

March 5, 2025

The Honorable James Comer
Chairman, House Committee on Oversight
and Government Reform
Washington, D.C. 20515

The Honorable Gerald E. Connolly
Ranking Member, House Committee on
Oversight and Government Reform
Washington, D.C. 20515

Dear Chairman Comer and Ranking Member Connolly,

We, the 59 undersigned faith organizations and denominations, offer this statement for the record in response to the investigation of Sanctuary Cities. We express our collective concern for the misrepresentation of the values-oriented mission of sanctuary. Our faith communities hold fast to fundamental tenets of justice, the inherent worth of every individual, and acting with compassion. We recognize the Divine expects our work and service to support all our neighbors in their pursuit of safety, prosperity, and peace. At the core of modern sanctuary is the unwavering conviction that immigration status is irrelevant to the sacred mandate to welcome and support those in need. We applaud and stand with jurisdictions across the United States that embody this calling in their treatment of our immigrant neighbors.

For generations, communities of faith around the country have honored their moral duty to those who sojourn by working to provide shelter, protection, and basic resources to people seeking refuge from persecution. These congregations trace their work through a lineage of religious and secular institutions in the United States that have long offered safe harbor to populations at risk of violence, including people seeking refuge from horrors including slavery, the Holocaust, and mob violence targeting civil rights workers.¹

This calling to ensure people are and feel safe where they work and live—regardless of their race, creed, or immigration status—reflects a religious consensus to act with compassion. The Torah calls us to love the foreigner as ourselves. The Quran reminds us to use our wealth and resources to support those in need, including migrants and immigrants. Similarly, Christian teaching urges generosity and concern for all, especially those deemed unwanted by society, as an act of service to the Lord. In this spirit, our spaces have served as sanctuary time and time again.

In the 1980s, over 500 churches and synagogues responded to the federal government's failure to extend asylum to Salvadorans and Guatemalans facing civil wars by organizing their houses of worship to provide food, shelter, and legal support to people fleeing atrocities in Central America. As the Sanctuary Movement grew, its leaders advocated for cities to pass local ordinances to promote immigrants' safety and freedom beyond the walls of houses of worship, protecting immigrant communities from surveillance, detention, and deportation.²

¹ Colbern, Allan, Melanie Amoroso-Pohl, and Courtney Gutiérrez. Contextualizing Sanctuary Policy Development in the United States: Conceptual and Constitutional Underpinnings, 1979 to 2018

https://ir.lawnet.fordham.edu/cgi/viewcontent.cgi?params=/context/ulj/article/2760/&path_info=Colbern_Final.pdf

² California Immigration Museum: The Sanctuary Movement <https://www.calmigration.org/sanctuary>

As religious groups affirm the importance of providing sanctuary to immigrants, cities and states are afforded this discretion as well. We recognize that states and cities have varying capacities and willingness to do so, which is why diverse policies are central to the evolution of sanctuary. One aspect of sanctuary is clear: jurisdictions have the right to operate in solidarity with their immigrant communities.

A cornerstone of the U.S. Constitution is the separation of state and federal powers. Sanctuary policies honor state and local government's autonomy in how they engage with federal immigration enforcement. This principle aligns with a norm established by the 10th Amendment, which asserts that the federal government cannot compel states or their political divisions to act as federal implementers.³ Any support of policies to restrict sanctuary is a slippery slope toward other infringements on state and local rights. Just as localities may elect to voluntarily cooperate with federal law enforcement via 287(g) programs and similar agreements, jurisdictions may also choose not to act as extensions of federal immigration enforcement. It is entirely lawful for jurisdictions to disengage from federal immigration enforcement through various policies.

Sanctuary is not at the expense of public safety.⁴ While there is no legal definition for a sanctuary policy, sanctuaries generally limit the engagement of local entities in civil immigration enforcement. Sanctuary jurisdiction is not about shielding or harboring undocumented immigrants from prosecution for criminal activity or deportation. The reality is sanctuary correlates to safer conditions.

An entire community's public well-being is often at the heart of sanctuary. Research published by the National Academy of Sciences indicated that between 2010 and 2015, sanctuary policies did not prevent the "deportations of people with violent convictions."⁵ Additionally, a study conducted by the Center for American Progress in 2017 revealed that there were, on average, 35.5 fewer crimes committed per 10,000 people in sanctuary counties compared to non-sanctuary counties.⁶ Other research by Cambridge University found that a close relationship with local law enforcement and Immigration and Customs Enforcement (ICE) results in fewer undocumented immigrants reporting crimes, ultimately worsening public safety for all.⁷

³ The 10th Amendment affirms that the federal government "may neither issue directives requiring the States to address particular problems, nor command the States' officers, or those of their political subdivisions, to administer or enforce a federal regulatory program." "Sanctuary Policies: An Overview." American Immigration Council, October 8, 2024, <https://www.americanimmigrationcouncil.org/research/sanctuary-policies-overview>.

⁴ Huasman, David K., Sanctuary policies reduce deportations without increasing crime, *Proceedings of the National Academy of Sciences*, October 19, 2020, <https://www.pnas.org/doi/10.1073/pnas.2014673117>.

⁵ "Sanctuary Policies: An Overview." American Immigration Council, October 8, 2024, <https://www.americanimmigrationcouncil.org/research/sanctuary-policies-overview>.

⁶ Wong, Tom K., "The Effects of Sanctuary Policies on Crime and the Economy." Center for American Progress, February 12, 2025, <https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/>.

⁷ Wong, Tom K., S. Deborah Kang, Carolina Valdivia, Josefina Espino, Michelle Gonzalez, and Elia Peralta. "How Interior Immigration Enforcement Affects Trust in Law Enforcement." *Perspectives on Politics* 19, no. 2 (2021): 357–70. <https://doi.org/10.1017/S1537592719003943>.

Affronts on sanctuaries by President Trump are not new. During his first term, President Trump issued the *Enhancing Public Safety in the Interior of the United States* executive order to bar funding to sanctuary jurisdictions. The action faced subsequent litigation, with several courts finding the administration overreached its authority, largely because Congress holds the power of the purse.

Despite 10th Amendment protections for sanctuary jurisdictions, the House has used the guise of spending power to justify legislation that blocks funding to sanctuary localities, with the chamber passing it in 2015, 2017, and 2024. Congress is again debating the No Bailout for Sanctuary Cities bill (H.R. 32), which would block critical federal funding for localities.

On the first day of the second Trump administration, the president signed the executive order *Protecting the American People Against Invasion*, directing the Department of Justice (DOJ) and Department of Homeland Security (DHS) to take action to force states and localities to cooperate with immigration enforcement. We've since seen several departments roll out accompanying memos. Readily, a Sanctuary Cities Enforcement Working Group was created within the DOJ.⁸ On February 5th, newly sworn-in Attorney General Pam Bondi followed suit by issuing a directive pausing funding to believed sanctuary jurisdictions.⁹

Threats against sanctuary cities were largely unsuccessful during President Trump's first term, and it's remiss that these ineffective and universally harmful policies continue in the second Trump administration and the 119th Congress. The undefined perception of sanctuary and the incomprehensive interpretation of potentially terminated funds is dangerously broad. It will ultimately harm citizens alongside immigrants of varying statuses. Such actions place cities and states in a difficult position, risking vital funding for public services such as education, healthcare infrastructure, and first responder resources. Additionally, these jurisdictions could lose the trust of their own communities and put themselves at risk of expensive lawsuits by allowing specific partnerships between local law enforcement and ICE and DHS, as courts have ruled that certain arrangements can violate the 4th Amendment.¹⁰

States, local governments, and other facilities and authorities rely on taxpayer dollars to administer services—such as child care, food assistance, and housing support—that affect the everyday lives of people and their communities. Although levels vary by state, federal funds make up anywhere from 18 to 50 percent of state budgets.¹¹ States are then responsible for funds

⁸ “DOJ Creates New.” DOJ Creates New “Sanctuary Cities Enforcement Working Group,” January 21, 2025, <https://immpolicytracking.org/policies/reported-doj-creates-new-office-of-sanctuary-cities-enforcement/#/tab-policy-documents>.

⁹ “Sanctuary Jurisdictions,” DocumentCloud, February 5, 2025, <https://www.documentcloud.org/documents/25514015-sanctuary-jurisdictions/>.

¹⁰ “New Class Action Settlement Requires Ice to Stop Rampant Constitutional Violations for People Subject to Ice Detainers,” National Immigrant Justice Center, February 10, 2025, <https://immigrantjustice.org/staff/blog/new-class-action-settlement-requires-ice-stop-rampant-constitutional-violations-people>.

¹¹ “Total State Expenditures - Proportion from Federal Funds, Estimated, FY 2024,” Coalition on Human Needs, January 2025,

administered at the local level. Federal cuts shift the funding of these core services onto states whose budgets are already strained.

Some federally funded programs, such as the National School Lunch Program and Department of Education grants, are not permitted to deny services to children of any status. Others provide support to people regardless of their immigration status, meaning citizens would also be impacted. Collaboration of local police with ICE and DHS has negative outcomes for families and children, such as unstable housing, students missing school, poor child well-being, low birth weight, and less preventative and prenatal medical care.

We stand firmly in our commitment to welcoming newcomers and protecting the migrant communities we belong to, love, and serve—a deep expression of our religious identity and values. Our defense of sanctuary policies is a testament to our unwavering dedication to the sanctity of refuge. We urge Congress to respect our traditions’ longstanding commitment to upholding immigrants’ safety and to reject H.R. 32 - the “No Bailout for Sanctuary Cities Act” and any other measures that would undermine our communities’ capacity to welcome and protect those who sojourn. We hold that states and localities have the same right to exercise discretion in their involvement with federal immigration enforcement.

Sincerely,

Alliance of Baptists

American Friends Service Committee

Berrien Immigrant Solidarity Network

Baltimore-Washington Conference, the United Methodist Church Advocacy and Action Network

Central Pacific Conference of the United Church of Christ

Christian Council of Delmarva

Clinton United Methodist Church

Colectivo/Cathedral of Hope, United Church of Christ

Dorothy Day Catholic Worker, Washington DC

Dumbarton United Methodist Church

Dutchess Interfaith Council

Echo Park Immigration Center

Epworth United Methodist Church

Evangelical Lutheran Church in America

<https://www.chn.org/wp-content/uploads/2025/01/NASBO-State-Expenditure-Report-2024-Fed-Funds-pdf>

Faith in Public Life Action
First Congregational Church of Palo Alto
First Congregational United Church of Christ
Franciscan Action Network
Franciscan Justice Circle, Mid-Hudson Valley, NY
Friends Committee on National Legislation
Grace United Methodist Church
Immigration Law & Justice Network
Interfaith Welcome Coalition - Texas
Interfaith Welcoming Coalition - Vermont
JPIC Office of the Sisters of Christian Charity
Justice and Advocacy Ministries at Disciples Home Missions
Kino Border Initiative
Kirkwood United Church of Christ
Latin America Working Group
Latino Initiative on Restorative Justice
Leadership Team of the Felician Sisters of North America
Main Street Congregational United Church of Christ
Maryknoll Office for Global Concerns
Mayflower Congregational United Church of Christ
Mennonite Central Committee U.S.
Missionary Sisters of the Immaculate Conception
Mountain View United Women in Faith unit
Native American International Caucus
NETWORK Lobby for Catholic Social Justice
Northeast Jurisdiction Native American Ministries Committee, United Methodist Church
Pax Christi, Hudson Valley, NY
Peninsula Delaware Committee on Native American Ministries, United Methodist Church
Pilgrim United Church of Christ

Salem Baltimore United Methodist Church
Sisters of Mercy of the Americas - Justice Team
Sisters of Saint Francis Rochester Minnesota
Sisters of St. Francis of Penance and Christian Charity, Holy Name Province
Sisters of St. Francis of the Neumann Communities
St. Lukes United Methodist Church/Baltimore-Washington Conference
Task Force on United Methodist Immigration Ministries of Ohio
T'ruah: The Rabbinic Call for Human Rights
Union for Reform Judaism
Unitarian Universalist Association
Unitarian Universalists for Social Justice
United Church of Christ
United Church of Christ Clergy
University United Methodist Church - College Park
Washington Grove United Methodist Church
Wesley Theological Seminary

cc: Full House Committee on Oversight and Government Reform