, state, and federal governmental entities, as well as the rights of law enforcement related to each. This matter is the “flip side” of the more general issue of the rule of law. And *even more foundational* than this is the problem of “scale” in immigration policy, a problem that raises the question of the propriety of the existence of the nation-state as such. Let us as Questers not underestimate the profound challenges that lie before us.

Quest Club

February 22, 2019

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