

CONCURRENCE IN SENATE AMENDMENTS

AB 1806 (Gabriel and Carrillo)

As Amended August 18, 2026

Majority vote

SUMMARY

Requires a state prosecutor to conduct an independent investigation into an immigration enforcement officer-involved shooting resulting in the death of an unarmed civilian.

Senate Amendments

- 1) State that the Legislature intends that the Attorney General (AG) shall exercise all lawful power and authority to provide transparency and protect constitutional rights in situations involving immigration enforcement officer-involved shootings that result in the death of unarmed civilians.
- 2) Broaden the scope of this bill to apply to investigations of immigration enforcement officer-involved shootings generally, rather than only federal immigration enforcement officer-involved shootings.
- 3) Specify that investigations of immigration enforcement officer-involved shootings resulting in the death of a civilian are required only when the civilian was unarmed.
- 4) Require any state prosecutor investigation of an immigration enforcement officer-involved shooting to be consistent with specified existing procedures that apply to a state prosecutor investigation into incidents of an officer-involved shooting resulting in the death of an unarmed civilian.
- 5) State that if the state prosecutor is prevented from accessing witnesses, documents, or evidence, such that an independent, transparent, and thorough investigation is not possible, the state prosecutor shall document those facts.
- 6) State that this bill shall not be interpreted to regulate the conduct of federal agents or to in any way impose obligations that would violate the Supremacy Clause of the United States Constitution, and in all respects this bill shall be interpreted to comply with the Supremacy Clause of the United States Constitution.
- 7) Add a severability clause.

COMMENTS

As Passed by the Assembly, this bill: Required a state prosecutor to conduct an independent investigation into a federal immigration enforcement officer-involved shooting resulting in the death of a civilian.

Major Provisions

- 1) Required a state prosecutor to conduct an independent, transparent, and thorough investigation into incidents of a federal immigration enforcement officer-involved shooting resulting in the death of a civilian.

- 2) Required the state prosecutor to do all of the following:
 - a) Investigate and gather facts in an incident involving a shooting resulting in the death of a civilian by a federal immigration enforcement officer.
 - b) For all investigations conducted, prepare and submit a written report, which shall include, at a minimum, a statement of the facts and a detailed analysis and conclusion for each investigatory issue.
 - c) If criminal charges against the involved officer are found to be warranted, initiate and prosecute a criminal action against the officer.
- 3) Required the state prosecutor to post and maintain on a public internet website each written report prepared by the state prosecutor, as specified, appropriately redacting any information in the report that is required by law to be kept confidential.
- 4) Specified that the Attorney General (AG) is the state prosecutor unless otherwise specified or named.
- 5) Specified that this does not limit the AG's authority under the California Constitution or any applicable state law.
- 6) Included a severability clause.

According to the Author

"California must take decisive action to ensure accountability when federal immigration agents use deadly force against civilians. AB 1806 would grant the California Attorney General clear authority to investigate any shooting incidents involving federal immigration agents and members of the public. The state has both a moral and legal obligation to protect its residents and uphold the rule of law."

Arguments in Support

According to Service Employees International Union (*SEIU*) *California*, "[AB 1806] would require that the California Attorney General conduct an independent, transparent, and thorough investigation into any incident involving a shooting of a civilian by federal immigration enforcement agents.

"SEIU's workforce has identified protecting the civil and human rights of immigrants broadly and immigrant workers specifically as a top legislative priority. Immigration and Customs Enforcement (ICE) raids continue to adversely affect the lives of our members, their workplaces, and the communities in which they live, and it is imperative that state authorities investigate the types of incidents covered under this bill to ensure impartiality under the law.

"The 2025 immigration enforcement surge has led to an unprecedented increase in civilian shootings by immigration agents. An investigative report by the Wall Street Journal identified 13 instances of immigration agents firing at or into civilian vehicles across the country since July 2025. These incidents resulted in four deaths and at least five of those shot were U.S. citizens.

"Two of the most high-profile cases involve the deaths of two American citizens in Minneapolis, Minnesota. Renee Nicole Good, a 37-year-old mother of three, was fatally shot by an ICE agent

on January 7th, and Alex Pretti, an ICU nurse, was fatally shot by a Customs and Border Patrol (CBP) officer on January 24th. The U.S. Department of Justice declined to open an investigation into the agent that killed Renee Good, and state officials reported being barred from receiving any evidence from the FBI. Similarly, in Alex Pretti's case, state authorities were blocked from accessing the crime scene by Homeland Security officials.

"In both the Good and Pretti cases, the federal government defended the shootings, characterizing the victims as violent agitators. These claims were publicly disputed by video evidence, local law enforcement, and independent analyses. The Trump administration has signaled to agents that they have "federal immunity," creating a culture of few checks on the use of deadly force during enforcement operations.

"California has already established a framework for independent investigation of officer-involved shootings. AB 1806 extends that same proven framework to shootings by federal immigration agents operating in California."

Arguments in Opposition

According to the *SFV Alliance*, "This legislation only applies to immigration enforcement officers involved shootings. No other suspected crimes of Federal Law enforcement agents.

"We see this legislation as a continuous attack by the legislators on those enforcing federal Immigration laws. We could go into the many reasons why we see enforcement of immigration laws to be power struggles of party politics but it would not be relevant to this legislation.

"Criminal investigations can be complex. The state creating its own investigation could lead to the undermining of the integrity of the federal Department of Justice's legal process. We feel that the state investigation would be motivated by punishment for immigration officers for enforcement of federal laws and not to find criminal behavior. State Attorney General participation may result in proprietorial misconduct, as they might not adhere to the same standards and obligations as federal prosecutors, potentially jeopardizing the fairness of the case and ultimately allowing those who violated the law under the color of authority to evade justice that the Federal investigators could have impose.

"The author stated in the Assembly Public Safety Committee that "the Federal Government not only failed to investigate, but it also apparently attempted to thwart other agencies from doing so"

"Witnessing federal investigations, we have seen that they do take a longer time to investigate a case and bring the perpetrators to justice. While we appreciate the desire to bring swift prosecutions, it is not always in the best interest of the people to move too quickly. We would encourage the legislators and members of the public to have patience in the investigations by allowing Federal investigators their process and not try to help when it can be detrimental to the prosecutions of those that deserve justice.

"State prosecutors should avoid involvement in the legal policies of federal investigations. With the current State administration and attorney general, we view any investigation into federal immigration agents as being bias with an emotional desire for punishment when logically none should or could be warranted."

FISCAL COMMENTS

According to the Senate Appropriations Committee, "Estimated \$5 million in FY 2026-27 and \$10 million annually thereafter to hire, train and be prepared to respond promptly to up to ten shootings anywhere in the state, as well as anticipated litigation that may arise out of the state's efforts to investigate and prosecute federal agents. (General Fund)"

VOTES:**ASM PUBLIC SAFETY: 7-2-0**

YES: Schultz, Mark González, Haney, Harabedian, Nguyen, Ramos, Sharp-Collins

NO: Alanis, Lackey

ASM APPROPRIATIONS: 11-4-0

YES: Wicks, Aguiar-Curry, Calderon, Caloza, Fong, Mark González, Krell, Pacheco, Pellerin, Sharp-Collins, Solache

NO: Hoover, Dixon, Ta, Tangipa

ASSEMBLY FLOOR: 59-20-1

YES: Addis, Aguiar-Curry, Ahrens, Alvarez, Arambula, Ávila Farías, Bains, Bauer-Kahan, Bennett, Berman, Boerner, Bonta, Bryan, Calderon, Caloza, Carrillo, Connolly, Elhawary, Fong, Gabriel, Garcia, Gipson, Mark González, Haney, Harabedian, Hart, Irwin, Jackson, Kalra, Krell, Lee, Lowenthal, McKinnor, Muratsuchi, Nguyen, Ortega, Pacheco, Papan, Patel, Pellerin, Petrie-Norris, Quirk-Silva, Ramos, Ransom, Michelle Rodriguez, Rogers, Blanca Rubio, Schiavo, Schultz, Sharp-Collins, Solache, Soria, Stefani, Valencia, Ward, Wicks, Wilson, Zbur, Rivas

NO: Alanis, Castillo, Chen, Davies, DeMaio, Dixon, Ellis, Flora, Gallagher, Jeff Gonzalez, Hadwick, Hoover, Johnson, Lackey, Macedo, Patterson, Sanchez, Ta, Tangipa, Wallis

ABS, ABST OR NV: Celeste Rodriguez

UPDATED

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