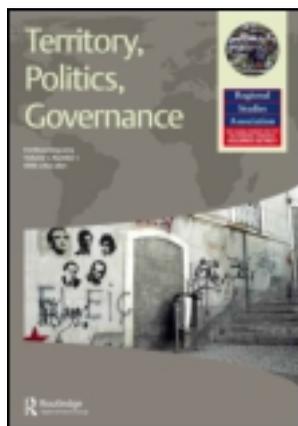


This article was downloaded by: [24.182.17.98]

On: 29 September 2013, At: 18:37

Publisher: Routledge

Informa Ltd Registered in England and Wales Registered Number: 1072954 Registered office: Mortimer House, 37-41 Mortimer Street, London W1T 3JH, UK



## Territory, Politics, Governance

Publication details, including instructions for authors and subscription information:

<http://www.tandfonline.com/loi/rtep20>

### Resisting Federal-Local Immigration Enforcement Partnerships: Redefining 'Secure Communities' and Public Safety

Christopher Strunk<sup>a</sup> & Helga Leitner<sup>b</sup>

<sup>a</sup> Department of Geography, Augustana College, 639 38th Street, Rock Island, IL, 61201, USA

<sup>b</sup> Department of Geography, University of California, 1255 Bunche Hall, BOX 951524, Los Angeles, CA, 90095, USA

Published online: 21 Mar 2013.

To cite this article: Christopher Strunk & Helga Leitner (2013) Resisting Federal-Local Immigration Enforcement Partnerships: Redefining 'Secure Communities' and Public Safety, *Territory, Politics, Governance*, 1:1, 62-85, DOI: [10.1080/21622671.2013.769894](https://doi.org/10.1080/21622671.2013.769894)

To link to this article: <http://dx.doi.org/10.1080/21622671.2013.769894>

PLEASE SCROLL DOWN FOR ARTICLE

Taylor & Francis makes every effort to ensure the accuracy of all the information (the "Content") contained in the publications on our platform. However, Taylor & Francis, our agents, and our licensors make no representations or warranties whatsoever as to the accuracy, completeness, or suitability for any purpose of the Content. Any opinions and views expressed in this publication are the opinions and views of the authors, and are not the views of or endorsed by Taylor & Francis. The accuracy of the Content should not be relied upon and should be independently verified with primary sources of information. Taylor and Francis shall not be liable for any losses, actions, claims, proceedings, demands, costs, expenses, damages, and other liabilities whatsoever or howsoever caused arising directly or indirectly in connection with, in relation to or arising out of the use of the Content.

This article may be used for research, teaching, and private study purposes. Any substantial or systematic reproduction, redistribution, reselling, loan, sub-licensing, systematic supply, or distribution in any form to anyone is expressly forbidden. Terms & Conditions of access and use can be found at <http://www.tandfonline.com/page/terms-and-conditions>

# Resisting Federal–Local Immigration Enforcement Partnerships: Redefining ‘Secure Communities’ and Public Safety

CHRISTOPHER STRUNK and HELGA LEITNER

---

(Received August 2012; in revised form November 2012)

---

**ABSTRACT** Constructing undocumented immigrants as a security threat has allowed the US government to justify extraordinary measures that have pushed immigration enforcement increasingly inward from the border to states, counties, municipalities, and sheriff and police departments. The Secure Communities program, which integrates federal criminal and immigration databases to identify and deport undocumented immigrants, represents only the latest attempt. Most of the academic literature on local immigration enforcement has elaborated on the diffuse, ubiquitous and often paralyzing nature of the biopolitical power of the state vis-à-vis undocumented immigrants. In contrast, in this article, we focus on the contestations that challenge and go beyond repressive state power. We conceive of these not simply as a reaction to state techniques of power, but as productive and affirmative power that promotes alternative imaginaries and institutional change. As the Obama administration has sought to roll out the program to every jurisdiction in the country, it has been met with opposition from immigrant advocates, community leaders, and local law enforcement officials. Using the Washington DC metropolitan area as a case study, we examine the diversity of socio-spatial strategies that advocates have deployed to challenge the Secure Communities program and the articulations of alternative discourses of community and security. We also consider the broader implications of these practices for the immigrant rights advocacy movement and for theorizing resistance. More generally, the case illustrates the efficacy of and the challenges faced by civic activism in contesting dominant modes of governance and systems of authority.

**EXTRACTO** La construcción de que los inmigrantes indocumentados representan una amenaza para la seguridad ha permitido al Gobierno estadounidense justificar medidas extraordinarias y llevar la aplicación de las leyes de inmigración de las fronteras a estados, condados, municipios y los comisariados y departamentos de policía. El programa ‘Comunidades Seguras’ que integra las bases de datos criminales y de inmigración a nivel federal para identificar y deportar a inmigrantes indocumentados representa solamente el último eslabón. La mayor parte de la bibliografía académica sobre la aplicación de las leyes de inmigración se centra en la naturaleza difusa, omnipresente y con frecuencia paralizante del poder biopolítico del Estado frente a los inmigrantes indocumentados. Por el contrario, en este artículo prestamos atención a las impugnaciones que cuestionan y van más allá del poder represivo de un Estado. Concebimos estas impugnaciones no simplemente como una reacción a las técnicas de poder estatal sino más bien como un poder productivo y afirmativo que fomenta los imaginarios alternativos y el cambio institucional. Los intentos de la administración de Obama de extender el programa a cada jurisdicción del país ha provocado protestas por parte de los defensores de los derechos de los inmigrantes, los líderes de

**Author details:** Department of Geography, Augustana College, 639 38th Street, Rock Island, IL 61201, USA. Helga Leitner, Department of Geography, University of California, 1255 Bunche Hall, BOX 951524, Los Angeles, CA 90095, USA. Email: [christopherstrunk@augustana.edu](mailto:christopherstrunk@augustana.edu)

la comunidad y los agentes locales del orden. Considerando el área metropolitana de Washington DC como estudio de caso, analizamos la diversidad de las estrategias socioespaciales con la que los defensores cuestionan el programa ‘Comunidades Seguras’ y las articulaciones de los discursos alternativos sobre comunidad y seguridad. También consideramos qué repercusiones generales tienen estas prácticas para el movimiento de defensa de los derechos de los inmigrantes así como para teorizar la resistencia. En líneas generales, el caso ilustra la eficacia y los retos a los que se enfrenta el activismo cívico al cuestionar los modos dominantes de gobernación y los sistemas de autoridad.

**摘要** 将无证移民建构成对安全的威胁，让美国政府得以正当化将移民执法逐渐从国境向内部伸入各州、郡、市层级的行政司法与警察部门的政策。整合联邦犯罪与移民资料库以指认并遣返无证移民的安全社区计画，仅仅代表了最新的尝试。有关在地移民执法的学术文献，多半详细阐述了国家相对于无证移民所具有的扩散性、无所不在且经常是使之无能为力的生命政治权力本质，但在本文中我们却反向聚焦各种挑战、超越国家压迫力量的争夺。我们不将这些争夺视为仅只是对国家权力技术的反应，而是将之视为鼓励另类想像与制度革新的具有生产性的肯定性权力。当奥巴马执政团队企图在国内的各个法定管辖范围内推动移民计画时，遭遇了来自移民倡议者、社区领导人和在地执法官员的反对。我们以华盛顿特区中的都会区做为案例研究，检视倡议者用以挑战安全社区计画并勾勒另类社区及安全论述的多元社会—空间策略。我们亦将考量此类实践更为广泛的意涵以助益移民权益倡议运动和理论化反抗工作。更广泛而言，该案例勾勒出民权运动争夺支配的治理模式与权威系统的有效性及其所面临的挑战。

**RÉSUMÉ** Présenter les immigrés clandestins comme une menace à la sécurité a permis au gouvernement américain de justifier des mesures exceptionnelles qui ont piloté la mise en oeuvre de la loi sur l’immigration de façon de plus en plus centripète, à savoir de la frontière vers les états, les comtés, les municipalités, et les départements du sheriff et de la police. Le ‘Secure Communities program’ (un programme d’action visant la sécurité des communautés), qui intègre des ensembles de données fédérales sur la criminalité et l’immigration afin d’identifier et d’expulser les immigrés clandestins, ne représente que la tentative la plus récente. La plupart de la documentation spécialisée sur l’application locale de la loi sur l’immigration va plus loin dans les caractéristiques diffuses, omniprésentes et souvent paralysantes du pouvoir biopolitique de l’état vis-à-vis des immigrés clandestins. Par contraste, ce présent article cherche à préciser les contestations qui défient et qui vont au-delà du pouvoir de répression de l’État. On les considère non seulement comme une réaction aux techniques du pouvoir de l’État, mais aussi comme le pouvoir productif et positif qui prône le développement des imaginaires alternatives et le changement institutionnel. Au fur et à mesure que le gouvernement Obama a cherché à mettre en oeuvre le programme d’action dans chaque juridiction du pays, il s’est heurté à l’opposition des partisans, des responsables communautaires et des responsables de l’application de la loi. Employant la zone métropolitaine de Washington DC comme étude de cas, on examine la diversité des stratégies socio-spatiales qu’ont mises en oeuvre les partisans afin d’affronter le ‘Secure Communities program’ et les articulaciones des discours alternatifs quant à la communauté et à la sécurité. On considère aussi les conséquences plus étendues de ces pratiques pour le mouvement pour la défense des droits des immigrés et pour la théorisation de la résistance. De manière plus générale, le cas illustre l’efficacité de l’action civile et les défis auxquels elle fait face au moment où elle conteste les modes de gouvernance et les systèmes d’autorité dominants.

**KEYWORDS** Federal–local partnerships local immigration enforcement Secure Communities program immigrant advocacy networks United States

## INTRODUCTION

Immigration policies in the USA have generally been seen as the purview of the federal government, but over the past decade, localities and states have become increasingly vocal actors in immigration control and reform. During the same time, the federal

government has actively promoted federal–local immigration enforcement partnerships through programs such as Immigration and Nationality Act Section 287(g) and Secure Communities. Beginning in the mid-2000s, municipalities and counties around the United States enacted restrictive housing and immigration enforcement ordinances primarily designed to target undocumented immigrants. More recently, states have implemented their own exclusionary immigration policies. In 2010, Arizona passed Senate Bill 1070, which made unauthorized immigration a state crime and directed state and local law enforcement officials to inquire into the immigration status of anyone suspected of being undocumented. This was followed by similar laws in Georgia, Indiana, South Carolina, and, most recently, Alabama, where state officials also sought to collect data on undocumented immigrants in public schools and prevent immigrants without papers from renting apartments or using municipal services. So far, all of these laws have been challenged in federal court.

These policies are justified on the grounds that undocumented immigrants are a threat to the security of both the external and internal borders of the USA. The blaming of immigration and immigrants for national and local insecurity and criminality has long been a staple for right wing politicians and radio commentators in the USA, but it has reached new heights in the post-9/11 media culture and politics. Documented and undocumented immigrants are blamed for a variety of social ills such as increased crime, swamping schools, abusing the welfare system, and taking jobs away from local residents. Mobilization against undocumented immigration is not always based explicitly around security concerns, but local and national security discourses often become the vessel through which a variety of concerns about immigration are expressed. The production of the undocumented immigrant Other, who poses a (real or perceived) threat to individuals, the local and national communities, is highly racialized, constructing people of non-European ancestry—in particular Muslims and to a lesser extent Latin Americans—as implicit objects of suspicion and threat. NICHOLAS DE GENOVA (2007) suggests that in the post-9/11 era, the US Homeland Security State in its War on Terror has created an association that equates ‘illegal aliens’ with ‘enemy aliens’ (see also MILLER, 2005). In turn, the emergence of such discourses has provided a rationale for anti-immigrant politicians and activists to promote their message about the dangerous migrant, and provided fuel to their campaigns for more restrictive immigration law enforcement to ‘solve the illegal alien problem’.

The Secure Communities program represents only the latest instance of federal–local partnership programs that are supposed to protect American citizens from the dangerous Other by pushing enforcement inward from the borders. The program, started in late 2008, is a far-reaching technological integration of federal criminal and immigration databases that Immigration and Customs Enforcement (ICE) envisions being active in every jurisdiction across the country. Under the Obama administration, Secure Communities has been implemented in 97% of local jurisdictions across the country as of October 2012 (ICE, 2012a). Immigrant enforcement officials have credited the program for the increase in deportations of unauthorized immigrants, which have averaged around 400,000 per year (PRESTON, 2010), but the roll-out of the program has also been met with opposition from immigrant advocates, community leaders, and local law enforcement officials.

In this article, we examine contestations of the Secure Communities program, known to immigrant advocates as S-Comm. We focus on the Washington DC metropolitan area, a hotspot of challenges to the program. Data for this article are drawn primarily from eight months of participant observation and interviews during 2010 and 2011. One of the authors participated in meetings and events held by the Arlington Coalition Against Secure Communities, a coalition of human rights, religious, and

community-based organizations in Northern Virginia working closely with local officials seeking to opt out of the Secure Communities program. The author served as a note taker for the Coalition at monthly meetings, public County Board hearings, private strategy sessions with local elected officials, and meetings with law enforcement officials. He observed protests and participated in several conferences on immigration enforcement and advocacy held in the Washington DC area. He conducted in-depth interviews with Coalition leaders at the beginning and end of the group's activities in Arlington, as well as with advocates involved in similar struggles in the District of Columbia, Maryland, and other jurisdictions in Virginia.<sup>1</sup> These sources of information were supplemented with newspaper articles and policy reports about Secure Communities contestations in other parts of the country during 2010 and 2011. The authors then performed textual analysis of interview transcripts, field notes, and newspaper and policy reports to explore the socio-spatial strategies used by immigrant advocates.

We argue that the mobilization against the Secure Communities program represents a 'counter-power' that contests expanding immigration enforcement inward from the national border and promotes alternative understandings of Secure Communities and public safety. In contrast to totalizing understandings of biopolitical state power, we suggest that immigrant advocates have been able to mobilize diverse constituencies and to insert alternative discourses into public debates. While sharing grievances, different constituencies do not necessarily hold common visions about remedies and strategies, but instead span the spectrum from reformist to radical changes. We contend further that the socio-spatial strategies deployed by immigrant advocacy groups often parallel those of the state and its apparatus, with immigrant advocates laying claim on territory, activating network connections, and adapting scalar strategies that match changing state strategies. We suggest that challenges to the Secure Communities program illustrate both the efficacy of and challenges faced by civic activism in contesting dominant modes of governance and systems of authority.

### BIOPOLITICS, SECURITY, RESISTANCE, AND CONTESTATIONS

The concept of biopolitics as developed by FOUCAULT (2003) is about the

identification, classification, and management of populations in order to ensure that the dimensions of life that are said to define them are amenable to specific forms of governance, systems of belief, and cultural propensities, or what you might want to call 'ways of life'. (GRAYSON, 2008, p. 384)

These practices of identification, classification, and management are localized within the practice of governmentality. Governmentality requires complex security and knowledge apparatuses. Both of these apparatuses do not simply have a positive influence on life, but also have a dark side—simultaneously fostering some lives while abandoning and eradicating others. For example, they may contribute to improving the physical health, welfare, and living conditions of citizens, while at the same time removing and eradicating those individuals that are thought of as a threat to the population. Thus, biopolitics is about protecting the population from danger, including the dangerous Other, in our case the undocumented immigrant. As LIPSCHUTZ (1995, p. 9) argues, 'security ... is meaningless without an "other" to help specify the conditions of insecurity'. Documented and undocumented immigrants are increasingly seen as representing a threat to the population—the nation and its territory (LEITNER, 2012). The mobilization of a sense of threat incites fear, which in turn is used to mobilize support for regulatory interventions.

Constructing undocumented immigrants as a security threat allows the government to justify extraordinary enforcement measures that both involve the bodies of individuals and the border. In the recent past, federal and local officials have thrown their support behind policy changes and enforcement programs that would protect the polity from the dangerous Other and improve public safety. As we discuss below, the 1996 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) resulted in the increased criminalization of non-citizens living in the USA (both undocumented and legal permanent residents). This has been accompanied by federal–local partnerships such as 287(g) and Secure Communities, as well as worksite enforcement programs like E-verify that determine the immigration status of workers through electronic databases. These legal technologies are boosted by biometric technologies that locate border enforcement in the bodies of individuals (STAEHLI *et al.*, 2012). In the case of undocumented immigrants, this has meant identification through finger printing and disciplining through detention and deportation from the national territory. The latter suggests that the ability to locate border enforcement in individual bodies does, however, not mean that it is irrelevant where—within which territory—these bodies are located. Thus, biopolitical power, the control of human bodies/populations, is at the same time about controlling territories or exercising territorial power. This challenges Foucaultian notions that only sovereign power is associated with territory, while biopolitical power transcends boundedness and thus territory. Thus, we contend that biopolitics and territory should be thought together.<sup>2</sup>

There exists by now a sizeable literature in geography, law, and the social sciences on the devolution of immigration control to the local level and federal–local immigration enforcement partnerships (VUKOV, 2003; ACKELSON, 2005; COLEMAN, 2007a, 2009, 2012; VARSANYI, 2007, 2008; WINDERS, 2007; WALKER and LEITNER, 2011). This literature has focused on the deployment of techniques of rule by the state, their impact on migrants, and their spatial inscriptions. It has elaborated on the diffuse, ubiquitous, and often paralyzing nature of the biopolitical power of the state vis-à-vis undocumented immigrants. It has also demonstrated how immigration control has been transformed from policing the external borders of the territory to surveilling migrant populations already present inside the national territory (COLEMAN, 2007a; MARTIN, 2010; VARSANYI, 2010). ELLIS (2006) and WELLS (2004) have drawn attention to uneven geographies of both the politics of immigration and immigration enforcement practices in the USA. While the impact of federal–local partnerships varies geographically, scholars have shown that interior policing operations have made detention and deportation an everyday risk for undocumented populations across the country (COLEMAN, 2009).

Much less attention has been paid until recently to the focus of this article: the different forms of contestations that challenge and go beyond repressive state power. During the past several years, European scholars have started to study and conceptualize mobilizations and advocacy, in particular for asylum seekers and undocumented immigrants (NYERS, 2003; ELLERMAN, 2010; DARLING, 2011; MCGREGOR, 2011; MILLNER, 2011; NICHOLLS, 2012). MCNEVIN (2006), for instance, shows how the claims-making of undocumented migrants in France mobilizes multiple dimensions of political belonging based on international human rights norms and contributions to French society. Research in the USA traditionally focused on naturalization decisions and voting patterns (RAMAKRISHNAN and BLOEMRAAD, 2008), but scholars have recently turned their attention to non-electoral forms of mobilization. Emerging research on ‘migrant civil society’ (THEODORE and MARTIN, 2007) has shown how immigrant-serving community-based organizations have created informal advocacy networks and articulated citizenship claims in response to anti-immigration legislation, particularly during the massive immigrant rights protests in 2006 (see also CORDERO-GUZMÁN *et al.*, 2008;

VOSS and BLOEMRAAD, 2011). However, more empirical and theoretical research is needed to explore the new geographies of contestation within the complicated and rapidly changing ‘multilayered jurisdictional patchwork’ of immigration federalism and enforcement described by VARSANYI *et al.* (2012).

Foucault’s conception of resistance is much less explicit than his discussion of biopolitics, and a number of Foucault scholars have commented on the difficulty of clearly defining and locating his concept of resistance. PICKETT (1996) submits that the concept of resistance gets more attention in the later Foucault—not simply as a negation of power, but as a productive power that frequently also uses techniques of state power. Resistance as counter-power is compatible with a range of political engagements, from individual to collective action to liberal and anarchist positions. This indeterminacy does not mean, however, that Foucault thinks that resistance is futile. To the contrary, he does believe that struggles against the great dangers are an ethico-political obligation. While we concur with this conception of resistance, we favor the term contestation instead of resistance for several reasons. Some scholars (CAMPBELL and HEYMAN, 2007) have recently argued that a focus on the dyad of domination–resistance reduces the complexity and ambiguity of power relations and practices in political struggles. Resistance may not only be the antidote to state power, but it might reinforce it. Furthermore, resistance may also be a productive and affirmative power that can effectuate institutional and systemic change. We contend that the notion of contestations better signals this ambivalence and that counter-power is not simply opposing and challenging dominant modes of governance and systems of authority, but also may promote and enact alternative imaginaries (LEITNER *et al.*, 2008). Contestations accomplish things and leave traces. They may alter the content of discourses, how they circulate, and their effectiveness as well as effecting institutional change, even if they fall short of changing dominant power relations. As we show below, immigrant advocates and activists have challenged discourses that conflate undocumented immigrants with criminality while simultaneously articulating alternative understandings of community and security/public safety. They have facilitated institutional change in some cases through inclusionary measures such as Workers’ Centers and in-state tuition for undocumented students.

Analysts of contestations and contentious politics have shown how geography matters for the dynamics and outcomes of contestations (MILLER, 2000; MARTIN and MILLER, 2003; WAINWRIGHT, 2007; LEITNER *et al.*, 2008). They have demonstrated how a variety of spatialities, such as place, territory, mobility, scale, and networks, are mobilized in political struggles and shape their outcome. As we show below, spatial strategies of extra-local networking and scalar strategies have been crucial for mobilizing opposition and promoting alternatives to the Secure Communities program. Spatial strategies deployed by different actors are, however, constantly adjusted with reference to each other. For example, when local immigrant advocacy movements are constrained by the scalar hierarchy of different tiers of the state, they have worked to overcome such constraints by jumping scales, moving their mobilization from the local to the state scale and back to the local again in their struggle against the roll-out of the program across the US territory.

### **FEDERAL–LOCAL PARTNERSHIPS: BLURRING THE BOUNDARIES BETWEEN IMMIGRATION AND CRIME CONTROL**

Even before fears were set off by 9/11, security concerns about ‘illegal aliens’ were central to passage of the IIRIRA in 1996. By constructing the undocumented immigrant as an undesirable category, the IIRIRA dramatically changed US immigration policy. Policies

associated with this act sought to keep out undesirables through enhanced external border patrol, to curtail rights through expedited deportation proceedings, and to catch undocumented immigrants through screening and the introduction of federal–local immigration enforcement partnerships, most notably in the form of the 287(g) program.

The 287(g) and subsequent Secure Communities program are part of a broader federal effort to extend immigration enforcement inward from the US–Mexican border (COLEMAN, 2007a, 2007b).<sup>3</sup> Although both are federal–local partnerships that target undocumented immigrants detained by local officials for deportation, the programs differ in how immigrants are identified by federal agents. Under the 287(g) program, local officials are trained in immigration enforcement and are authorized to initiate deportation proceedings. During its first ten years of existence, the 287(g) program has attracted controversy over concerns that it may lead to racial profiling (see COLEMAN, 2012 for a discussion of these critiques). Criticism has not only come from immigrant advocates and policy organizations, but also the Office of the Inspector General at the Department of Homeland Security (DHS) (OIG, 2010a, 2010b) and local police officers (MAJOR CITIES CHIEFS, 2006). In contrast, under the Secure Communities program, local officials forward arrest data to federal immigration authorities, who then identify potential unauthorized immigrants.

The Secure Communities program was initiated under the Bush administration in late 2008 but has expanded rapidly under Obama. By August 2012, Secure Communities has been activated in more than 3000 jurisdictions across the country, and the program is scheduled to be used nation-wide by 2013. As of 31 July 2012, more than 212,000 immigrants have been deported through the program (ICE, 2012b). ICE has marketed the Secure Communities program as primarily an information-sharing program that promotes ‘biometric interoperability’ between Federal Bureau of Investigation (FBI) and DHS databases. The program operates by running the fingerprints of all persons arrested by local law enforcement officials and booked into jails through the United States Visitor and Immigrant Status Indicator Technology’s (US-VISIT) Automated Biometric Identification System (IDENT), a database operated by ICE. When fingerprints match those of an unauthorized immigrant who is eligible for removal (known as a ‘hit’), ICE sends a request (known as a ‘detainer’) asking the local jail to hold the individual until federal immigration officials can take them into custody.<sup>4</sup>

The focus on information-sharing allows ICE to promote the Secure Communities program, in part, as a technological fix to the existing immigration enforcement system. Federal immigration officials emphasize that Secure Communities employs cutting-edge biotechnologies (biometric measures) to locate ‘criminal aliens’ and merge criminal and immigration databases (ICE, 2010a, 2010b). Images of fingerprints form the background of agency press releases and fact sheets. By emphasizing the high-tech nature of the program, ICE argues that Secure Communities effectively takes the responsibility for immigration enforcement away from local officials, a common complaint of law enforcement agencies about other partnership programs (MAJOR CITIES CHIEFS, 2006; MALINA, 2009). Because fingerprinting and data sharing with the FBI is already an established process for most local law enforcement agencies, ICE insists, sheriff and police departments are not forced to use additional resources for immigration enforcement.

Furthermore, officials argue that there can also be no racial profiling because the fingerprints of every detainee regardless of race or ethnicity are taken during the booking process (ICE, 2010b). In a fact sheet entitled ‘What Others are Saying,’ ICE collects quotes from local officials supportive of Secure Communities, most of whom argue that the program is a fair tool to identify immigration status (ICE, 2011a). In other words, technology acts as a check on any potential police prejudice. Finally, ICE

claims that the program focuses only limited federal government resources on identifying and deporting dangerous criminals. This is accomplished through a three-level classification system of criminals in which Level 1 and Level 2 offenders (those that have committed the most serious offenses such as homicide, kidnapping, and sexual assault (Level 1) and property crimes and repeat misdemeanors (Level 2)) are given priority for detention and deportation over less serious Level 3 offenders and non-criminals (immigrants who are never actually convicted of a crime) (ICE, 2010a; see also WASLIN, 2011). However, despite frequent references to the prioritization of criminal aliens, ICE officials have subsequently admitted that the agency will deport any undocumented immigrants that it comes into contact with (field notes: Wilson Center Conference on 287(g) and Secure Communities, Washington DC, September 2010).

As Varsanyi and her colleagues have shown, the expansion of the 287(g) and Secure Communities programs relies on collaboration from local sheriff and police departments, causing immigration enforcement to resemble more of a ‘patchwork of overlapping and potentially conflicting authority than a systematic approach’ (2012, p. 138). But despite the real differences in how federal–local partnerships operate, the devolution of immigration enforcement has resulted broadly in the increased surveillance of immigrants living within the territorial USA (COLEMAN, 2009, 2012). Discourses and practices of state security are not just about border enforcement or foreign policy, therefore, but are also techniques of governing immigrants and their families within everyday spaces (see also MILLER, 2005). This transformation of governance has been accomplished through several immigration law reforms that constructed a legal framework within which all immigrants convicted of ‘aggravated felonies’ became eligible for detention and deportation without the mechanisms for relief normally available to immigrants (MILLER, 2005).<sup>5</sup> Under the 1996 IIRIRA, the category of aggravated felonies was greatly expanded and crimes committed in the past by non-citizen immigrants, including legal permanent residents and those on track to become citizens, retroactively became deportable offenses (MILLER, 2005). The result is that not only are undocumented immigrants increasingly insecure in their daily routines, particularly on their way to and from work (COLEMAN, 2012), but legal permanent residents are also in danger of being deported for a variety of minor crimes. Since approximately one-third of unauthorized immigrants live in mixed-status families where one or more family members are US citizens or legal residents (PASSEL, 2006), the expansion of immigration enforcement has created fear and mistrust throughout immigrant communities.

Federal–local partnerships as well as ICE workplace raids increased dramatically after the 9/11 attacks, further blurring previous boundaries between immigration enforcement and crime control. The Obama administration has shifted away from large-scale workplace raids towards less visible audits and policing strategies, but has continued to deport immigrants at a record pace of approximately 400,000 per year. In response to these changing enforcement policies and their impact on immigrant communities, advocates began to focus more attention on challenging federal–local partnerships like the Secure Communities program (Interview with human rights advocate, Washington DC, September 2010).

## **MAKING OUR COMMUNITIES SAFE: MOBILIZING AGAINST S-COMM**

In this section, we examine the arguments and socio-spatial strategies that immigrant rights advocates have employed against the Secure Communities program. We focus on the Washington DC metropolitan area, where coalitions in the District of Columbia, Arlington (Virginia), and Montgomery County (Maryland) have opposed the program’s

implementation, but also discuss advocacy networks in other cities. In seeking to opt out of S-Comm, advocates have articulated counter-discourses that promote an alternative understanding of public safety and contest the increasingly common link between undocumented migration and security threats. The mobilization has led the DHS to adopt a number of reforms to the Secure Communities program, although many advocates have them deemed insufficient. This suggests that governmentality is not all encompassing, but also that the counter-power of immigrant advocates constantly runs up against and is shaped by dominant power structures. As a result, advocates are forced to use flexible strategies that take into account shifting state strategies in different geographical jurisdictions and at different geographic scales.

*Opting Out: Battling ICE in the Washington DC Metropolitan Area*

In late 2009, advocates in Washington DC were shocked to find out that the District of Columbia's police chief had signed a Secure Communities Memorandum of Agreement (MOA) with ICE because of the city's long-standing opposition to local immigration enforcement (Interview with community activist, Washington DC, September 2010; Field notes: Turning the Tide conference, Arlington, Virginia, May 2011). Little was known about Secure Communities at this point, and local organizations only learned of the program through the National Day Laborer Organizing Network (NDLON) (Interview with community activist, Washington DC, September 2010). After researching the program, civil rights organizations, labor groups, and immigrant organizations began to mobilize and reach out to local officials in the District. Much of this organizing work was done by advocates against domestic violence, who are particularly concerned about the potential impact of the Secure Communities program. Victims of domestic violence face a number of challenges and may be even less inclined to call the police if they are worried about being deported or even having their partners removed from the USA (Interviews with advocates against domestic violence, Washington DC, September 2010).

During the spring, advocates worked to develop good relationships with city council members and the District's Police Chief. Although the Police Chief continued to support the Secure Communities program throughout the campaign, advocates said that she listened to their concerns about domestic violence and actually proposed a number of changes in the program (Interviews with advocates against domestic violence, Washington DC, September 2010). City council members were also receptive to the arguments advanced by advocates, particularly after the passage of S.B. 1070 in Arizona revived contentious debates over immigration in the Washington DC metropolitan area (Interview with community activist, Washington DC, September 2010). Concerns that local involvement in immigration enforcement would create fear among immigrant communities convinced DC city council members to support the DC Secure Communities Act of 2010, a May 2010 resolution opposing the program. Following the passage of the resolution in June, the Police Chief reluctantly agreed to end the implementation of the program. Even though ICE has prevented other local jurisdictions from opting out, it did not immediately attempt to force DC to rejoin the program, which advocates attributed to its unique situation as a federal district (Field notes: Arlington Coalition meeting, August 2010).

As the campaign against S-Comm unfolded in the District, ICE officials moved to enroll every Virginia jurisdiction in the program. Although several localities in Northern Virginia, including the large inner suburb of Fairfax County, were already participating in the program, immigrant advocates and local officials knew little about Secure

Communities as it began to be implemented across Virginia in April 2010 (Interview with community activist, Falls Church, Virginia, September 2010). In early spring, ICE announced that Arlington and Alexandria, two liberal Northern Virginia suburbs, would now be participating in the program.

In Arlington, a densely populated and highly diverse inner suburb just across the Potomac River from the District of Columbia, officials complained that they were not consulted and cautiously expressed their opposition to the local enforcement of federal laws. Much of this opposition was initially articulated by Walter Tejada, a member of the Arlington County Board of Supervisors. Tejada was born in El Salvador and as of 2010 was the only Latino County Board member in Virginia. Following Arlington's enrollment into the Secure Communities program, Tejada held a Latino Roundtable community meeting in April 2010. The police chief and sheriff attended the meeting and faced questions from community members who were concerned about the involvement of county officials in federal immigration enforcement. When law enforcement officials asserted that they had not voluntarily joined the program, advocates and community members in Arlington began to gather basic information about how the Secure Communities program functions, its impact in other jurisdictions, and how advocates in the District of Columbia had sought to challenge the program (Field notes: Arlington Coalition meeting, August 2010).

During the spring and summer of 2010, a diverse coalition of faith-based and human rights advocacy groups in Arlington formed to oppose S-Comm. Unlike the Washington DC coalition, no domestic violence groups were involved. Most advocates were based in Arlington, but some also came from neighboring jurisdictions. Because of its location in the inner-ring suburbs of Washington, immigrant advocates in Arlington were also able to draw on their connections to advocates in the District of Columbia and other jurisdictions in Northern Virginia, some of whom live in Arlington. This effort was led by an organizer from a community-based organization in neighboring Alexandria, which often collaborates on trainings and organizing campaigns with immigrant-serving organizations in Arlington and other localities. The announcement of Arlington's participation in the Secure Communities program created fear within Latino communities in Northern Virginia and led the organization to reach out to other advocates in the region. More importantly, however, the organization saw Arlington as an ideal testing ground for a larger campaign against S-Comm (Interview with community activist, Falls Church, Virginia, September 2010).

Arlington is widely seen as the most liberal jurisdiction in Virginia and has a history of welcoming policies towards immigrants. The County funds a day laborer center and employs bilingual aides in every county school (Interviews with community activists, Arlington, Virginia, April 2011). In the midst of debates over restrictive local immigration ordinances in Prince William County, an outer suburb several miles south along I-95, Arlington's County Board of Supervisors passed a unanimous resolution in 2007 recognizing the contributions of immigrants to the county (TEJADA 2007). If Arlington could be convinced to opt out of Secure Communities, advocates reasoned, other neighboring jurisdictions in Virginia might follow (Field notes: Arlington Coalition meeting, August 2010).

Advocates in Arlington employed a variety of strategies to garner public support for a local challenge to Secure Communities. Now calling themselves the Arlington Coalition Against the Secure Communities Program,<sup>6</sup> advocates met privately with the County Sheriff and Police Chief to relay their concerns about the program. During these meetings, advocates told stories about increasing fear among immigrants across the county and cited declining enrollment numbers at English as a Second Language courses. They

predicted that immigrant communities would be less likely to report crimes to local law enforcement officials and shared critical statements about Secure Communities from other parts of the country. Finally, advocates provided elected officials with information about alternative forms of implementing the program and updates about the possibility of opting out of Secure Communities altogether.<sup>7</sup> While the Sheriff and Police Chief were sympathetic to the concerns of advocates and opposed to local enforcement of immigration laws, they balked at publicly opposing a federal law enforcement program and declining to share information with other enforcement agencies (Field notes: Arlington Coalition meetings, August and September 2010).

After learning that opting out of the program was possible, advocates in Arlington began mobilizing for a County Board resolution in September 2010. During the late summer, the Coalition held several strategy sessions with Tejada and the County's legislative liaison. Advocates organized a petition drive and spoke out against the Secure Communities program at a public County Board meeting in September, where they again highlighted reports of increasing fear among immigrant communities and emphasized their concerns that Arlington's well-deserved image as a welcoming community was being damaged by local involvement in federal immigration enforcement. At the end of the month, Arlington's County Board of Supervisors approved a unanimous resolution (5-0) stating their opposition to the Secure Communities program and requesting a meeting with ICE to discuss leaving the program (ARLINGTON COUNTY BOARD OF SUPERVISORS, 2010). Notably, the information gathered by national advocates about opting out was cited directly in the County Board's resolution and played a central role in convincing Tejada's fellow board members to support the resolution (Field notes: Arlington Coalition meeting, October 2010). Typical of their strategies during the campaign, immigrant advocates and labor union allies filled the County Board room with supporters and gave interviews to local Spanish-language media that were asked to attend the event.

Advocates and local officials in Montgomery County, an inner suburb in Maryland, also mobilized against the proposed implementation of the Secure Communities program. CASA de Maryland, the state's largest immigrant advocacy organization, pressured allies on the County Board to oppose the program with protests and petition drives (CASA DE MARYLAND, 2011). The organization also highlighted personal stories of undocumented immigrants caught up in the program in neighboring Prince George's County, focusing in particular on a victim of domestic violence who was identified through Secure Communities and was scheduled to be deported.<sup>8</sup> In April, Montgomery County Board members issued a series of strong statements against S-Comm and adopted a resolution that called for improved public safety (MONTGOMERY COUNTY, 2011), although they declined to openly challenge Secure Communities after ICE officials asserted that the county could not opt out of the program.

Immigrant advocates in the Washington DC metropolitan area were able to challenge the Secure Communities program because of favorable local political opportunity structures. The District of Columbia and surrounding inner-ring suburbs like Arlington have a long history of liberal politics and support for immigrant rights, including sanctuary city policies in DC, Takoma Park, and Prince George's County. This history of immigrant settlement resulted in a dense network of immigrant organizations, churches, and labor unions that advocates could call on to support direct action protests and petition drives. Advocates also drew on long-standing relationships with local elected officials like Walter Tejada in Arlington. This dense network of advocates and allies was strengthened further by Washington DC's unique position as the national capital and home to national immigrant advocacy organizations, some of which participated directly in local

campaigns against S-Comm. But despite these favorable conditions, local advocacy efforts in turn were challenged and often overridden by federal agencies.

Almost immediately after Arlington's resolution was passed, an ICE official told the *Washington Post* that the Secure Communities program was actually NOT meant to be optional (VEDANTAM, 2010a). The unnamed ICE source was quoted as saying:

Secure Communities is not based on state or local cooperation in federal law enforcement. The program's foundation is information sharing between FBI and ICE. State and local law enforcement agencies are going to continue to fingerprint people and those fingerprints are forwarded to FBI for criminal checks. ICE will take immigration action appropriately.

This seemed to represent a reversal of ICE's previous position (see documents on the opt-out controversy at the Uncover the Truth website (<http://uncoverthetruth.org>)) and led Congresswoman Zoe Lofgren to later call for an investigation into ICE's statements (ROMNEY, 2011). Surprised, local officials and advocates asked for a meeting with ICE. In early 2011, Arlington County finally received an official answer from ICE that the county could in fact not opt out of the program (Field notes: Arlington Latino Roundtable meeting, April 2011). Faced with a conservative governor, state attorney general, and House of Delegates that supported increased immigration enforcement, Arlington officials agreed to continue sending fingerprints to Virginia's criminal justice division and largely dropped their efforts to leave the program. As we discuss below, however, advocates continued to contest the Secure Communities program in other parts of the Washington DC metropolitan area and around the country.

#### *Counter-Arguments and Diversity of Immigrant Advocacy*

In their campaigns against S-Comm, immigrant advocates and their allies have employed a diversity of socio-spatial strategies to contest federal–local immigration enforcement partnerships. While some advocates have sought to reform enforcement policies, others are staunchly opposed to any local involvement in immigration enforcement. But even as groups have taken different positions, they have expressed broadly similar critiques of S-Comm.

In Arlington and other cities across the USA, advocates and local law enforcement officials have fundamentally questioned the claims about the Secure Communities program marshaled by federal immigration officials. The most prominent critique, marshaled effectively by the Arlington Coalition, has been that the program will in fact undermine public safety because immigrants will be less likely to communicate with police or assist in crime investigations if local officials are seen to be working with federal immigration agents (MAJOR CITIES CHIEFS, 2006; HENNESSEY, 2011; RIGHTS WORKING GROUP, 2011). Advocates have directly challenged ICE's assertion that identifying and deporting undocumented immigrants will result in greater security for residents, often referring to the program as 'so-called Secure Communities' or 'Insecure Communities' (FELTZ and BAKSH, 2010). In Illinois and California, advocates and lawmakers have used similar language (the SMART Enforcement Act and the TRUST Act, respectively) in promoting bills that emphasize an alternative approach based on positive police–community relationships.<sup>9</sup>

This argument clearly recalls the sanctuary city movement in the 1980s, when churches and other advocates successfully pressed for ordinances prohibiting local officials from inquiring into the immigration status of migrants fleeing war and repressive regimes in Central America (COUTIN, 1993; WELLS, 2004). It also has renewed currency

because of public support for the goals of community policing, which has become commonplace in police departments across the country as a response to concerns about 'poor police–community relations' (HERBERT, 2006, p. 20). Despite important variations, community policing is characterized by three common features: (1) administrative decentralization; (2) greater community engagement; and (3) problem-solving approaches based on crime prevention (SKOGAN, 2006). Although community policing is popular, critics have argued that despite some successes, the strategy is largely ineffective in reducing crime or promoting greater community engagement (HERBERT, 2006), particularly in poorer and immigrant communities (SKOGAN, 2006). Regardless, both immigrant advocates and local law enforcement officials have emphasized the importance of building trust between the police and immigrant residents (WASLIN, 2011). In a number of local jurisdictions, advocates have worked to solicit and publicize statements of high-profile police chiefs and sheriffs (particularly San Francisco Sheriff Mike Hennessey) who oppose the Secure Communities program because of its potential to undermine community policing and as a consequence, make communities less safe.

At the same time, many advocates are distrustful of expanded policing power. Some human rights groups have suggested that racial profiling is as likely to occur under the Secure Communities program as it has under other federal–local immigration enforcement partnerships (RIGHTS WORKING GROUP, 2010). Since all persons detained and booked into jail are checked for immigration status violations, advocates have argued that local law enforcement officials may be tempted to arrest those seen as potentially undocumented. In some cases, investigations have shown that Latinos are targeted for arrest while driving or performing other daily activities (FELTZ, 2011). An October 2011 report by the Warren Institute suggests that Latinos are indeed overrepresented in arrests through the program (KOHLI *et al.*, 2011). Studies have also shown sharp increases in arrests of Hispanics in jurisdictions with similar federal–local partnerships such as the CAP (GARDNER and KOHLI, 2009) or the 287(g) program (COLEMAN, 2012).

Advocates around the country have voiced similar critiques of the Secure Communities program, but they have at times employed different strategies and proposed different solutions. Some local officials and advocates have suggested that they are supportive of ICE's *stated* goal of targeting criminal aliens. During his defense of Arlington's resolution, Walter Tejada emphasized the County's tough approach to criminal immigrants and argued that he was also ready to lock them up (Field notes: Arlington County Board meeting, September 2010). Critics like Tejada are primarily concerned about the wide net cast by the Secure Communities program and the misuse of valuable resources by pursuing immigrants that are not a threat to local communities, and have called for reforms that target serious offenders and not Level 3 offenders and non-criminals.

Federal immigration officials have repeatedly insisted that Secure Communities prioritizes serious offenders (ICE, 2010b), but immigrant rights and community organizations contend that most immigrants deported through the program have actually been lower level offenders and non-criminals (NATIONAL IMMIGRATION FORUM, 2011). This claim was greatly strengthened by a Freedom of Information Act request obtained by advocates in August 2010 that showed that the majority of immigrants targeted for deportation under Secure Communities have been Level 3 offenders and non-criminals (CENTER FOR CONSTITUTIONAL RIGHTS, 2010). Recent data have shown a similar trend. According to ICE's inter-operability statistics released on 31 August 2011, only 26% of the 134,378 individuals deported under the program since 2008 have been Level 1 offenders convicted of serious crimes. In contrast, almost 60% of immigrants processed through the program were guilty of committing a misdemeanor offense or were never charged with a

crime (ICE, 2011b; see KOHLI *et al.*, 2011 for more analysis of these statistics).<sup>10</sup> In response, advocates in Arlington and other cities have proposed reforms where authorities would only check fingerprints for those actually convicted of crimes instead for all detainees.<sup>11</sup>

While these proposals have been the most common challenge to the Secure Communities program, some advocates fear that they divide immigrants into two categories: those that are worthy of civil rights in the USA and those who are less worthy. On the one side, hard-working parents, spouses, and non-criminals are seen as valued members of local communities; on the other side are those convicted of crimes. In order to gain support for their cause, advocates often place hard-working immigrant parents or non-criminals swept up by law enforcement at the center of their campaigns. This leaves those convicted of crimes less likely to be recognized as community members or to be defended by advocates (Interview with human rights advocate, Washington DC, September 2010). Linking criminal activity with deportation also denies the possibility of forgiveness for crimes committed, since once immigrants are deported they are all but denied a chance to return to their lives in the USA.

As the campaign against S-Comm expanded, a small number of advocacy organizations, particularly legal aid and detention groups, have not only challenged the division between deserving and undeserving immigrants, but have cautiously begun to push back against the broader expansion of the criminal justice system in recent decades (FEI, 2011). Ad hoc local coalitions composed of elected officials, law enforcement, and immigrant advocates in several cities have directly challenged ICE's practice of issuing detainers to local jails to hold immigrants until they can be picked up by federal immigration officials. This strategy was discussed early on in the Arlington campaign but was abandoned in the face of opposition from the county's sheriff and other elected officials. However, advocates in other jurisdictions have been successful in changing local policy. Citing prohibitive and unreimbursed costs, in 2011 San Francisco, Cook County (IL) and Santa Clara all announced that they would no longer honor ICE detainers for certain low-level offenders (BEGIN, 2011; MITCHELL, 2011; ESQUIVEL, 2011a). The District of Columbia's City Council adopted similar legislation limiting the District's response to detainer requests to adults who have committed dangerous crimes (WASLIN, 2012). These localities continue to have sanctuary city policies on the books and have called on them for moral authority in opposing federal–local partnerships (ASSOCIATED PRESS, 2011).

In campaigns across the country, immigrant advocates have employed a diverse set of counter-arguments and strategies to challenge the Secure Communities program. While they are all critical of the program, strategies have ranged from demanding minor reforms to complete opposition to federal–local immigration enforcement partnerships, seen in the attempts of Arlington and the District of Columbia to withdraw completely from the Secure Communities program. At the same time, these strategies are dependent on local and regional political opportunity structures encountered by immigrant advocates, and advocates have occasionally shifted their spatial strategies to different scales in response to frequent rule changes by ICE officials.

### EXPANDING THE CHALLENGE: NETWORKED MOBILIZATION ACROSS JURISDICTIONS AND SCALES

The Secure Communities program may be the most ambitious effort to achieve full immigration enforcement coverage across the country, but this ambition has been challenged by immigrant advocacy groups and networks operating at multiple scales: the

local, regional, and national. In this section, we show how advocates are involved in regional and national networks that allow them to draw on extra-local resources and learn from each other. Such advocacy networks tend to emerge in contingent ways, generally in response to a particular issue. Their scope and boundaries are often fluid and they operate across jurisdictions and across different scales of governance. It is this fluidly networked mobilization that allows advocates to shift their scalar strategies quickly in order to respond to changing political opportunity structures.

We have argued that a number of favorable local political opportunity structures in the Washington DC metropolitan area facilitated mobilization and the construction of broad coalitions against the Secure Communities program. At the same time, opportunity structures at the national level limited the effectiveness of these campaigns and pushed immigrant advocates to adapt different socio-spatial strategies. Thus, while it is important to acknowledge that the favorable conditions of Washington DC are not present in many other parts of the country, we argue that immigrant advocates in a variety of places have had some success in challenging enforcement partnerships by drawing on external resources and tapping into national networks.

During the campaigns in the Washington area, connections within the metropolitan region and networks that stretched as far as the Bay Area in California were important. On the same day that Arlington County voted to opt out of the Secure Communities program, Santa Clara, CA, passed a similar resolution. While advocates did not directly coordinate their efforts, they discussed strategies and shared resources. For instance, critical public statements by San Francisco Sheriff Hennessey were employed repeatedly to bolster the Arlington Coalition's case about the potential negative effects of the program (Field notes: Arlington Coalition meeting, September 2010).

Following the passage of Arlington's resolution, the Coalition was contacted for advice by advocates from around the country (Field notes: Arlington Coalition meeting, October 2010). The ability of advocates in Arlington, Santa Clara, and San Francisco to convince local officials to publicly oppose the Secure Communities program had the effect of mobilizing opposition elsewhere. In December 2010, Cambridge (Massachusetts) passed a similar resolution attempting to opt out of the program (NANOS, 2010) while Providence (Rhode Island) followed in March 2011 (HING, 2011). Throughout the 2010–2011 winter and spring, advocates in New York City organized marches and protests to pressure Mayor Bloomberg and Governor Patterson (and later Andrew Cuomo) to oppose the program (FABIAN, 2010; see Figure 1).

National organizations played a crucial role in helping to coordinate actions and share resources among local advocacy networks and particular campaigns. NDLON was particularly important in this regard. NDLON's organizer in Washington DC directly assisted with the campaigns in the District and Arlington and helped to connect advocates with Bay Area organizations (Interview with human rights advocate, Washington DC, September 2010). NDLON also sponsored 'Turning the Tide' conferences in New Orleans (2010) and Arlington (2011) that brought immigrant advocates together from across the country. Face-to-face meetings at conferences are particularly important because they offer advocates a chance to network and learn about strategies and tactics to challenge the Secure Communities program and other immigration enforcement policies in a variety of environments. Despite real constraints of distance and time, therefore, immigrant advocates constructed information sharing and strategy networks that led to sustained and coordinated challenges to S-Comm across jurisdictional boundaries and different scales of governance.



Figure 1. State and local jurisdictions that have challenged the Secure Communities program, as of December 6, 2011. Map by the University of Minnesota Cartography Lab.

The failure of Arlington and other localities to leave the Secure Communities program convinced advocates across the country that a different scalar strategy was needed. Some openly argued for a national strategy against S-Comm (Field notes: Arlington Coalition meeting, September 2010), while others looked toward state capitols where most MOAs with ICE are actually negotiated. Most early agreements were signed with localities, but in 2010 ICE began an aggressive push to expand Secure Communities across the country by signing up entire states.

In response, advocates began focusing their efforts in spring 2011 on statewide bills that would end the program or allow localities to opt out of S-Comm. In Illinois, the Chicago-based Illinois Coalition for Immigrant and Refugee Rights lobbied the governor's office to support the SMART Enforcement Act, which would have implemented new regulations for local participation in immigration enforcement. Advocates had hoped to win support for this measure but were surprised when Governor Pat Quinn announced that Illinois would go further and actually end the state's participation in Secure Communities on the grounds that the program primarily accosts people with only minor convictions or no criminal record (Field notes: Turning the Tide conference, Arlington, Virginia, April 2011). As with local efforts to opt out, the actions of Illinois had an immediate impact on other states. Only one month later in June 2011, the governors of New York and Massachusetts also announced that their states would also suspend the Secure Communities program (SEMPLE, 2011). Much like the aftermath of Arlington's campaign, ICE immediately challenged these attempts to opt out. As reported in the *Boston Globe* (SACCHETTI and BIERMAN, 2011), an administration official announced that states could not leave the program after Governor Patrick's decision in Massachusetts. Even though Washington DC and Washington State were able to initially avoid participating in Secure Communities, ICE insisted that all states and

jurisdictions would eventually be forced to join the program by 2013. In June 2011, ICE announced a series of reforms to the program in response to critics. The reforms include a new policy not to deport victims and witnesses of crimes (particularly domestic violence), greater prosecutorial discretion for ICE attorneys, more resources for training, and a new advisory committee of stakeholders to look into complaints (BAHRAMPOUR, 2011). Most immigrant rights advocates rejected the reforms as insufficient (SEGE, 2011). In August 2011, ICE announced the termination of the 39 MOAs already signed with states to avoid further confusion about the mandatory nature of Secure Communities, arguing that federal officials do not need state and local permission to implement the program (BENNETT, 2011).

After finding themselves unable to opt out of the program locally and at the state level, immigrant advocates applied increased pressure on officials in Washington DC. In June 2011, the DHS created a task force in response to critics of Secure Communities. When the task force expressed serious concerns about the program but failed to call for its suspension in September, advocates once again shifted their spatial strategies to refocus on the local level. As explained above, this strategy has centered on contesting ICE detainers in San Francisco, Cook County (Chicago), Santa Clara, and the District of Columbia. While these policy changes challenge the link between the criminal justice system and federal immigration policy, they are currently limited to liberal cities with large immigrant populations and progressive elected and law enforcement officials and are unlikely to succeed in more conservative jurisdictions, at least under the current political climate.

Local social movements may be constrained by the scalar hierarchy of different tiers of the state, but the opposition to S-Comm has worked to overcome these constraints by jumping scales. Thus, while much of the onus for immigration reform continues to lie on Washington, the campaign against the Secure Communities program shows that the impetus for reform may come from below. In response to federal-local immigration partnerships, diverse coalitions of immigrant advocacy organizations, churches, law enforcement officials, and local elected officials have constructed dynamic and far-reaching networks that are demanding institutional change and promoting alternative understandings of community and public safety.

## CONCLUSIONS

Since 2008, a diverse group of actors has contested the roll-out of the Secure Communities program, arguing that rather than making communities more secure it has: (1) undermined public safety by making immigrants afraid to report crimes or assist in police investigations; (2) isolated immigrants from the broader community; (3) inserted fear into immigrant communities; and (4) led to the deportation of thousands of undocumented immigrants, separating families and imposing hardship on children and their parents. Attending to these contestations renders a different assessment of the program than the one provided by its proponents at the federal and local level, who claim that the deployment of cutting-edge technologies to identify criminal aliens will enhance the safety of citizens from criminals and invaders.

Our case study demonstrates that civic activism is not simply a reaction to state techniques of power, but rather is a productive and affirmative counter-power. It challenges the dominant system of authority to varying degrees and promotes and enacts alternative imaginaries/understandings of community and security. The counter-power is not homogenous and also not without ambivalence, in particular with respect to the remedies sought. Some contestants seem to be satisfied with reformist remedies and have called for minor reforms to the Secure Communities program, most notably to only target

immigrants who are convicted of crimes. In contrast, other advocates consider such changes as inadequate and unacceptable. They argue that distinguishing between deserving and non-deserving immigrants, who merit differential rights, validates the exclusionary logic of citizenship. For these advocates, universal principles of human rights—embodied in the slogan ‘No Human Being is Illegal’—and not exclusionary citizenship policies should be the guide for the treatment of undocumented immigrants.

Further, while challenges are based in a general language of rights, they also involve a more general appeal to inclusion of all residents within local and national communities. Instead of targeting unauthorized immigrants for deportation, advocates insist that localities should be focused on more fully integrating immigrants. In several states, opposition to the Secure Communities program has been explicitly tied to campaigns for pro-immigrant legislation such as the DREAM Act, which refers to federal legislation that would allow a limited number of undocumented immigrants a path to citizenship. Even though Congress has repeatedly failed to pass the DREAM Act, Illinois, California, and Maryland have passed similar or expanded legislation in recent years (in 2012, the Obama administration announced a Deferred Action policy that would halt deportations for undocumented young adults meeting the provisions of the DREAM Act). By contesting the link between undocumented migration and security threats, advocates have sought to promote a positive and more inclusive vision of immigrants as contributors to healthy and welcoming communities. Immigrants are not seen as a threat, but rather as a vital part of the economy, the state, and society

They don't want to shoot us or kill us or blow us up. They only want to weed our gardens, clean our houses, and cook our meals in search of the American Dream. They must be recognized as Americans making a vital impact and contribution. (LAKOFF and FERGUSON, 2006, p. 3)

We show how immigrant advocates have challenged immigration enforcement partnerships by devising a diverse set of socio-spatial strategies that take advantage of existing resources, knowledge pools, and which respond to changing state political opportunity structures. Socio-spatial strategies of immigrant advocates and immigration officials are constantly adjusted with reference to each other. As advocates have challenged the Secure Communities program, the DHS and ICE have adjusted their strategies to expand and strengthen immigration enforcement efforts.

What has the mobilization against the Secure Communities program actually accomplished? Even though advocates have been unable to end the program, their flexible and creative strategies have broadened the opposition to S-Comm and raised serious questions about its future. As advocates attempted to opt out of the program, they have successfully called and pushed for a number of minor reforms. Over the course of 2011, ICE reaffirmed its policy of prosecutorial discretion and convened a task force composed of law enforcement officials and advocates who were charged with implementing changes (ESQUIVEL, 2011b) and members of Congress have also called for an investigation into the program (ROMNEY, 2011). While most advocates contend that these steps are inadequate, they represent an increasing recognition of concerns about the program. In turn, this has led several cities to adopt policies that challenge ICE detainees, a central part of S-Comm.

More broadly, advocates have been able to insert alternative discourses of security, public safety, community, and belonging into immigration debates even as they are constrained by the power of the federal government, thus reasserting the broader message of the immigrant rights movement. Indeed, the campaign against the Secure Communities

program is very much part of the larger immigrant rights movement in the USA, but with distinct characteristics. Campaigns against S-Comm across the country have been led almost entirely by local grassroots movements in collaboration with local elected and law enforcement officials, rather than with traditional mainstream and national immigrant rights groups. Thus, mobilizations around S-Comm largely avoid the much-discussed cleavages between mainstream and grassroots organizations by collaborating with a variety of local actors.

Immigrant advocates have chosen to confront federal immigration agencies through a pragmatic oppositional politics that seeks to both reform and end federal-local enforcement partnerships. By opposing S-Comm, advocates are challenging the expansion of biopolitical power through increasing control and surveillance of immigrant bodies in new territories. Crucially, this pushback is occurring on the terrain of federal-local partnerships, but is drawing on extra-local resources as advocates mobilize and connect across different localities and at multiple scales. Advocates are also promoting a more inclusive understanding of citizenship and community through alternative ways of ensuring public safety. The current dominance of conservative politics has so far limited advocates' successes to liberal cities and states with a strong immigrant rights presence, but the movement represents a new and potentially strong challenge to the expansion of immigration enforcement.

**Acknowledgments** – We would like to thank the members of the Arlington Coalition Against Secure Communities for their support of this research; Mat Coleman and Walter Nichols for their helpful comments on an earlier draft of this paper; and Mark Lindberg and the University of Minnesota Cartography Lab for the map production. The research for this paper was supported by the Graduate Research Partnership Program from the College of Liberal Arts, University of Minnesota, Minneapolis.

## NOTES

1. Interviews are cited in the text without identifying names to ensure anonymity. Participant observations are cited in the text as field notes.
2. We would like to thank Mat Coleman for this suggestion.
3. There are currently 14 different federal-local partnerships under the ICE ACCESS (Agreements of Cooperation in Communities to Enhance Safety and Security) initiative. We focus on the Secure Communities program because it is the broadest and the most controversial partnership program. For information on the Criminal Alien Program (CAP), which is in place in all federal and state prisons and 300 local jails, see GUTTIN (2010) and GARDNER and KOHLI (2009).
4. Detainees that are serving sentences for crimes committed in local jurisdictions are transferred to ICE custody once their sentence ends (WASLIN, 2011).
5. Under immigration law, aggravated felonies are current or past convictions for crimes (including misdemeanors) that result in a sentence of more than one year.
6. Hereafter referred to as the Arlington Coalition or the Coalition. The name was the subject of some debate among advocates, several of whom argued that they did not want to be seen as opposing the idea of making communities secure and only were against the program. In the end, the name was not changed, although advocates continually expressed their frustration with ICE's choice of name for the program.
7. Advocates in the Arlington Coalition drew on information gathered by three key national organizations: the National Day Laborer Organizing Network, based in Los Angeles but with an organizer in Washington DC, the Center for Constitutional Rights in New York City, and the Benjamin Cardozo School of Law, also in New York City. These organizations used FOIA requests to pressure ICE into admitting that localities could decline to participate in the Secure Communities program in August 2010, a claim DHS would later retract.

8. The story of Maria Bolaños was publicized in the *Washington Post* (VEDANTAM, 2010b), in an activist video (CENTER FOR CONSTITUTIONAL RIGHTS, 2011), and by CASA de Maryland advocates during a planned public questioning of an ICE official at a Wilson conference on 287(g) and Secure Communities held in the District of Columbia (Field notes: Wilson conference, September 2010).
9. The SMART Enforcement Act, passed by the Illinois House and Senate in 2011, allowed localities to decide whether to participate in Secure Communities, provide greater oversight and accountability, and required that the program only target convicted criminals (ICIRR, 2011). The TRUST Act, passed by the California General Assembly but vetoed by Governor Brown in September 2012, would have limited the Secure Communities program to immigrants convicted of a crime and imposed new requirements designed to prevent racial profiling (FOLEY, 2012).
10. ICE interoperability statistics from July 2012 show a very slight increase in the number of Level 1 offenders as a percentage of immigrants deported under the Secure Communities program to 28% (ICE, 2012b).
11. Advocates in the Arlington Coalition based this proposal on the El Paso County Sheriff's Department, which participates in Secure Communities but does not send the fingerprints of Class C and other low-level misdemeanor offenders to ICE. This proposal had limited success in Arlington because of a state law requiring all fingerprints to be sent to the Virginia State Police, where they are then checked against the DHS database (Field notes: Arlington Coalition meeting, August 2010).

## REFERENCES

- ACKELSON J. (2005) Constructing security on the U.S.–Mexico border, *Political Geography*, **24(2)**, 164–184.
- ARLINGTON COUNTY BOARD OF SUPERVISORS (2010) *Resolution Promoting Community Safety in Accordance with Constitutional Principles* (available at: <http://www.arlingtonva.us/departments/CountyBoard/proclamations/page78364.aspx>) (accessed on 6 July 2011).
- ASSOCIATED PRESS (2011) SF sheriff wants to use new immigration policy to comply with city's Sanctuary law, *Washington Post*, 31 May (available at: [http://www.washingtonpost.com/national/sf-sheriff-wants-to-use-new-immigration-policy-to-comply-with-city-sanctuary-law/2011/05/30/AGndJwEH\\_story.html](http://www.washingtonpost.com/national/sf-sheriff-wants-to-use-new-immigration-policy-to-comply-with-city-sanctuary-law/2011/05/30/AGndJwEH_story.html)) (accessed on 3 June 2011).
- BAHRAMPOUR T. (2011) ICE reforms secure communities program, *Washington Post*, 17 June (available at: [http://www.washingtonpost.com/local/ice-reforms-secure-communities-program/2011/06/17/AGMJkaZH\\_story.html](http://www.washingtonpost.com/local/ice-reforms-secure-communities-program/2011/06/17/AGMJkaZH_story.html)) (accessed on 8 August 2011).
- BEGIN B. (2011) San Francisco County jail won't hold inmates for ICE, *San Francisco Examiner*, 5 May (available at: <http://www.sfexaminer.com/local/2011/05/san-francisco-county-jail-won-t-hold-inmates-ice>) (accessed on 6 May 2011).
- BENNETT B. (2011) Secure communities program can operate without state approval, governors are told, *Los Angeles Times*, 6 August (available at: <http://articles.latimes.com/2011/aug/06/nation/la-na-secure-communities-20110806>) (accessed on 8 August 2011).
- CAMPBELL H. and HEYMAN N. (2007) Slantwise: beyond domination and resistance on the border, *Journal of Contemporary Ethnography*, **36(1)**, 3–30.
- CASA DE MARYLAND (2011) *Press Release: Montgomery County Council Introduces Resolution Against Discredited Immigration Program 'Secure Communities'*, 26 April (available at: <http://casademaryland.org/news-archive/1478-press-release-montgomery-county-council-introduces-resolution-against-discredited-immigration-program-secure-communities>) (accessed on 27 April 2011).
- CENTER FOR CONSTITUTIONAL RIGHTS (2010) *Groups Call 'Secure Communities' Program a Racial Profiling Dagnet That Undermines Community Policing and Public Safety*, 10 August (available at: <http://ccrjustice.org/newsroom/press-releases/rights-groups-release-documents-u.s.-immigration-and-customs-enforcement-%28ice%29-agency-foia-lawsuit>) (accessed on 5 July 2011).
- CENTER FOR CONSTITUTIONAL RIGHTS (2011) *Insecure Communities: Families Under Threat Documentary* (available at: <http://blip.tv/center-for-constitutional-rights/insecure-communities-families-under-threat-english-subtitles-5121746>) (accessed on 9 July 2011).

- COLEMAN M. (2007a) Immigration geopolitics beyond the Mexico–US border, *Antipode*, **39**(1), 54–76.
- COLEMAN M. (2007b) A geopolitics of engagement: neoliberalism, the war on terrorism, and the reconfiguration of US immigration enforcement, *Geopolitics* **12**(4), 607–634.
- COLEMAN M. (2009) What counts as the politics and practice of security, and where? Devolution and immigrant insecurity after 9/11, *Annals of the Association of American Geographers* **99**(5), 904–913.
- COLEMAN M. (2012) The ‘local’ migration state: the site-specific devolution of immigration enforcement in the U.S. South, *Law & Policy* **34**(2), 159–190.
- CORDERO-GUZMÁN H., MARTIN N., QUIROZ-BECERRA V. and THEODORE N. (2008) Voting with their feet: nonprofit organizations and immigrant mobilization, *American Behavioral Science* **52**(4), 598–617.
- COUTIN S. B. (1993) *The Culture of Protest: Religious Activism and the U.S. Sanctuary Movement*, Westview Press, Boulder, CO.
- DARLING J. (2011) Domopolitics, governmentality and the regulation of asylum accommodation, *Political Geography* **30**(5), 263–271.
- ELLERMAN A. (2010) Undocumented migrants and resistance in the liberal state, *Politics & Society* **38**(3), 408–429.
- ELLIS M. (2006) Unsettling immigrant geographies: U.S. immigration and the politics of scale, *Tijdschrift voor Economische en Sociale Geografie* **97**(1), 49–58.
- ESQUIVEL P. (2011a) Santa Clara County to stop honoring immigration detainees for low-level offenders, *Los Angeles Times*, 18 October (available at: <http://latimesblogs.latimes.com/lanow/2011/10/santa-clara-county-to-stop-honoring-immigration-detainers-for-low-level-offenders-.html>) (accessed on 1 December 2011).
- ESQUIVEL P. (2011b) Report criticizes deportation program, urges changes, *Los Angeles Times*, 16 September (available at: <http://www.latimes.com/news/local/la-me-secure-communities-20110916,0,2657234.story>) (accessed on 20 September 2011).
- FABIAN M. (2010) Immigrant advocates to Paterson: rescind secure communities, *Feet in Two Worlds Blog*, 19 October (available at: <http://news.feetintwoworlds.org/2010/10/19/immigrant-advocates-to-paterson-rescind-secure-communities/>) (accessed on 29 July 2011).
- FEI M. (2011) Opinion: let’s fix ’96 & stop the deportation machinery, *Detention Watch Network*, 1 October (available at: <http://detentionwatchnetwork.wordpress.com/2011/10/01/opinion-let%e2%80%99s-fix-%e2%80%9996-stop-the-deportation-machinery/#more-3601>) (accessed on 9 December 2011).
- FELTZ R. (2011) Driving while immigrant, *The Nation*, 8 July (available at: <http://www.thenation.com/article/161868/driving-while-immigrant>) (accessed on 9 July 2011).
- FELTZ R. and BAKSH S. (2010) Video: immigration crackdown creates insecure communities, *PBS*, 19 August (available at: <http://www.pbs.org/wnet/need-to-know/security/video-immigration-crackdown-creates-insecure-communities/2964/>) (accessed on 23 August 2011).
- FOLEY E. (2012) TRUST Act to limit secure communities heads to California Governor, *Huffington Post*, 24 August (available at: [http://www.huffingtonpost.com/2012/08/24/trust-act-bill-california-governor\\_n\\_1829125.html](http://www.huffingtonpost.com/2012/08/24/trust-act-bill-california-governor_n_1829125.html)) (accessed on 9 September 2012).
- FOUCAULT M. (2003) The birth of biopolitics, in ROSE N. and RABINOW P. (Eds) *The Essential Foucault: Selections from Essential Works of Foucault 1954–1984*, pp. 202–207. The New Press, New York.
- GARDNER II. T. and KOHLI A. (2009) *The C.A.P Effect: Racial Profiling in the ICE Criminal Alien Program*. Chief Justice Earl Warren Institute on Law and Social Policy, Berkeley, CA (available at: [http://www.law.berkeley.edu/files/policybrief\\_irving\\_FINAL.pdf](http://www.law.berkeley.edu/files/policybrief_irving_FINAL.pdf)) (accessed on 5 October 2010).
- DE GENOVA N. (2007) The production of culprits: from deportability to detainability in the aftermath of ‘Homeland Security’, *Citizenship Studies* **11**(5), 421–448.
- GRAYSON K. (2008) Human security as power/knowledge: the biopolitics of a definitional debate, *Cambridge Review of International Affairs* **21**(3), 383–401.

- GUTTIN A. (2010) *The Criminal Alien Program: Immigration Enforcement in Travis County, Texas*. The Immigration Policy Center, Washington, DC (available at: [http://www.immigrationpolicy.org/sites/default/files/docs/Criminal\\_Alien\\_Program\\_021710.pdf](http://www.immigrationpolicy.org/sites/default/files/docs/Criminal_Alien_Program_021710.pdf)) (accessed on 5 October 2010).
- HENNESSEY M. (2011) Secure communities destroys public trust, *The San Francisco Chronicle*, 1 May (available at: <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/05/01/INB81J8OCL.DTL>) (accessed on 3 May 2011).
- HERBERT S. (2006) *Citizens, Cops, and Power: Recognizing the Limits of Community*. University of Chicago Press, Chicago.
- HING J. (2011) Providence says no to secure communities, *Colorlines*, 9 March (available at: [http://colorlines.com/archives/2011/03/providence\\_rhode\\_island\\_says\\_no\\_to\\_secure\\_communities.html](http://colorlines.com/archives/2011/03/providence_rhode_island_says_no_to_secure_communities.html)) (accessed on 4 April 2011).
- ICE (2010a) Secure Communities Standard Operating Procedures. U.S. Immigrations and Customs Enforcement, Washington, DC (available at: <http://trac.syr.edu/immigration/reports/234/include/securecommunitiesops93009.pdf>) (accessed on 5 July 2011).
- ICE (2010b) Secure Communities: Setting the Record Straight. U.S. Immigrations and Customs Enforcement, Washington, DC (available at: <http://www.nilc.org/immlawpolicy/LocalLaw/ice-scomm-setting-record-straight-2010-08-17.pdf>) (accessed on 7 August 2011).
- ICE (2011a) What Others are Saying. U.S. Immigrations and Customs Enforcement, Washington, DC (available at: <http://www.ice.gov/doclib/secure-communities/pdf/what-others-say.pdf>) (accessed on 5 July 2011).
- ICE (2011b) IDENT/IAFIS Interoperability Statistics. U.S. Immigrations and Customs Enforcement, Washington, DC (available at: [http://www.ice.gov/doclib/foia/sc-stats/nationwide\\_interoperability\\_stats-fy2012-to-date.pdf](http://www.ice.gov/doclib/foia/sc-stats/nationwide_interoperability_stats-fy2012-to-date.pdf)) (accessed on 9 December 2011).
- ICE (2012a) Activated Jurisdictions, U.S. Immigrations and Customs Enforcement (available at: <http://www.ice.gov/doclib/secure-communities/pdf/sc-activated.pdf>) (accessed on 13 October 2012).
- ICE (2012b) IDENT/IAFIS Interoperability Statistics. U.S. Immigrations and Customs Enforcement, Washington, DC (available at: [http://www.ice.gov/doclib/foia/sc-stats/nationwide\\_interoperability\\_stats-fy2012-to-date.pdf](http://www.ice.gov/doclib/foia/sc-stats/nationwide_interoperability_stats-fy2012-to-date.pdf)) (accessed on 13 October 2012).
- ILLINOIS COALITION FOR IMMIGRANT AND REFUGEE RIGHTS (ICIRR) (2011) Smart Enforcement passes Illinois House 66–43, 6 May (available at: <http://icirr.org/content/smart-enforcement-passes-illinois-house-66-43>) (accessed on 6 July 2011).
- KOHLI A., MARKOWITZ P. L. and CHAVEZ L. (2011) *Secure Communities by the Numbers: An Analysis of Demographics and Due Process*. Chief Justice Earl Warren Institute on Law and Social Policy, Berkeley, CA (available at: [http://www.law.berkeley.edu/files/Secure\\_Communities\\_by\\_the\\_Numbers.pdf](http://www.law.berkeley.edu/files/Secure_Communities_by_the_Numbers.pdf)) (accessed on 9 December 2011).
- LAKOFF G. and FERGUSON S. (2006) *The Framing of Immigration*. The Rockridge Institute, Berkeley, CA.
- LEITNER H. (2012) Spaces of encounters: immigration, race, class and the politics of belonging in small town America, *Annals of the Association of American Geographers* **102**(4), 828–846.
- LEITNER H., SHEPPARD E. and SZIARTO K. (2008) The spatialities of contentious politics, *Transactions of the Institute of British Geographers* **33**, 157–172.
- LIPSCHUTZ R. (Ed.) (1995) On security, *On Security*, pp. 1–23. Columbia University Press, New York.
- MAJOR CITIES CHIEFS (2006) *M.C.C. Immigration Committee Recommendations for Enforcement of Immigration Laws by Local Police Agencies*, Salt Lake City (available at: [http://www.houstontx.gov/police/pdfs/mcc\\_position.pdf](http://www.houstontx.gov/police/pdfs/mcc_position.pdf)) (accessed on 2 June 2011).
- MALINA M. (2009) *The Role of Local Police: Striking a Balance Between Immigration Enforcement and Civil Liberties*. The Police Foundation, Washington, DC (available at: <http://www.policefoundation.org/content/role-of-local-police>) (accessed on 5 October 2010).
- MARTIN L. L. (2010) Bombs, bodies, and biopolitics: securitizing the subject at the airport security checkpoint, *Social & Cultural Geography* **11**(1), 17–34.
- MARTIN D. G. and MILLER B. (2003) Space and contentious politics, *Mobilization: An International Journal* **8**(2), 143–56.

- McGREGOR J. (2011) Contestations and consequences of deportability: hunger strikes and the political agency of non-citizens, *Citizenship Studies* **15(5)**, 597–611.
- McNEVIN A. (2006) Political belonging in a neoliberal era: the struggle of the sans-papiers, *Citizenship Studies* **10(2)**, 135–151.
- MILLER B. (2000) *Geography and Social Movements: Comparing Antinuclear Activism in the Boston Area*. University of Minnesota Press, Minneapolis, MN.
- MILLER T. (2005) Blurring the boundaries between immigration and crime control after September 11, *Boston College Third World Law Journal* **25**, 81–124.
- MILLNER N. (2011) From ‘refugee’ to ‘migrant’ in Calais solidarity activism: re-staging undocumented migration for a future politics of asylum, *Political Geography* **30**, 320–328.
- MITCHELL C. (2011) County starts freeing inmates wanted by ICE, *WBEZ*, 9 September (available at: <http://www.wbez.org/story/county-starts-freeing-inmates-wanted-ice-91808>) (accessed on 13 September 2011).
- MONTGOMERY COUNTY (2011) Montgomery council approves resolution advocating for consistent implementation of the ‘Secure communities’ program in county, 4 May (available at: [http://www.montgomerycountymd.gov/Apps/Council/PressRelease/PR\\_details.asp?PrID=7555](http://www.montgomerycountymd.gov/Apps/Council/PressRelease/PR_details.asp?PrID=7555)) (accessed on 29 July 2011).
- NANOS B. P. (2010) Cambridge resists ‘mandatory’ immigration enforcement measure, *Cambridge Chronicle*, 21 December (available at: <http://www.wickedlocal.com/cambridge/news/x1882974432/Cambridge-resists-mandatory-immigration-enforcement-measure>) (accessed on 22 December 2010).
- NATIONAL IMMIGRATION FORUM (2011) Cosmetic changes are not enough: secure communities program needs sweeping reform, 19 July (available at: <http://www.immigrationforum.org/blog/display/cosmetic-changes-are-not-enough-secure-communities-program-needs-sweeping-r/>) (accessed on 7 August 2011).
- NICHOLLS W. (2012) The immigrant rights movement after comprehensive immigration reform: from centralized to decentralized struggle, Unpublished manuscript.
- NYERS P. (2003) Abject cosmopolitanism: the politics of protection in the anti-deportation movement, *Third World Quarterly* **24(6)**, 1069–1093.
- OIG (2010a) *The Performance of 287(g) Agreements Report*. Office of the Inspector General, Department of Homeland Security, Washington, DC.
- OIG (2010b) *The Performance of 287(g) Agreements Report Update*. Office of the Inspector General, Department of Homeland Security, Washington, DC.
- PASSEL J. (2006) *The Size and Characteristics of the Unauthorized Migrant Population in the U.S.* Pew Hispanic Center, Washington, DC (available at: <http://www.pewhispanic.org/2006/03/07/size-and-characteristics-of-the-unauthorized-migrant-population-in-the-us/>) (accessed on 7 August 2011).
- PICKETT B. (1996) Foucault and the politics of resistance, *Polity* **XXVIII(4)**, 445–466.
- PRESTON J. (2010) Deportations from U.S. hit a record high, *The New York Times*, 7 October, A21 (available at: [http://www.nytimes.com/2010/10/07/us/07immig.html?\\_r=0](http://www.nytimes.com/2010/10/07/us/07immig.html?_r=0)) (accessed on 14 October 2010).
- RAMAKRISHNAN S.K. and BLOEMRAAD I. (Eds) (2008) *Civic Hopes and Political Realities: Immigrants, Community Organizations, and Political Engagement*. Russell Sage Foundation, New York.
- RIGHTS WORKING GROUP (2010) *Faces of Racial Profiling: A Report from Communities Across America*, Rights Working Group, Washington, DC (available at: <http://www.rightsworkinggroup.org/content/rights-working-group-applauds-governor-cuomo-suspending-secure-communities-initiative-new-yo>) (accessed on 15 October 2010).
- RIGHTS WORKING GROUP (2011) *Rights Working Group Applauds Governor Cuomo for Suspending the Secure Communities Initiative in New York State*, 1 June (available at: <http://www.rightsworkinggroup.org/content/rights-working-group-applauds-governor-cuomo-suspending-secure-communities-initiative-new-yo>) (accessed on 8 August 2011).
- ROMNEY L. (2011) Congresswoman calls for investigation of enforcement program that screens for illegal immigrants in jails, *Los Angeles Times*, 22 April (available at: <http://latimesblogs>).

- latimes.com/lanow/2011/04/congresswoman-calls-for-investigation-of-enforcement-program-that-screens-for-illegal-immigrants-in-.html) (accessed on 25 April 2011).
- SACCHETTI M. and BIEMAN N. (2011) US overrules Patrick on immigration, *Boston Globe*, 7 June (available at: [http://www.boston.com/news/local/massachusetts/articles/2011/06/07/us\\_overrules\\_patrick\\_on\\_immigration/](http://www.boston.com/news/local/massachusetts/articles/2011/06/07/us_overrules_patrick_on_immigration/)) (accessed on 7 June 2011).
- SEGE A. (2011) Critics seek to stem deportations after U.S. boots thousands, *Sacramento Bee*, 22 July (available at: <http://www.sacbee.com/2011/07/22/3788136/critics-seek-to-stem-deportations.html>) (accessed on 23 July 2011).
- SEMPLE K. (2011) Cuomo Pulls New York From U.S. Fingerprint Checks, *The New York Times*, 1 June (available at: [http://www.nytimes.com/2011/06/02/nyregion/cuomo-pulls-new-york-from-us-fingerprint-checks.html\\_r=1&ref=nyregion](http://www.nytimes.com/2011/06/02/nyregion/cuomo-pulls-new-york-from-us-fingerprint-checks.html_r=1&ref=nyregion)) (accessed on 2 June 2011).
- SKOGAN W. G. (2006) *Police and Community in Chicago: A Tale of Three Cities*. Oxford University Press, New York.
- STAEHELI L., EHRKAMP P., LEITNER H. and NAGEL C. (2012) Dreaming the ordinary: daily life and the complex geographies of citizenship, *Progress in Human Geography* **35**(5), 628–644.
- TEJADA W. (2007) *Remarks at Center for American Progress presentation, Local Immigration Ordinances: The Result of Federal Inaction on Comprehensive Reform*, 8 August (available at: <http://www.americanprogress.org/events/2007/08/immtranscript.pdf>) (accessed on 7 August 2011).
- THEODORE N. and MARTIN N. (2007) Migrant civil society: new voices in the struggle over community development, *Journal of Urban Affairs* **29**(3), 269–287.
- VARSANYI M. (2007) Documenting undocumented migrants: the matriculas consulares as neoliberal local membership, *Geopolitics* **12**(2), 299–319.
- VARSANYI M. (2008) Immigration policing through the backdoor: city ordinances, the ‘Right to the city’, and the exclusion of undocumented day laborers, *Urban Geography* **29**(1), 29–52.
- VARSANYI M. (Ed.) (2010) *Taking Local Control: Immigration Policy Activism in U.S. Cities and States*. Stanford University Press, Palo Alto, CA.
- VARSANYI M., LEWIS P. G., PROVINE D. M. and DECKER S. (2012) A multilayered jurisdictional patchwork: immigration federalism in the United States, *Law & Policy* **34**(2), 138–158.
- VEDANTAM S. (2010a) No opt-out for immigration enforcement, *Washington Post*, 1 October (available at: <http://www.washingtonpost.com/wp-dyn/content/article/2010/09/30/AR2010093007268.html>) (accessed on 4 October 2010).
- VEDANTAM S. (2010b) Call for help leads to possible deportation for Hyattsville mother, *Washington Post* (available at: <http://www.washingtonpost.com/wp-dyn/content/article/2010/11/01/AR2010110103073.html>) (accessed on 1 November 2010).
- VOSS K. and BLOEMRAAD I. (Eds) (2011) *Rallying for Immigrant Rights: The Fight for Inclusion in 21st Century America*. University of California Press, Berkeley, CA.
- VUKOV T. (2003) Imagining communities through immigration policies, *International Journal of Cultural Studies* **6**(3), 335–353.
- WAINWRIGHT J. (2007) Spaces of resistance in Seattle and Cancun, in LEITNER H., PECK J. and SHEPPARD E. (Eds) *Contesting Neoliberalism: Urban Frontiers*, pp. 179–203. Guilford, New York.
- WALKER K. and LEITNER H. (2011) The variegated landscape of local immigration policies in the United States, *Urban Geography* **32**(2), 1–23.
- WASLIN M. (2011) *The Secure Communities Program: Unanswered Questions and Concerns (updated)*, Immigration Policy Center, Washington, DC (available at: [http://www.immigrationpolicy.org/sites/default/files/docs/Secure\\_Communities\\_112911\\_updated.pdf](http://www.immigrationpolicy.org/sites/default/files/docs/Secure_Communities_112911_updated.pdf)) (accessed on 7 December 2011).
- WASLIN M. (2012) DC passes act limiting district’s response to ICE’s immigration detainees, *Immigration Impact*, 5 June (available at: <http://immigrationimpact.com/2012/06/05/dc-passes-act-limiting-districts-response-to-ices-immigration-detainers/>) (accessed on 20 October 2012).
- WELLS M. J. (2004) The grassroots reconfiguration of U.S. immigration policy, *International Migration Review* **38**(4), 1308–1347.
- WINDERS J. (2007) Bringing back the (b)order: post 9/11 politics of immigration, borders, and belonging in the contemporary U.S. South, *Antipode* **39**(5), 920–942.