

# FREDERICK COUNTY IMMIGRATION ENFORCEMENT

Fighting Crime or Just Fighting Immigrants?



A report by CASA de Maryland, Inc.

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DE MARYLAND™

May 6, 2008





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## Executive Summary

In February 2008, the Frederick County Sheriff's Office finalized a formal agreement with U.S. Immigrations and Customs Enforcement (ICE), and began training twenty-six Frederick County deputies in immigration enforcement. The agreement is known as a 287(g) agreement in reference to the section authorizing cooperation between local law enforcement agencies and federal immigration in the Immigration and Nationality Act. Frederick County also began participating in ICE's Criminal Alien Program. This is the first 287(g) agreement in Maryland. CASA de Maryland, the largest immigrant service and advocacy organization in Maryland conducted an empirical and comparative analysis of current and predicted costs, incarceration rates and community impact, including crime fighting capacity. The study reveals that the Frederick County's planned immigration enforcement program will result in negative consequences and cause unprecedented harm for residents of Frederick County and for Maryland.

The report's key findings:

- Frederick County is investing more per person and more per foreign-born person than any of the similar jurisdictions that have implemented such programs. In fact, Frederick County is investing about two times as much as the next closest jurisdiction per person and over three times as much as the next closest jurisdiction per foreign-born person.
- Frederick County has trained 14% of its force on immigration enforcement, compared to 3% and 1% of similar jurisdictions in Virginia.
- Frederick County's immigration enforcement program will have a negative impact on public safety by discouraging trust and cooperation with law enforcement.
- The estimated cost of immigration enforcement, in contrast to the Sheriff's publicly stated estimate of "zero", is \$3,217,220 per year, not including the cost of liability.
- Frederick County has an alarmingly high incarceration rate for Latinos. It has increased almost 400% in the last five years and is more than double the population of Latinos in the county.
- The Frederick County Sheriff's Office already likely engages in racial profiling of Latinos, and obscures the problem by recording most Latinos as "white" during police stops. The program will result in an increase in racial profiling, which is harmful to all Latinos, all African-Americans and all foreign-born persons.

## **Key Recommendations**

- Sheriff Jenkins and the Frederick County Sheriff's Office halt its immigration enforcement program by terminating the 287(g) agreement.
- Investigate racial profiling by the Frederick County Sheriff's Office
- Investigate the rise of Latino inmates in the Frederick County Adult Detention Center.
- Implement a community, school and social service response plan in the event of family separation caused by detention or deportation.

## Introduction

Frederick County, established in the 1720's, has long been a county of immigrants.<sup>1</sup> In the early 1730's, the state of Maryland began offering inducements to foreign-born settlers. Germans arrived from Pennsylvania, and the English and Scotch migrated from Virginia and Southern Maryland.<sup>2</sup> One of the first settlements in Frederick County was the village of Monocacy, established by German immigrants in as early as 1729. The County's first newspaper, *The Maryland Chronicle or the Universal Advertiser*, established by Mattias Bartgis in 1786, was printed in both English and German.<sup>3</sup> The Scots Irish immigrants, also known as the Ulster Scots, migrated towards the highlands of Frederick County Maryland in the mid 1800's.

In recent times, a booming Frederick County economy has again attracted a new wave of immigrants. In 2007, for example, Frederick County had the third highest number of new jobs created in Maryland and the second highest labor force participation in the state.<sup>4</sup> The County's labor force increased six percent from 2002 to 2006, and the 2006 average unemployment rate was three percent, a rate significantly lower than both Maryland's and the nation's.<sup>5</sup> Frederick County is the largest agricultural county in Maryland, accounting for 10% of Maryland's total farmland.<sup>6</sup> The county is also Maryland's largest dairy producer, providing one-third of the state's milk production.<sup>7</sup> Dairy farmers sell more than \$50 million of dairy products each year, making Frederick County one of the top 75 counties in the country for the production of dairy products.<sup>8</sup> Immigrants, including newly arrived and undocumented immigrants, have been drawn by and have contributed significantly to Frederick County's boom.

According to local businessmen and businesswomen, much of this growth is attributed to the influx of immigrants, including employees, consumers and business owners. Jorge Ribas, president and CEO of the Mid-Atlantic Hispanic Chamber of Commerce, says that many Latinos are choosing Frederick to set up shop.<sup>9</sup> Local business owners have seen first-hand the contributions of Hispanic immigrants and have made significant effort to, "build relationships with [the Hispanic community] as potential vendors."<sup>10</sup> Hispanic restaurants, markets, grocery stores, and shops line West Patrick Street in Frederick. "Next to Jenny Craig is Santa Rosa, serving Mexican and Salvadoran food...Across from the Home Depot is a grocery store owned by Peruvians, a pizza place run by Salvadorans and Café Latino," owned by an El Salvadorian immigrant who has lived in the United States for 28 years.<sup>11</sup> The immigrant community also contributes to Frederick's economy as consumers, renters, and property owners. And, according to a recent article, behind all of the businesses in Frederick are immigrants, "cleaning dishes, cooking food, fixing things. You open any door and you will see..."<sup>12</sup> Finally, immigrants contribute significantly to Frederick's important agricultural industry.. The U.S. Department of Agriculture's Economic Research Service estimates that immigrants without documents make up more than half of the farm-worker labor market, though farm-worker and other labor unions estimate the figure is closer to 70 percent.<sup>13</sup>

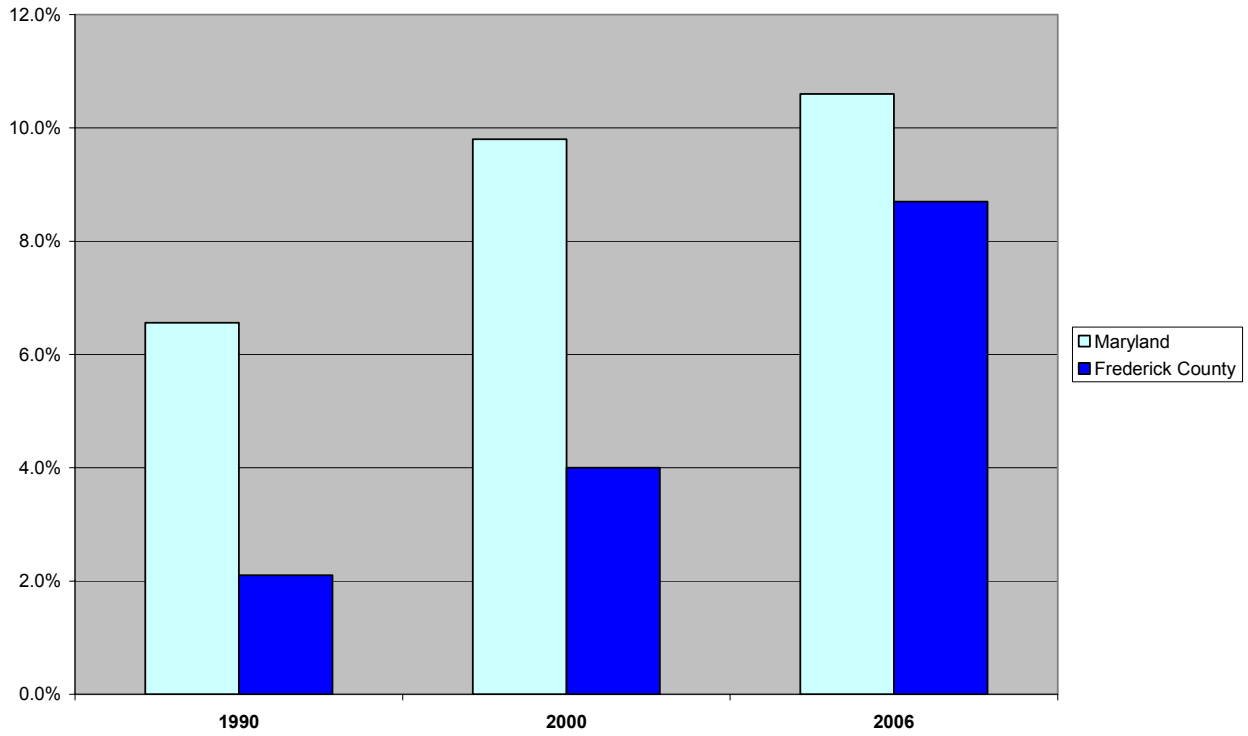
When Sheriff James W. Hagy decided to retire after twelve years as Sheriff<sup>14</sup>, a robust campaign for his successor ensued. Sheriff Charles “Chuck” Jenkins, a Republican and law enforcement official in Thurmont, campaigned for election largely on a platform of immigration enforcement.<sup>15</sup> During 2007, Sheriff Jenkins made many public statements that linked crime in Frederick with immigrants, and also signaled that he was meeting with federal officials in order to participate in federal immigration enforcement cooperation programs. He stated that if immigrants came to Frederick from Virginia he would “shoot ‘em right back.”<sup>16</sup> He made virtually no effort to reach out to Frederick’s significant and growing immigrant population.

As Frederick County initiates Maryland’s first formal immigration enforcement program, it risks driving away the significant immigrant community and their economic, cultural and other contributions. One business owner has noticed that his customers are recently not spending as much money, and believes they are instead sending it back to their home countries in case they get deported. “I think small businesses are going to suffer,” he says.<sup>17</sup> Timothy Slane, Sr. is worried that his landscape business will not survive without immigrant workers. There are not enough people in Frederick County, he states, that are willing to do the seasonal, manual labor at an hourly rate he can afford to pay them and still keep his business profitable.<sup>18</sup>

## **Immigrant Demographics in Frederick County**

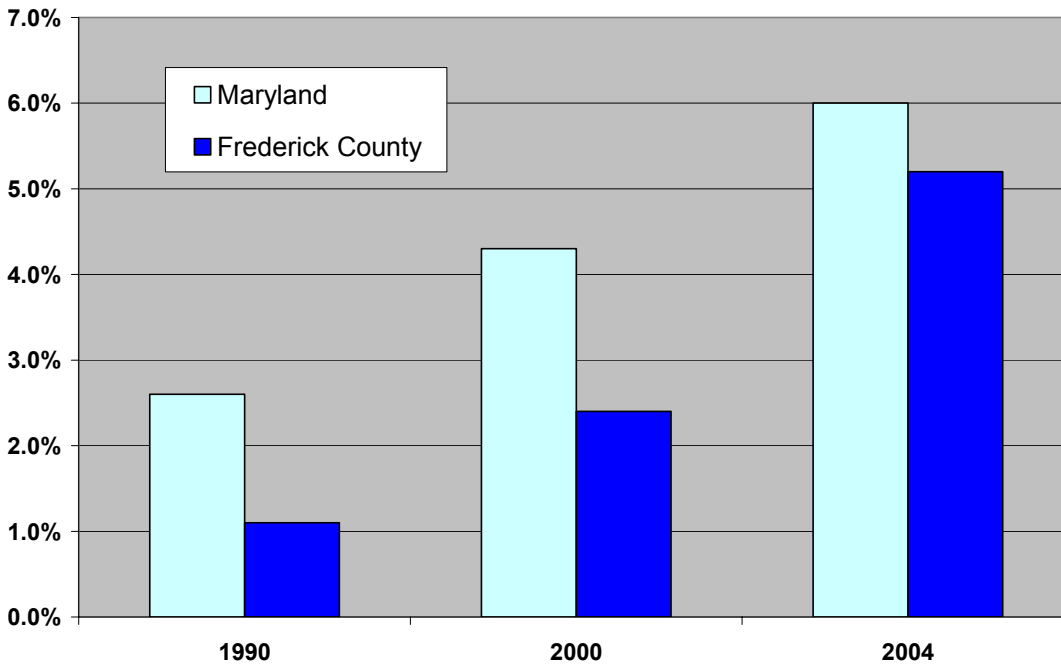
According to the Census Bureau’s 2006 population estimate, Frederick County is 86.1% white and 18.2% minority.<sup>19</sup> More than eight percent of Frederick’s population is foreign-born, and 5.6% speak a language other than English at home. Over the past few years, the County has experienced one of the largest population increases in Maryland, and many of the new community members are foreign-born immigrants. In the last sixteen years (1990 to 2006), the percentage of foreign-born persons has quadrupled from 2% to 8%. In the past 14 years, the percentage of Latinos in Frederick County has jumped from about one percent to five percent, as shown by the following charts:

### Percentage of Foreign Born Persons



Sources: US Census Bureau

### Percentage of Persons of Hispanic or Latino Origin



Sources: US Census Bureau

### Most recent population estimates

	Population (2006)	Foreign born persons (2000)	Persons of Hispanic origin (2004)
Maryland	5,615,727	550,341 (9.8%)	336,944 (6%)
Frederick County	222,938	8,918 (4%)	11,593 (5.2%)

Source: US Census<sup>20</sup>

## Immigration Enforcement by Local Sheriffs and Police

The federal government has traditionally acted as the primary enforcement agency of immigration laws, and for decades it was accepted law and practice that state and local police did not enforce civil immigration law.

The U.S. Constitution gives the federal government the duty of setting and enforcing immigration policy. In addition, most immigration violations are civil violations, not criminal (for example, failure to attend a removal hearing results in the entrance of a civil detainer warrant). Local law enforcement generally has little involvement with the enforcement of any civil laws.

In 1996, Congress granted limited circumstances under which local law enforcement could engage in the enforcement of immigration law. The Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) created a mechanism where the U.S. Attorney General could delegate immigration law enforcement duties to local law enforcement, provided the officers underwent adequate training and entered into a formal agreement with the U.S. Department of Justice. This mechanism is now contained in section 287(g) of the Immigration and Nationality Act (8 U.S.C. §1357(g)) and is the origin of the more commonly used name - 287(g) agreements.<sup>21</sup>

## Frederick County's Immigration Enforcement Programs

On February 4, 2008, twenty-six Frederick County Sheriff's Office personnel began a four-week immigration enforcement training, with participation by 16 correctional officers and 10 sworn deputies.<sup>22</sup> On February 5, 2008 Frederick County Sheriff Charles "Chuck" Jenkins signed a Memorandum of Agreement with U.S. Immigration and Customs Enforcement (ICE) (part of the U.S. Department of Homeland Security).

According to remarks made at a press conference held by the Sheriff, Frederick County also began participating in ICE's Criminal Alien Program (CAP). The CAP, according to the ICE website, "focuses on identifying criminal aliens who are incarcerated within federal, state and local facilities, thereby ensuring that they are not released into the community by securing a final order of removal prior to the termination of their sentence".<sup>23</sup>

Prior to signing the agreement, Sheriff Jenkins failed to hold a single meeting about immigration enforcement with any of the following groups, all of whom will be affected by increased immigration enforcement in Frederick County:

- Immigrants, both legal and undocumented.
- Legal residents and U.S. citizens who may be asked for immigration papers because they look, sound or are perceived to be foreign-born.
- Employers who may lose long-time employees due to deportations.
- Landlords and other small business people who may lose business and revenue due to deportations.
- Churches, community groups, and government agencies who will be called upon and forced to deal with the aftermath of increased immigration enforcement, due to families being separated, family income decreasing due to detentions and removals, an increased need for emergency child care and foster care, and many other problems that have faced other communities in the wake of increased immigration enforcement.

This report will outline the rationale behind Frederick County's 287(g) agreement and other immigration enforcement plans and will dispute the agreement as misguided policy that will jeopardize community policing, undermine public safety, and most likely result in racial profiling. Finally, the report makes a series of recommendations to elected officials and the community of Frederick County.

## **Frederick County's Investment in Immigration Enforcement is High Compared to Other Jurisdictions**

Frederick County is training a disproportionately large number of officers to enforce federal immigration laws compared to other similar jurisdictions on all three measures we examined:

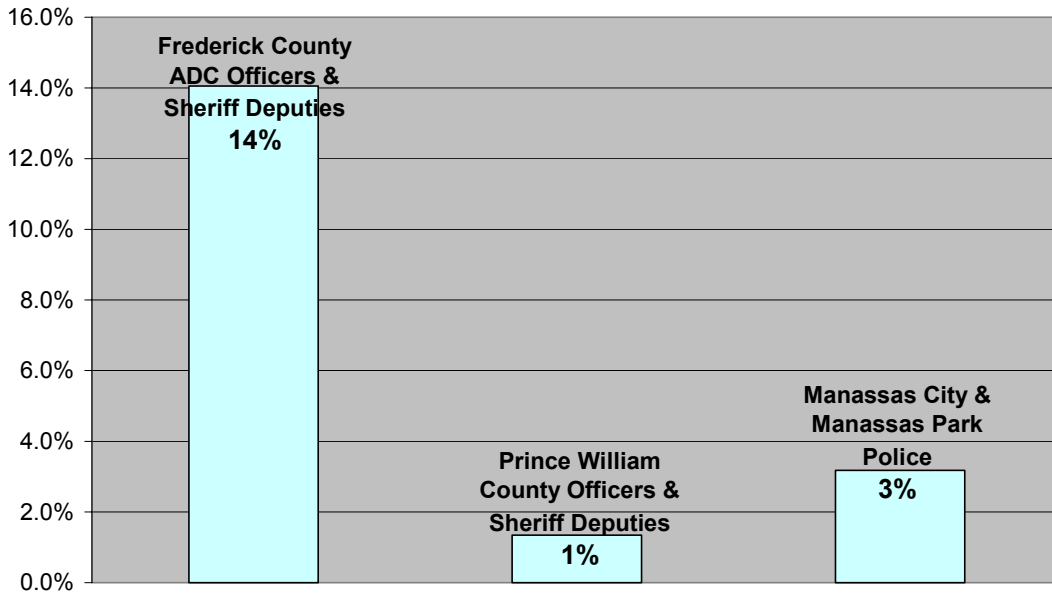
- size of the police force
- size of the general population
- size of the foreign-born population.

To build a universe of comparative jurisdictions, we searched ICE press releases to determine which localities had implemented 287(g) agreements and the numbers of officers that have received ICE training.

We first analyzed the number of officers trained under 287(g) agreements and compared the numbers of officers trained with the total size of the police or sheriff's force. We examined the nearby jurisdictions of Prince William County and Manassas because data on the number of officers trained and the size of the total police force was easily obtained.

We found that 14% of Frederick County officers have received ICE training, more than 4 times as many as Manassas (3%) and 14 times as much as Prince William County, Virginia (1%). The following chart shows the results of our analysis:

**Percentage of Force Trained in Immigration Enforcement**

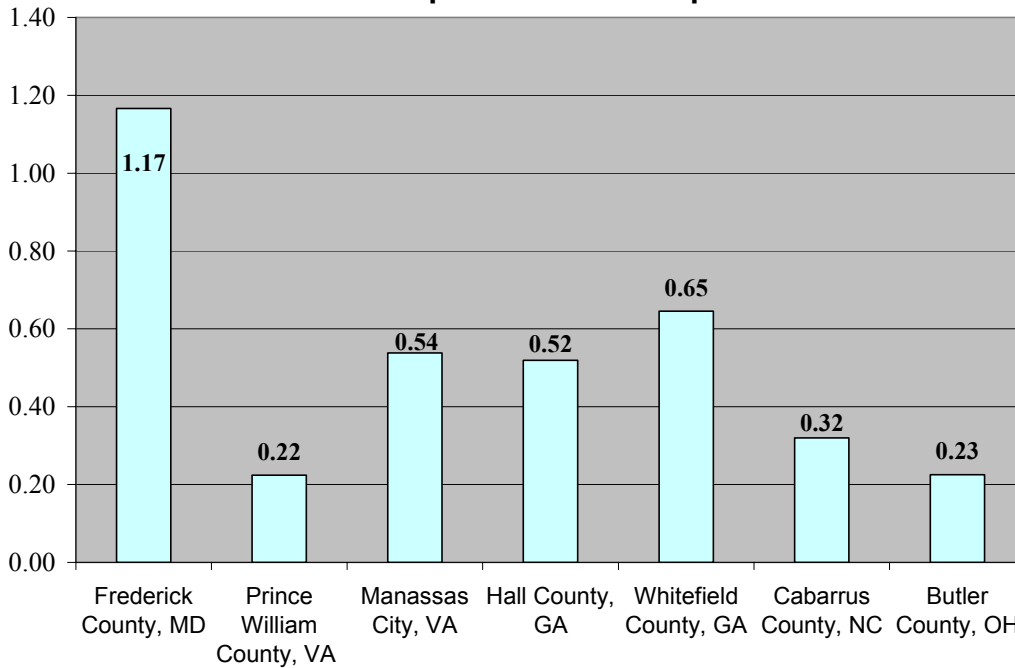


**Sources:**

Operating and Capital Budget of Frederick County Government; FY 2008, City of Manassas, VA FY 2008 Adopted Operating Budget; Manassas Park Police 2008 Organizational Chart; Prince William County Police Department Telephone Interview with 1st Sgt. J. Hollabaugh, Deputy Sutton, Prince William County Sheriff's Office (March 21, 2008). Full data is available in the Appendices.

We next examined the number of officers trained per 10,000 people in the general population. Because the general population data was easier to obtain than size of force data, we were able to compare seven similar localities (six counties and one city). Frederick County has trained 1.17 officers per 10,000 people in the general population, almost twice as many compared to the next highest jurisdiction, Whitefield County, Georgia. Frederick County's ratio of officers trained in immigration enforcement to the general population is more than three times the average of the other jurisdictions.

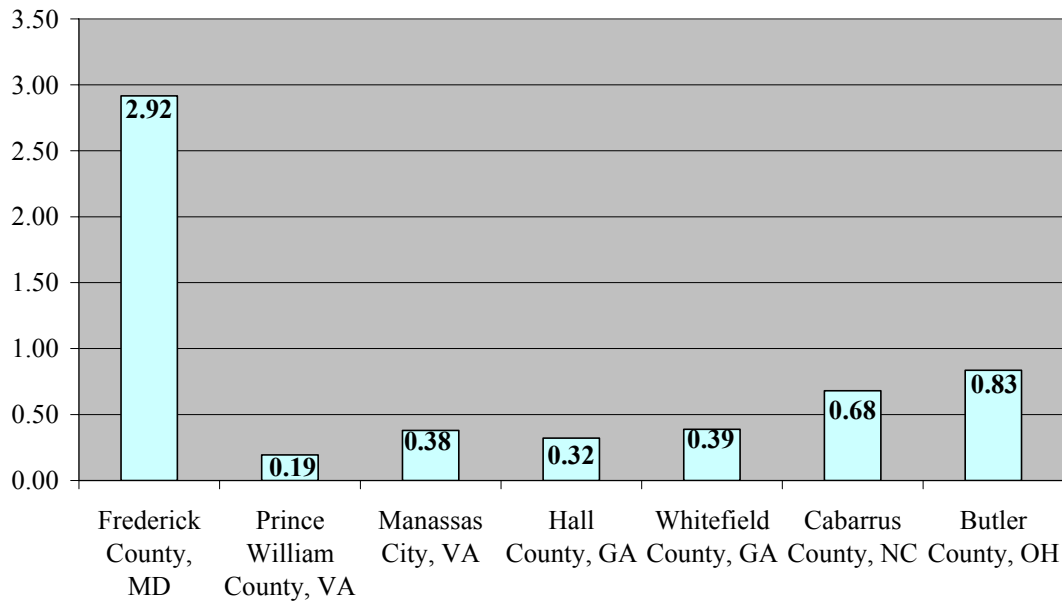
### Officers Trained in Immigration Enforcement Per 10,000 People in General Population



Sources: US Census Bureau: State and Country Quick Facts & US Immigrations and Customs Enforcement Press Releases. Population Data is from 2003 (city) & 2006 (counties).

Finally, we examined Frederick County's investment in immigration enforcement compared to the foreign-born population. Here, Frederick County has trained almost 3 officers per 1,000 foreign born persons. Frederick County is investing more than three times as much as the next closest jurisdiction and six times more than the average of the six jurisdictions we analyzed.

## Officers Trained in Immigration Enforcement Per 1,000 Foreign-Born Persons



Sources: US Census Bureau: State and Country Quick Facts & US Immigrations and Customs Enforcement. Population Data is from 2000 (most recent available).

### ***Putting it in Perspective***

To put Frederick County's expenditure on and investment in immigration enforcement in perspective, consider. The Frederick County Sheriff's Victims Services Unit consists of trained professionals to provide emergency services, crisis intervention, follow-up contact, referrals and support<sup>24</sup> providing services to victims of crime, such as victims of childhood sexual assault, grieving family members of murder victims, and domestic violence victims. The unit consists of just two people.<sup>25</sup> In contrast, the Sheriff has put twenty six people on the beat of immigration enforcement.

### **Crime Fighting as a Subterfuge to Deport Immigrants**

The Sheriff has stated publicly that his immigration enforcement program is a crime-fighting program by reducing both gangs and terrorists.

The Sheriff has stated that his immigration enforcement program will help curb "street gang" activity. But according to the University of Maryland's Public Safety Training and Technical Assistance Program,<sup>26</sup> the majority of gangs in Frederick County are local neighborhood gangs made up of predominantly Caucasian high school students. Other gangs, such as the Bloods (with just "30+" members), Crips (40+ members) also exist in Frederick, but with little evidence of their effects. There are eight validated members of

MS-13, a Latino gang and 16 validated members of the 18<sup>th</sup> Street Gang, an MS-13 rival.<sup>27</sup> There is simply no evidence to suggest that undocumented immigrants comprise the majority of gang-members in Frederick County.

In other localities, immigration enforcement programs have not resulted in the removal and deportation of “dangerous criminal aliens”, “street gangs”, felons or terrorists, but have instead resulted in mass deportations of people suspected of, but not convicted of misdemeanors, such as driving without a license and simple assault.

For example, Irving, Texas (part of the Dallas metropolitan area) initiated ICE’s Criminal Alien Program, which is the milder half of the Frederick County’s immigration enforcement plan. After just six months of implementation, a Dallas Morning News analysis showed that most people detained under the program were detained due to misdemeanors. Innocent until proven guilty is a bedrock foundation of American law. Families were torn apart and the school system experienced significant disruptions as deportations jumped to more than 300 per month.<sup>28</sup>

## **Effect on Community Policing**

Police agencies depend on the cooperation of all immigrants, whether documented or undocumented, in solving crimes and ensuring order. If immigrants fear investigation and deportation, many with critical information will refuse to speak to the police, “even when heinous crimes are committed against them or their families.”<sup>29</sup> And because many legal residents and U.S. citizens have undocumented family members, local police enforcement will injure a much larger part of the community.

Law enforcement agencies around the country have realized the damaging effects of community fear and distrust and have chosen to turn to community policing. The U.S. Department of Justice’s Office of Community Policing defines community policing as “a policing philosophy that promotes and supports organizational strategies to address the causes and reduce the fear of crime and social disorder through problem-solving tactics and police-community partnerships.”<sup>30</sup>

At least 50 jurisdictions around the country have realized the damaging effects of community fear and distrust and have either turned to community policing, or enacted laws, resolutions, or policies that in some way limit the enforcement of immigration laws by state and local authority.<sup>31</sup> Several localities that originally expressed interest in the 287(g) program, including the state police of Virginia, eventually abandoned it because of concerns about racial profiling and the effect on the community. The chief of the Fairfax County police pointed out that “We’re not advocating, supporting or facilitating illegal immigration.” But, he added, “Our job is to protect people. And I’m concerned that people who are victims of a crime, whether citizens or not, are not calling us because they’re afraid we’re going to check [legal] status only.”<sup>32</sup>

A Houston police lawyer says that state and local police agencies “should continue cooperation with the federal government” in instances where federal immigration authorities need local assistance in picking up a specific suspect, where there is a criminal warrant out for a suspect’s arrest, or a suspect has been ordered deported but has failed to leave.<sup>33</sup> But local enforcement of immigration law, adds Ferrell, “would be imprudent...[would make] the job of the state and local police more difficult... and would hinder crime fighting at the local level.”<sup>34</sup> The Houston official also acknowledges that state and local police enforcement of immigration laws will have “a chilling effects in immigrant communities and could limit cooperation with police.”<sup>35</sup>

Law enforcement relies on the cooperation of residents to perform their duties. When those same officials are authorized to enforce immigration law, immigrant residents and residents who may be mistaken for immigrants will fear communicating or interacting with law enforcement, ultimately undermining public safety, health, and the welfare of all.

### **Real Consequences in Virginia**

Laura, an undocumented immigrant living in Virginia, and a male acquaintance accompanied an employer to a distant job site and upon arrival, the male worker was sent away, and the employer took Laura to a remote part of the site and raped her. It was only when Laura ran into a community center volunteer, weeks later, that she was finally able to share her story. While the volunteer urged Laura to file a police report, it took weeks of active support and reassurances, including accompanying her to the police station, before she filed a report. Because Laura had waited to report the crime, there was no longer any physical evidence and no way to locate potential witness. Laura admitted that she had not immediately reported the rape because she was afraid the police would ask about her immigration status and would have her deported.<sup>36</sup>

Maria’s boss at her worksite pressured her repeatedly to have sex with him. She always refused but was frightened by his persistence. Maria told her boss’s supervisor, but he did nothing to help. Soon the harassment escalated into stalking until one day her boss masturbated in front of her. Maria never told the police because she was afraid they would ask about her immigration status. While Maria no longer works with her old boss, he is still employed by the company and continues to supervise other young women.<sup>37</sup>

### **Frederick’s Agreement Will Not Cost “Nothing”**

In his press conference announcing the new immigration enforcement programs in Frederick County on February 4, 2008, Sheriff Jenkins said that “the cost of this training to the Frederick County and to its taxpayers will be nothing.”<sup>38</sup> But other localities operating under 287(g) have experienced significant costs, and the Frederick County agreement itself lists various costs and expenditures. Post-training costs to Frederick County are significant; we estimate \$3.2 million, as explained below.

The agreement between Frederick County and ICE explains the expenditures<sup>39</sup> that the County must make for this program. The agreement states that Frederick County will carry out most parts of the agreement at its own expense, including:

- salaries and benefits, including overtime
- local transportation
- official issue material
- incidents giving rise to liability
- property or personal expenses of officers incurred by reason of death, injury or incidents
- maintaining an ICE office in any and every facility
- tracking and maintaining accurate statistical data<sup>40</sup>

**Estimated Annual Costs for Frederick County**

Training	\$161,000
Staffing	\$2,091,913
Increased foster care	\$107,921
Detention	\$856,386
<b>Total</b>	<b>= \$3,217,220 per year</b>

The costs were estimated in the following ways.

Training Costs

In determining the training costs, we divided the average salary of a full time equivalent (FTE) employee of an Operations Officer and an Adult Detention Center Officer<sup>41</sup> by the number of weeks in a year and multiplied this number by four weeks of training and the number (26) of officers trained.<sup>42</sup>

Staff Costs

To determine staff costs, we multiplied the Average Salary of a Full Time Equivalent (FTE) employee in the Operations Division by the number of Operations Officers trained (10). Next the Average Salary of an FTE in the Adult Detention Center (ADC) was multiplied by the number of ADC officers trained (16). Lastly, these two numbers were then added together to calculate the staff costs<sup>43</sup>.

Foster Care Costs

The estimated increased foster care costs in Frederick County was calculated by multiplying an Arkansas estimate for increased foster care costs<sup>44</sup> by the population of Frederick County<sup>45</sup> and then divided by the population of Arkansas.<sup>46</sup>

Detention Costs

This cost was calculated by multiplying the Adult Detention Center in Prince William’s County total estimated costs of 287(g)<sup>47</sup> by the population of Frederick County’ and dividing this number by the population of Prince William County.

### ***Prince William County, Virginia's Estimated Cost Was \$6.4 million***

Prince William County in Virginia entered into a 287(g) agreement<sup>48</sup> with ICE and additionally passed a local ordinance mandating that local police inquire into the citizenship and immigration status of detained persons if there is probable cause to believe such person is in violation of federal immigration law, whether or not an arrest happens.<sup>49,50</sup> According to county and published reports, the cost is expected to be \$6.4 million per year with a five year estimate of \$25.9 million.<sup>51</sup> As this report was going to press, Prince William County changed its policy to inquire into immigration status only after arrest. This change plus a rejection of the police chief's suggestion to install cameras in all law enforcement vehicles, a rejection of \$1.2 in police, foster care and protective services for the children of those deported, brought the approved cost down to \$2.6 million.<sup>52</sup>

### ***Arkansas Estimate was \$7.9 million<sup>53</sup> per year***

In Arkansas House Bill 2946 would allow local law enforcement of civil immigration laws. The Mexican-American Legal Defense and Education Fund (MALDEF) estimated the costs to Arkansas to be \$7,863,425 per year. Costs considered included the following direct and indirect costs:<sup>54</sup>

- Cost of training 21 officers
- Increased incarceration costs<sup>55</sup>
- Increased transportation costs for transporting those detained
- Increased foster care costs
- A local police education campaign
- Litigation and legal liability
- Driving up wages and prices

### ***Determining Legal Presence is Extremely Difficult***

By entering into a 287(g) agreement, the Frederick County Sheriff's Office is adding a new professional specialty: determining who is and is not legally present in the country. In other jurisdictions, the complexity of immigration laws has led to wrongful detentions that have resulted in significant liability for local law enforcement.<sup>56</sup>

Frederick County Sheriff's Office personnel will not be able to determine immigration status without extensive knowledge of civil and criminal immigration law. Local officers are trained to detect criminal behavior and lack the specialized knowledge to determine an immigrant's status. Without knowledge of a suspect's visa history (including the possibility of mis-processed or lost papers by the former Immigration and Naturalization Service, or by the current U.S. Citizenship and Immigration Service) or the existence of a suspect's valid immigration appeal rights, it is difficult to properly address immigration violations.<sup>57</sup> For example, many immigrants from Central American countries qualify for Temporary Protected Status (TPS), but because it is nominally temporary, it must be

renewed at periodic intervals and the TPS renewals are nearly always processed with a large backlog. Maryland is an historic destination for refugees, asylees and other immigrants from Central America. After each TPS renewal in Maryland, hundreds of people are lawfully present but lack the documentation to prove it.

## **Racial Profiling Particularly Likely in Frederick County**

Over the past decade, numerous studies have confirmed that police disproportionately stop and search minorities.<sup>58</sup> Police often argue that racial and ethnic disparities reflect higher rates of offenses among minorities, but studies have demonstrated that police stops produce no significant difference in the percentages of searches that find evidence of lawbreaking for minorities and whites.<sup>59</sup>

Racial profiling significantly injures the relationship between the community and law enforcement agencies. Communities of color often have a tense relationship with the police force, and enforcement of immigration law by local and state police will likely further distrust in law enforcement. It is probable that Frederick's 287(g) agreement will lead to racial profiling, which will affect citizens and legal residents as much as undocumented immigrants.<sup>60</sup>

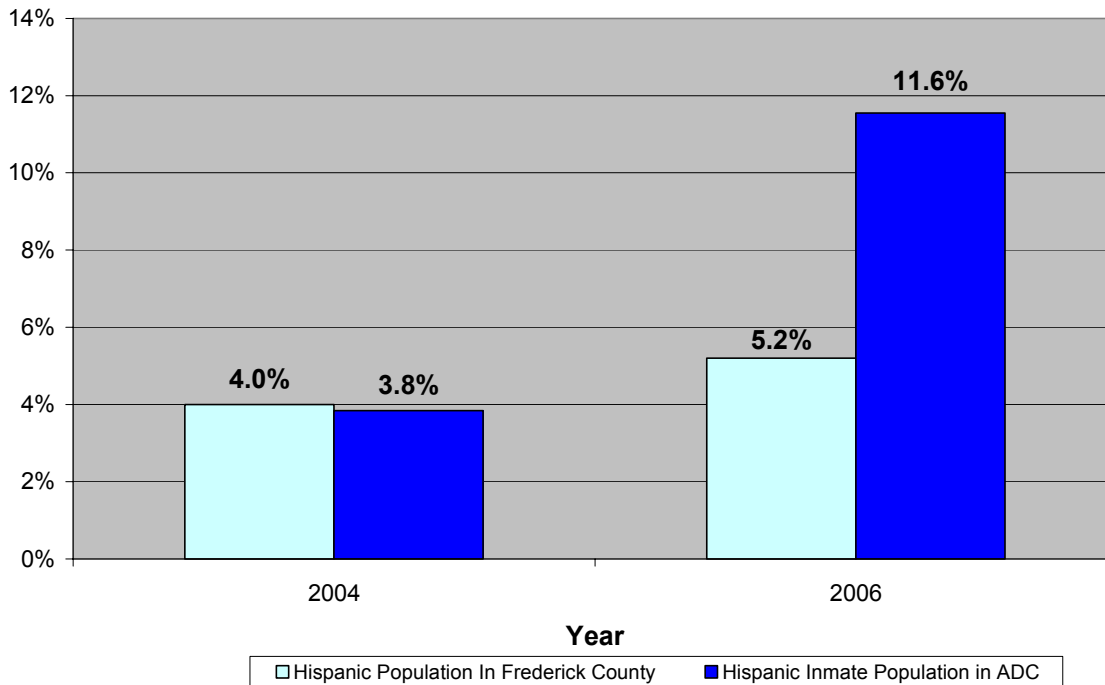
A Frederick News-Post analysis of the Frederick County Sheriff's Office traffic stops from 2002-2005 showed that "Hispanics were 60 percent more likely" to be stopped and blacks were nearly twice as likely as whites to be searched by county deputies.<sup>61</sup> The analysis found little evidence to support the benefits of police searches, and instead revealed that while 28% of whites searched actually had property or contraband seized, just 17 percent of blacks and 20 percent of Hispanics did. Unlike Maryland State and Frederick City police, who marked Hispanic drivers separately from other races and ethnicities, the majority of Sheriff's deputies instead characterized Hispanics as "white" or "other."

### ***Over-incarceration of Latinos already happening in Frederick County***

The Latino inmate population at Frederick's Adult Detention Center (ADC) has increased dramatically over the last three years, far outpacing the growth of the Latino population in Frederick County.

The incarcerated Latino population has increased approximately 300% in the last three years, and in 2006 the percentage incarcerated is more than double the population percentage of Latinos in the county.<sup>62</sup> The plot unambiguously shows that the rate of Latinos being incarcerated is substantially greater than the rate of Latino residents.

## Latino Incarcerated Population



Source: Frederick County Sheriff's Office Corrections Bureau 2006 Annual Report, page 46, & US Census Bureau

With the already existing tendency toward racial profiling by the Frederick County Sheriff's Office, the poor collection of racial and ethnic data and the apparent over-incarceration of Latinos in the Sheriff-run Adult Detention Center, it is foreseeable that Frederick County Sheriff's office will continue to disparately focus resources on members of certain ethnic minority groups. Other jurisdictions have faced consequences from racial profiling as part of local enforcement of immigration laws, including expensive lawsuits that can further damage shrinking budgets and resources.<sup>63</sup>

For example, less than one year after signing a 287g agreement, Maricopa County, Arizona, now faces a class action lawsuit. The lawsuit alleges racial profiling against the Latino community by the Maricopa County Sheriff's office. In 2007, the plaintiff, a Mexican citizen with a valid U.S. visa, was stopped by officers from the County Sheriff's Office, and despite possessing valid immigration papers, was searched, handcuffed, and arrested. Without explanation or charge, the plaintiff was detained for nine hours until an ICE officer declared his papers valid.<sup>64</sup> Because the class action seeks declaratory and injunctive relief on behalf of the plaintiff and all other Hispanic residents of Maricopa County, a ruling in favor of the plaintiff will severely impact both the existing 287(g) agreement and the financial resources of the Sheriff's Office and the County.

## **Recommendations**

### **To Frederick County Sheriff**

- Terminate the 287(g) agreement with Immigration and Customs Enforcement
- Implement a policy that there will be no pre-arrest inquiries into immigration status in the County.
- Implement a policy that victims' immigration status will not be inquired into even if victim is also an alleged perpetrator (e.g. domestic violence) and follow that policy
- Provide humane access to immigration detainees in the Frederick County Adult Detention Center in accordance with federal guidelines.
- Investigate the cause of the rise of Latino inmates in the Adult Detention Center, and publish a report on the findings.
- Correctly identify Latinos during police stops and publish all police stop data.

### **To Frederick County Commission on Human Relations**

- Initiate investigation into racial profiling at the Frederick County Sheriff's Office.
- Initiate investigation into why the ADC Latino population has experienced a precipitous jump.

### **To Frederick County Department of Social Services**

- Investigate resources necessary in the event of mass deportations and publish a plan for community response to include at a minimum:
  - o Foster care
  - o Counseling for young people who have lost their parents

### **To Frederick County Public Schools**

- Investigate resources necessary in the event of mass deportations and publish a plan for community response to include at a minimum:
  - o Methods for maintaining enrollment when children have lost their legal guardian and a new legal guardian has not yet been established.
  - o Implement counseling for young people who have lost their parents

## **Acknowledgements**

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## Appendix

### *Data & Methodology*

Methodology: We examined data of the number of law enforcement agents from Frederick County Adult Detention Center (ADC), Frederick County Sheriff's Sworn Deputies, Prince William County Officers, Prince William County Sheriff's Sworn Deputies, and Manassas City and Park Police who had received immigration enforcement training from ICE in relation to (1) the total law enforcement agents, (2) the number of persons living in the locality, and (3) the number of foreign born person living in the locality. These five localities were chosen because they made up the 36 officials who attended the Immigration Enforcement 287g Training at Frederick County in February<sup>65</sup> 2008.

#### **Percentage of Force trained**

Locality	# of LEA trained	# LEA	%
Frederick County ADC Correctional Officers	16	65 <sup>66</sup>	24.6%
Frederick County Sheriff Sworn Deputies	10	120 <sup>67</sup>	8.3%
Prince William County Officers	6	500 <sup>68</sup>	1.2%
Prince William Sheriff Sworn Deputies	2	95 <sup>69</sup>	2.1%
Manassas City & Manassas Park Police	2	63 <sup>70,71</sup>	3.2%

Sources: Operating and Capital Budget of Frederick County Government FY 2008, Prince William County Police Department Website, Sgt. J. Hollabaugh, City of Manassas FY 2008 Adopted Operating Budget, Manassas Park Police Organization Chart

We calculated the percentages from the number of Frederick County Sheriff's sworn deputies and ADC Correctional Officers who received the 287g Training and the number of sworn deputies in the Frederick County Sheriff's Force. The number of Frederick County Sheriff's deputies and ADC Officers was taken from the Operating and Capital Budget of Frederick County Government<sup>72</sup>. Similarly, the number of Manassas City and Manassas State Park Police was found in the 2008 Adopted Operating Budget<sup>73</sup> and the 2008 Park Police Organizational Chart<sup>74</sup> Prince William County Officers. Lastly, we examined the number of Prince William County Officers<sup>75</sup> and the number of Prince William County Sheriff's Sworn Deputies<sup>76</sup> to the number trained in immigration enforcement.

The number of officers trained in immigration enforcement was obtained from two US Immigration and Customs Enforcement News Releases<sup>77</sup>. By taking these numbers and dividing it by the general population in the specific locality, identified on the US Census<sup>78</sup>, we were able to determine the number of officers trained per 10,000 people.

The third plot compares the number of officers trained to the number foreign-born persons in the seven localities per 1,000 people. The foreign-born population data was

taken from the US Census Bureau<sup>79</sup> and the number of officers trained taken from the US Immigration and Customs Enforcement<sup>80, 81</sup>.

**Number of enforcement official trained in comparison to the population of jurisdiction**

Locations	Frederick County, MD	Prince William County, VA	Manassas City, VA	Hall County, GA	Whitefield County, GA	Cabarrus County, NC	Butler County, OH
Population, 2006 estimate (Manassas City Year 2003)	222,938	357,503	37,166	173,256	92,999	156,395	354,992
# of trained LEA in locality	26	8	2	9	6	5	8
# of population per officer trained	8,575	44,688	18,583	19,251	15,500	31,279	44,374
# of officers trained per 10,000 people	1.17	0.22	0.54	0.52	0.65	0.32	0.23
# of Foreign born persons per officer trained, 2000	343	5,139	2,639	3,119	2,573	1,470	1,198
officer trained per 10,000 Foreign born persons	2.92	0.19	0.38	0.32	0.39	0.68	0.83

**Number of persons of Latino origin & Number of Foreign born persons in MD & Frederick County**

	2006		2000		1990		1980	
	Maryland	Frederick County	Maryland	Frederick County	Maryland	Frederick County	Maryland	Frederick County
Population, estimate	5,615,727	222,938	5,296,486	195,277	4,781,468	150,208	4,216,933	114,792
Persons of Hispanic or Latino origin, percent,	6.00%	5.20%	4.30%	2.40%	2.6%	1.1%	NA	NA
Number of Hispanic or Latino, origin	336,944	11,593	227,916	4,664	125,102	1,713	NA	NA
Foreign born persons, percent	10.60%	8.7%	9.80%	4.00%	6.56%	2.10%	4.64%	NA
Number of Foreign born persons (2004 not 2006)	595,089	19,437	518,315	7,779	313,494	3,073	195,581	NA

### Frederick County Sheriff Budget

	Number of FTE	Total Salary & Wages & Fringe Benefits	Average salary of FTE	# FTE trained for 287g agreement	Average salary/52*4	Amount of salary used for 287g agreement	Staff cost (for year)
Operations: Law Enforcement	210	\$17,461,410	\$83,150	10	\$6,396.12	\$63,961.21	\$831,495.71
Adult Detention Center	123	\$9,689,459.	\$78,776	16	\$6,059.70	\$96,955.19	\$1,260,417.43
					Total	\$160,916.40	\$2,091,913.14

### Frederick County Adult Detention Center & Frederick County Population

YEAR	2000	2001	2002	2003	2004	2005	2006
Average Daily Prisoner Population				429	452	466	497
Hispanic Inmate Population in ADC			3.1%	3.6%	3.8%	6.1%	11.5%
Hispanic Population In Frederick County	2.4%				4.0%		5.2%
Average Hispanic Inmate Pop				15	17	28	57

## Endnotes

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- <sup>1</sup> THOMAS J.C. WILLIAMS, HISTORY OF FREDERICK COUNTY, MARYLAND, FROM THE EARLIEST SETTLEMENTS TO THE BEGINNING OF THE WAR BETWEEN THE STATES (Higgins Book Co. 1996) (1910), available at <http://www.frederick.com/misc/history.asp>
- <sup>2</sup> Historical Society of Frederick County, <http://www.hsfinfo.org/education/documents/LANDMARKSHISTORY.pdf> (last visited Apr. 21, 2008)
- <sup>3</sup> WILLIAMS, *supra* note 1 at 248
- <sup>4</sup> M.D. Department of Labor, Licensing and Regulation, *Fact Sheet by Workforce Investment Area and County (WIA)*, available at <http://www.dllr.state.md.us/lmi/wiafacts/>. See also Frederick County Office of Economic Development, *Fast Facts Labor Force*, <http://www.discoverfrederickmd.com/fastfacts/people/labor.cfm>.
- <sup>5</sup> U.S. Census Bureau, 2006 American Community Survey. See also Frederick County Office of Economic Development, *Fast Facts Labor Force*, <http://www.discoverfrederickmd.com/fastfacts/people/labor.cfm>
- <sup>6</sup> Frederick County Office of Economic Development, *Fast Facts Agriculture*, <http://www.discoverfrederickmd.com/business/highlight/agriculture.cfm>
- <sup>7</sup> M.D. Department of Business and Economic Development, *Frederick County Brief Economic Facts*, available at <http://www.choosemaryland.org/Resources/pdffiles/briefeconomicfacts/FrederickBEF.pdf>
- <sup>8</sup> WIA, *supra* note 4.
- <sup>9</sup> Nancy Hernandez, *Hispanic Community in Frederick Continues to Grow*, The Frederick News-Post, Sept. 18, 2005.
- <sup>10</sup> Liza Gutierrez, *Hispanic Chamber of Commerce Hits Milestone*, BUSINESS GAZETTE, Jan. 11, 2008, available at [http://www.gazette.net/stories/011108/businew181413\\_32368.shtml](http://www.gazette.net/stories/011108/businew181413_32368.shtml).
- <sup>11</sup> David Montgomery, *Diversified Assets—In Frederick, Latinos are Weaving A Community in which Triumph and Tragedy are a Part of the Fabric*, WASH. POST., Apr. 3, 2007 at C01.
- <sup>12</sup> *Id.* (quoting Frederick chapter Mid-Atlantic Hispanic Chamber of Commerce member, Tomas Wilfredo Rivas).
- <sup>13</sup> William Kandel, *Amber Waves: Hired Farmworkers a Major Input for Some US Farm Sectors*, U.S. Department of Agriculture, Economic Research Service, Apr. 2008, available at <http://www.ers.usda.gov/amberwaves/april08/features/hiredfarm.html>
- <sup>14</sup> Frederick County Government Website. "Past Sheriff's of Frederick County". <http://www.co.frederick.md.us/index.asp?NID=766>
- <sup>15</sup> Special Reports, Local Elections 2006, WASH. POST.COM, [http://www.washingtonpost.com/wp-srv/metro/elections/2006/maryland/candidates/Chuck\\_Jenkins.html](http://www.washingtonpost.com/wp-srv/metro/elections/2006/maryland/candidates/Chuck_Jenkins.html) (last visited Apr. 18, 2008) (According to Jenkins, the most urgent problem facing his jurisdiction at the time of his campaign was "the increase in violent assaults and other street crimes, and the growing criminal enterprise... a direct result of the increase in street gang activity, much of which is fueled by the nationwide illegal immigration problem. The fact that Frederick County is home to a number of potential terrorist targets presents the immediate need to have completed and in place a strategic countywide plan for homeland security").
- <sup>16</sup> Sherry Greenfield, *Influx of Immigrants Causes Big Changes*, GAZETTE.NET, Sept. 20, 2007, [http://www.gazette.net/stories/092007/newmnew73034\\_32392.shtml](http://www.gazette.net/stories/092007/newmnew73034_32392.shtml).
- <sup>17</sup> Montgomery, *supra* note 11 at C01.
- <sup>18</sup> Nicholas C. Stern, *Visa Caps Could Hurt Local Business*, The Frederick News-Post, Dec. 23, 2007.
- <sup>19</sup> U.S. CENSUS BUREAU, State and County QuickFacts, available at <http://quickfacts.census.gov/qfd/states/24/24021.html> (last visited Mar. 30, 08) (8.5% identified themselves as black, 3.5% as Asian, and 5.2% as Hispanic or Latino).
- <sup>20</sup> *Id.* (2006 population of county and Latinos; 2000 population of foreign born).
- <sup>21</sup> See IMMIG. & NAT'LITY ACT, 8.U.S.C. § 1357(g) (Deering, LEXIS through April 2008 amendments). See also *Fact Sheet, Section 287(g), Immigration and Nationality Act; Delegation of Immigration Authority* (June 22, 2007), available at <http://www.ice.gov/pi/news/factsheets/070622factsheet287gprogover.htm>
- <sup>22</sup> Marge Neal, *Jenkins Defends Immigration Program*, Frederick News Post, Feb. 8, 2008 (Quoting Sheriff Jenkins), <http://www.fredericknewspost.com/sections/news/display.htm?StoryID=71005>.

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- <sup>23</sup> U.S. IMMIG. & CUSTOMS ENFORCEMENT (ICE), *ICE Agreements of Cooperation in Communities to Enhance Safety and Security: ICE ACCESS Fact Sheet*, Mar. 2008, [http://www.ice.gov/doclib/pi/news/factsheets/iceaccess\\_factsheet.pdf](http://www.ice.gov/doclib/pi/news/factsheets/iceaccess_factsheet.pdf)
- <sup>24</sup> <http://www.co.frederick.md.us/index.asp?NID=744>
- <sup>25</sup> Frederick County Sheriff's Office Law Enforcement Bureau. 2006 Annual Report, page 12. <http://www.co.frederick.md.us/documents/Sheriff%27s%20Office/2006%20Annual%20Report.pdf>
- <sup>26</sup> Maryland Gangs: Information and Prevention, Gang Activity and Resources by Location, <http://gangs.umd.edu/wfrmByLocationDetail.aspx?county=Frederick> (last visited March 31, 2008).
- <sup>27</sup> Telephone Interview by Megan Reinstein with Detective Robert Marker, Frederick City Police gang prevention officer (5/1/2008).
- <sup>28</sup> The Dallas Morning News. Criminal Alien Program still taking illegals arrested for minor offenses. Sunday, January 20, 2008, Brandon Formby. <http://www.dallasnews.com/sharedcontent/dws/news/localnews/stories/012008dnmetimmigholds.20740eb.html>
- <sup>29</sup> *Id.*
- <sup>30</sup> U.S DEP'T OF JUST., Office of Community Oriented Policing Services, *What is Community Policing?*, <http://www.cops.usdoj.gov/Default.asp?Item=36> (last visited Apr. 18, 2008).
- <sup>31</sup> For a state-by-state list, see NAT'L IMMIGR. CTR., *Laws, Resolutions and Policies Instituted Across the U.S. Limiting Enforcement of Immigration Laws by Local Authorities* (October 2007), available at [www.nilc.org/immlawpolicy/LocalLaw/locallaw\\_limiting\\_tbl\\_2007-10-11.pdf](http://www.nilc.org/immlawpolicy/LocalLaw/locallaw_limiting_tbl_2007-10-11.pdf).
- <sup>32</sup> Mary Beth Sheridan, *Va. Police Back Off Immigration Enforcement: Other Legislation, Fear of Abuse Cited*, WASH. POST, Jun. 6, 2005 at B01, available at <http://www.washingtonpost.com/wp-dyn/content/article/2005/06/05/AR2005060501347.html>.
- <sup>33</sup> Craig Ferrell Jr., *Immigration Enforcement: Is It a Local Issue?*, The Police Chief Magazine: The Professional Voice of Law Enforcement, available at <http://policechiefmagazine.org>. *Immigration Enforcement: Is It a Local Issue?* Page 1.
- <sup>34</sup> *Id.*
- <sup>35</sup> *Id.* at 4.
- <sup>36</sup> Reston Interfaith, Herndon, VA
- <sup>37</sup> Names given are pseudonyms. Compiled by VA-SCOPE, the Virginia Alliance for Sensible Community Policing Efforts.
- <sup>38</sup> Video of Press Conference. [http://frederick.granicus.com/MediaPlayer.php?view\\_id=2&clip\\_id=470&publish\\_id=&event\\_id=](http://frederick.granicus.com/MediaPlayer.php?view_id=2&clip_id=470&publish_id=&event_id=)
- <sup>39</sup> Memorandum of Agreement (MOA) between the US Immigration and Customs Enforcement (ICE), a component of the Department of Homeland Security (DHS), and the Frederick County Sheriff's Office (FCSO), completed February 5, 2008. (available from Frederick County Sheriff Records Office).
- <sup>40</sup> *Id.* at 7 and 8
- <sup>41</sup> Operating and Capital Budgets: Fiscal Year 2008 (Detailed Version). Section "Sheriff's Office" pg 51-61 & "Budgeted Positions" pg 142-143. <http://md-frederickcounty.civicplus.com/index.asp?NID=1286>
- <sup>42</sup> [(Average Salary of FTE of Operations Officer)/ (52 weeks in a year)\*(4 weeks of training)\*(10 FTE in Operations)] + [(Average Salary of FTE of ADC Officer)/ (52 weeks in a year)\*(4 weeks of training)\*(16 FTE in ADC)] = \$161,000.
- <sup>43</sup> [(Average Salary of FTE in Operations)\*10] + [(Average Salary of FTE in ADC)\*16] = \$2,091,913
- <sup>44</sup> Fiscal Impact on the State of Arkansas as the Result of Local Law Enforcement of Civil Immigration Law". Mexican American Legal Defense and Education Fund (MALDEF). Oct 15, 2007. <http://www.aila.org/Content/default.aspx?docid=23572>
- <sup>45</sup> US Census Bureau State and County Quick Facts. <http://quickfacts.census.gov/>. 2006.
- <sup>46</sup> *Id.*
- <sup>47</sup> Presentation given by Major Peter Meletis, Acting Superintendent of Adult Detention Center (ADC) in Prince William County, 287(g) Program Update July 10, 2007 – July 28, 2008. January 30, 2008. <http://www.pwccgov.org/documents/bocs/agendas/2008/0205/7-C.pdf> (hereinafter Meletis Presentation)
- <sup>48</sup> A 287(g) agreement authorizes local law enforcement not only to inquire about the immigration status of a person encountered, but also to arrest and detain the person, even if no crime is charged, a power historically reserved for ICE. In fact, federal regulations state that ICE must pick up a person within 48

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- hours of a non-criminal detention, or the person must be released. The Prince William County ordinance orders the police to inquire into immigration status of all those detained.
- <sup>49</sup> Resolution 07-609, as approved July 10, 2007 by Prince William Board of County Supervisors. <http://www.pwccgov.org/documents/bocs/briefs/2007/0710/res07-609.pdf>.
- <sup>50</sup> Prince William County memorandum from Chief of Police, Charlie T. Deane, to Board of County Supervisors Re. Results of County Police Study to Address Resolution 07-609. August 31, 2007. <http://www.pwccgov.org/docLibrary/PDF/006888.pdf> (hereinafter Deane Memo)
- <sup>51</sup> "28% Higher Property Tax Rate Eyed in Prince William". By Kristen Mack. Washington Post. Wednesday, February 27, 2008; Page B01. <http://www.washingtonpost.com/wp-dyn/content/article/2008/02/26/AR2008022603389.html>
- <sup>52</sup> Board downplays Immigrant Policy Changes, Revisions Prompted by Police Budget Cuts and Effort to Deflect Racial Profiling Claims, Kristen Mack, Washington Post, May 1, 2008, page B06. <http://www.washingtonpost.com/wp-dyn/content/article/2008/04/30/AR2008043003492.html>.
- <sup>53</sup> Amount based on 30 days of incarceration
- <sup>54</sup> Fiscal Impact on the State of Arkansas as the Result of Local Law Enforcement of Civil Immigration Law. Mexican American Legal Defense and Education Fund (MALDEF). AILA Doc. No. 07101574. <http://www.aila.org/Content/default.aspx?docid=23572> . Oct 15, 2007. (hereinafter Arkansas Fiscal Impact).
- <sup>55</sup> Unlike in Maryland, no ICE facilities were located in Arkansas, so the estimate included the cost of 30 days of incarceration that would not be reimbursed by ICE.
- <sup>56</sup> See for example *Melendres v. Arpaio*, a class action lawsuit filed in December 2007 in Maricopa County, Arizona, in the United States District Court for the District of Arizona. Mr. Melendres, a legal immigrant from Mexico, was detained for nine hours on alleged immigration violations by local officers, presumably trained under a 287(g) agreement. (Complaint on file with CASA de Maryland).
- <sup>57</sup> Arkansas Fiscal Impact, *supra* page 6.
- <sup>58</sup> Samuel R. Gross & Katherine Y. Barnes, *Road Work: Racial Profiling and Drug Interdiction on the Highway*, 101 MICH. L. REV. 651, 689 (2002).
- <sup>59</sup> *Id.*
- <sup>60</sup> *Forcing Our Blues into Gray Areas: Local Police and Federal Immigration Enforcement*, *supra* at 6.
- <sup>61</sup> Alison Walker-Baird and Nancy Hernandez, *Searching for Answers: Experts Say Disparity Among Stops Warrants Investigation*, Frederick News Post.com, Special Sections, Stopwatch, March 25, 2007. [http://www.fredericknewspost.com/sections/special\\_sections/stopwatch/story.htm?id=1](http://www.fredericknewspost.com/sections/special_sections/stopwatch/story.htm?id=1)
- <sup>62</sup> Hispanic population was 3.09% in 2003; 11.55% in 2006. Frederick County Sheriff's Office Corrections Bureau. 2006 Annual Report, page 46. <http://www.co.frederick.md.us/documents/Sheriff%27s%20Office/Adult%20Detention%20Center/Annual%20Reports/2006%20Corrections%20Report%20-%20Revised.pdf>
- <sup>63</sup> Craig Ferrell Jr., *Immigration Enforcement: Is It a Local Issue?*, The Police Chief Magazine: The Professional Voice of Law Enforcement, available at <http://policechiefmagazine.org>.
- <sup>64</sup> *Melendres v. Arpaio*, Complaint lawsuit filed in December in Maricopa County AZ at the United States District Court for the District of Arizona. (complaint on file with CASA de Maryland).
- <sup>65</sup> U.S. Immigration and Customs Enforcement. "ICE begins immigration training for Maryland and Virginia officers". February 4, 2008. <http://www.ice.gov/pi/news/newsreleases/articles/080204frederickcounty.htm?searchstring=287g%20AND%20agreements>.
- <sup>66</sup> Operating and Capital Budget of Frederick County Government. FY 2008 (Detailed Version) Page 143.
- <sup>67</sup> *Id.*, Page 142.
- <sup>68</sup> Prince William County Police Department Webpage. <http://www.pwccgov.org/default.aspx?topic=040036000020000666>
- <sup>69</sup> Telephone Interview by Lindsay Morris with 1st Sgt. J. Hollabaugh, Deputy Sutton, Prince William County Sheriff's Office, Prince William, VA. (3/21/2008).
- <sup>70</sup> City of Manassas, VA FY 2008 Adopted Operating Budget. Page 176. <http://www.manassascity.org/documents/Finance/Budget/FY2008/Adopted%20FY08%20Annual%20Operating%20Budget.pdf>.
- <sup>71</sup> Manassas Park Police. Department of Public Safety – Police. 2008 Organizational Chart. <http://www.manassasparkpolice.com/organization.htm>

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- <sup>72</sup> Operating and Capital Budget of Frederick County Government. FY 2008 (Detailed Version) Page 142 & 143. <http://md-frederickcounty.civicplus.com/documents/Finance/Budget/2008%20Operating%20&%20Capital%20Budget/FY2008%20Adopted%20Operating%20and%20Capital%20Budgets.pdf>
- <sup>73</sup> City of Manassas, VA FY 2008 Adopted Operating Budget. Page 176. <http://www.manassascity.org/documents/Finance/Budget/FY2008/Adopted%20FY08%20Annual%20Operating%20Budget.pdf>.
- <sup>74</sup> Manassas Park Police. Department of Public Safety – Police. 2008 Organizational Chart. <http://www.manassasparkpolice.com/organization.htm>
- <sup>75</sup> Prince William County Police Department Webpage. <http://www.pwcgov.org/default.aspx?topic=040036000020000666>
- <sup>76</sup> Telephone Interview by Lindsay Morris with 1st Sgt. J. Hollabaugh, Deputy Sutton, Prince William County Sheriff's Office, Prince William, VA. (3/21/2008).
- <sup>77</sup> US Immigration and Customs Enforcement News Releases, "ICE begins immigration training for Georgia sheriffs' offices and others 37 officers trained in first class of 2008". January 8, 2008 <http://www.ice.gov/pi/news/newsreleases/articles/080108hallcounty.htm?searchstring=287g%20AND%20agreements>
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- <sup>78</sup> US Census Bureau: State and Country Quick Facts. 2006 (for Counties) 2003 (for cities) <http://quickfacts.census.gov/qfd/states/24/24021.html>
- <sup>79</sup> US Census Bureau: State and Country Quick Facts. 2000 <http://quickfacts.census.gov/qfd/states/24/24021.html>
- <sup>80</sup> US Immigration and Customs Enforcement. "ICE begins immigration training for Georgia sheriffs' offices and others 37 officers trained in first class of 2008". January 8, 2008 <http://www.ice.gov/pi/news/newsreleases/articles/080108hallcounty.htm?searchstring=287g%20AND%20agreements>
- <sup>81</sup> US Immigrations and Customs Enforcement. "ICE begins immigration training for Maryland and Virginia officers". February 4, 2008. <http://www.ice.gov/pi/news/newsreleases/articles/080204federickcounty.htm?searchstring=287g%20AND%20agreements>