

ASSEMBLY THIRD READING  
AB 2662 (Carrillo)  
As Amended April 6, 2026  
Majority vote

## SUMMARY

Establishes the Working Group on Civil Rights Accountability.

### Major Provisions

- 1) Requires, on July 1, 2027, the Working Group on Civil Rights Accountability to be established within the Department of Justice (DOJ).
- 2) Establishes that the purpose of the working group is to monitor, document, analyze, and report on alleged violations of constitutional and civil rights arising from immigration enforcement activities conducted within the state by federal agencies, including, but not limited to, United States Immigration and Customs Enforcement (ICE), United States Customs and Border Protection (CBP), the United States Border Patrol, the United States Department of Homeland Security (DHS), and the Federal Bureau of Investigation (FBI).
- 3) Requires the working group to provide recommendations to the Legislature and the Attorney General to strengthen oversight, improve data transparency, and protect the civil and constitutional rights of individuals and communities impacted by immigration enforcement activities.
- 4) Requires the working group to consist of 12 members appointed as specified.
- 5) Requires each appointing authority to ensure that its appointees collectively reflect expertise in constitutional law, civil rights enforcement, public accountability, labor and workforce impacts, public health, education, and community-based oversight.
- 6) Requires each member appointed to possess demonstrated expertise in one or more specified areas and to serve a two-year term at the pleasure of their appointing authority.
- 7) Requires the members of the working group to elect a chair and vice chair from among its membership.
- 8) Requires the working group to meet at least quarterly.
- 9) Requires the working group to develop and maintain a statewide reporting dashboard to document and categorize alleged constitutional or civil rights violations arising from federal immigration enforcement activities within the state.
- 10) Requires the Department of Justice to establish standards, submission protocols, and data verification procedures for nonprofit organizations authorized to submit reports to the dashboard. Makes a nonprofit organization eligible to submit reports to the dashboard if it meets specified qualifications.
- 11) Requires the dashboard to include specified data fields.

- 12) Requires the working group to submit annually on January 1, beginning January 1, 2028, pursuant to Government Code Section 9795, and make that report publicly available. Requires the report to summarize documented trends, geographic patterns, systemic concerns, and policy recommendations to safeguard constitutional and civil rights within the state.

## COMMENTS

For at least the last decade, the California Legislature has taken steps to limit the state's collaboration with immigration enforcement activity, most notably through passage of SB 54 (De Leon, Chap. 495, Statutes. 2017) which limited the use of state and local resources for the purposes of immigration enforcement. The Legislature has also enacted bills prohibiting state and local governments from contracting for immigration detention centers, requiring the Attorney General to develop and disseminate guidance for state and local agencies in their interactions with immigration enforcement agents, requiring schools and daycares to restrict federal agents' access to their campuses, among numerous other efforts to respond to the federal government within the ability of the state.

This bill seeks to continue in the tradition of arming the state with the information necessary to develop holistic policies that are responsive to immigration enforcement policies that risk harming Californians. This bill requires that, by July 1, 2027, the Department of Justice (DOJ) establish the Working Group on Civil Rights Accountability. The bill tasks the working group with providing recommendations to the Legislature and the AG to "strengthen oversight, improve data transparency, and protect the civil and constitutional rights of individuals and communities impacted by immigration enforcement." The bill prescribes the makeup of the committee; grants appointment authority to the Governor, Speaker of the Assembly, President pro Tempore of the Senate, and the AG; and provides qualification factors for potential members.

Additionally, the bill tasks the working group with developing a "statewide reporting dashboard to document and categorize alleged constitutional or civil rights violations arising from federal immigration enforcement activities within the state," and requires the DOJ to "establish standards, submission protocols, and data verification procedures for nonprofit organizations authorized to submit reports to the dashboard." The bill seemingly limits use of the dashboard to certain nonprofits that meet specified qualifications.

Finally, the bill exempts the required reports from disclosure pursuant to the California Public Records Act (CPRA).

### **According to the Author**

This bill establishes a Working Group on Civil Rights Accountability within the California Department of Justice to ensure that the experiences of immigrant families impacted by federal immigration enforcement are formally documented and heard. It creates a clear and accessible process for individuals and trusted community organizations to report harm, including excessive force and unlawful detention when rights may have been violated. By collecting and reviewing this information, the state can better understand what is happening on the ground and work to prevent harm. Ultimately, this bill is about protecting families and ensuring that all Californians are treated fairly under the law.

### Arguments in Support

This bill is supported by California Rural Legal Assistance Foundation. In support of the measure they state:

According to the Economic Policy Institute, the current Administration has increased funding exponentially by 14 times to escalate immigration enforcement, in comparison to other U.S. Agencies.<sup>1</sup> For example, in fiscal year 2023, immigration enforcement funding was at \$30.2 billion compared to \$2.2 billion for labor standards enforcement.<sup>2</sup> This means that workers will likely experience immigration enforcement activity on the job long before an inspector comes to evaluate the workplace for labor, wage, or safety violations.

A recent March 2026 policy brief by the Congressional Research Service stated that it was hypothesized "that immigration enforcement programs may have had a chilling effect on employment.....because the programs increased the likelihood that any interaction with local police—even being pulled over for a traffic stop on the way to or from work—could have led to deportation.<sup>3</sup> As we know, these are the exact scenarios where Californians are vulnerable to violations of their civil liberties by immigration enforcement activity.

AB 2662 will collect these stories and categorize reliable data that will better illuminate exactly how federal immigration enforcement actions against Californians have violated their constitutional and civil liberties. The parameters set forth in the bill ensure that data submission by nonprofit organizations meet data integrity, and confidentiality and privacy standards as established by the Department of Justice. We applaud the author for providing direction that the civil rights working group assess and identify any "trends, geographic patterns, systemic concerns" and submit an annual report and recommendations to the Legislature on how "to safeguard constitutional and civil rights within the state."

At a time when the federal government refuses to be transparent about its immigration activity and arbitrarily and capriciously targets Californians, AB 2662's annual report will provide California with a full picture of the extent of the federal government's violations of Californians' civil rights and liberties, while protecting sensitive information. For all of the foregoing reasons, we urge you to support on AB 2662 that will create a centralized system to collect and publish incidents of civil rights violations by immigration enforcement activity.

### Arguments in Opposition

None on file

### FISCAL COMMENTS

According to the Assembly Appropriations Committee, approximately \$8 million or less ongoing General Fund to DOJ, plus \$226,300 one-time and \$217,000 ongoing in IT costs for dashboard development and maintenance. Implementation is contingent on appropriation of funds. DOJ identifies approximately 33 ongoing positions across six divisions beginning fiscal year 2027-28, including the Civil Rights Enforcement Section (CRES) (15 positions) to staff the Bagley-Keene working group and produce the annual report; the Police Practices Section (PPS) (nine positions) to evaluate reported incidents and analyze trends; the Research Services Branch (four positions) for data analytics; the Office of General Counsel for rulemaking and Bagley-Keene advice; the Public Inquiry Unit (three positions) for constituent intake; and the Victim Services Unit (VSU) (two positions) for direct advocacy support to immigrant victims. DOJ reports it cannot absorb

these costs and is continuing to discuss potential cost-reduction amendments with the author's office.

The committee notes that several elements of DOJ's estimate appear to extend beyond what the bill requires. The bill directs the working group to document, categorize, and summarize alleged violations submitted by qualified nonprofits — not to adjudicate individual incidents or provide direct services to victims. PPS's nine positions are premised on case-by-case evaluation of whether reported conduct constituted excessive force or unlawful searches and seizures, and VSU's two positions provide trauma-informed advocacy, crisis intervention, and referrals — neither function is mandated by the bill as drafted. CRES's estimate does not disaggregate attorney workload by function (rulemaking, member advice, dashboard policy, report drafting), making it difficult to assess whether seven ongoing attorney positions remain necessary once initial rulemaking is complete. Additionally, the estimate does not indicate whether DOJ considered leveraging the federal misconduct reporting portal it launched in December 2025 to reduce incremental dashboard and intake costs.

The Legislative Analyst's Office recently warned of General Fund structural deficits of around \$35 billion per year beginning in the 2027-28 fiscal year.

Consistent with the committee rules, this bill is a candidate for the committee's suspense file, regardless of its costs, because it has the primary purpose of creating a working group.

## VOTES

### **ASM JUDICIARY: 9-3-0**

**YES:** Kalra, Bauer-Kahan, Bryan, Connolly, Harabedian, Pacheco, Papan, Stefani, Zbur

**NO:** Macedo, Dixon, Sanchez

### **ASM APPROPRIATIONS: 11-3-1**

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

**NO:** Dixon, Ta, Tangipa

**ABS, ABST OR NV:** Hoover

## UPDATED

VERSION: April 6, 2026

CONSULTANT: Manuela Boucher / JUD. / (916) 319-2334

FN: 0002600