



# AGENDA REPORT

Finance Department

<b>DATE:</b>	April 21, 2026
<b>TO:</b>	Mayor Martinez and Members of the City Council
<b>FROM:</b>	Emily Combs, Director of Finance Mubeen Qader, Deputy Director of Finance Antonio Banuelos, Accounting Manager Ofelia Alvarez, Senior Buyer
<b>Subject:</b>	Update on the Sanctuary City Contracting and Investment Policy Ordinance
<b>FINANCIAL IMPACT:</b>	There is no fiscal impact for receiving this item.
<b>PREVIOUS COUNCIL ACTION:</b>	None.
<b>STATEMENT OF THE ISSUE:</b>	On June 5, 2018, the City Council adopted a Sanctuary City Contracting and Investment Policy Ordinance No. 12-18 N.S., which mandates that City staff provide a written update to the City Council. The ordinance allows exceptions when the City Council determines that no reasonable alternative exists, considering the availability of alternatives, the intent of the ordinance, and the quantifiable additional costs.
<b>RECOMMENDED ACTION:</b>	RECEIVE a written update regarding the steps taken to ensure compliance with the Sanctuary City Contracting and Investment Policy Ordinance – Finance Department (Emily Combs, Mubeen Qader, Antonio Banuelos, Ofelia Alvarez 510-620-6699).

## **DISCUSSION:**

As a Sanctuary City, the City of Richmond is committed to protecting all residents of our community. The goal of the adopted ordinance is to prohibit the City from contracting with any person or entity that provides the United States Immigration and Customs Enforcement (ICE) with any “Data Broker”, “Extreme Vetting” services unless the City Council makes a specific determination that no reasonable alternative exists. The ordinance also prohibits the City from investing in any of these companies and requires the City to include notice of these prohibitions in any Request for Proposals (RFPs), Requests for Qualifications (RFQs), and any construction or other contracting bids. The ordinance also requires that the City provide an annual report to the City Council on its enforcement.

The Finance Department works with all the City departments on this project. All departments have reviewed the "Sanctuary City Contracting and Investment Policy Ordinance" (Attachment 1). Departments have also completed the Departmental Sanctuary City Compliance Statement (Attachment 2). Any findings or requests for waivers were noted in the Departmental Sanctuary City Compliance Statement.

In addition, all Public Works construction bids, RFQs, RFPs, or any other solicitation issued by the City shall include the statement below:

SANCTUARY CITY CONTRACTING ORDINANCE COMPLIANCE STATEMENT  
Contractor agrees to comply with the provisions of the Richmond Sanctuary City Contracting Ordinance (SCCO, Ordinance No. 12-18). Contractor must submit the Sanctuary City Compliance Statement included herein along with the bid or proposal prior to execution of the contract.

Furthermore, the City Attorney’s Office requires all contracts to have the statement below and complete the Sanctuary City Compliance Statement (Attachment 3):

SANCTUARY CITY CONTRACTING ORDINANCE (SCCO)  
The Richmond Sanctuary City Contracting Ordinance No. 12-18 prohibits the City from granting and or retaining contracts with any person or entity that provides Data Broker or Extreme Vetting services to the U.S. Immigration and Customs Enforcement Division of the United States Department of Homeland Security (“ICE”).

### **Prohibition on Investment**

Implementation of the investment portion of the ordinance includes monitoring of the City’s investments on a regular basis. The City of Richmond does not have any investments in stocks, bonds, securities, or other obligations issued by any provider of Data Broker or Extreme Vetting Services to ICE. The investment policy was revised to include the following restriction:

In accordance with the Sanctuary City Contracting and Investment Policy Ordinance No. 12-18 N.S. Section 4 Prohibition on Investments, effective June 5, 2018, the City shall not make any investments in stocks, bonds, securities, or other obligations issued by any provider of Data Broker or Extreme Vetting services to United States Immigration and Customs Enforcement (ICE).

The ordinance also requires the City to adopt a plan with respect to pension fund investments to avoid investments in such entities. City employees are part of the California Public Employees' Retirement System (CalPERS). The City contacted CalPERS and encouraged them to avoid investing in such funds per the City ordinance and investment policy.

## **COMPLIANCE**

All departments completed the required Departmental Sanctuary City Compliance Statement and reviewed their contracts and activities for compliance. Based on departmental responses and Finance Department review, no exceptions to the Sanctuary City Contracting and Investment Policy Ordinance were reported during the 2025 reporting period.

## **DOCUMENTS ATTACHED:**

- Attachment 1 – City of Richmond Ordinance No. 12-18 - Sanctuary City Contracting and Investment Policy Ordinance
- Attachment 2 – Departmental Sanctuary City Compliance Statement
- Attachment 3 – Vendor Sanctuary City Compliance Statement