July 27, 2026

The Honorable Buffy Wicks
Chair, Assembly Committee on Appropriations
1021 O Street, Suite 8140
Sacramento, CA 95814

RE: SB 1103 (Pérez) Large Retail Stores: Immigration Enforcement: Reporting - OPPOSE (Request to Hold on Suspense)

Dear Chair Wicks and Members of the Committee:

On behalf of the California Retailers Association (CRA), I write in respectful opposition to SB 1103 (Pérez) and to ask the Committee to hold the bill on the Suspense File. CRA is mindful of the profound human stakes at the heart of this measure. No one in our community is indifferent to the fear and heartbreak that families across California are living through, and we share the author's and sponsors' desire to protect the safety and dignity of every human being. Our concern is not with that goal, but with a bill that would create real and unbudgeted costs for the state and all 58 counties at the very moment California is cutting services vulnerable Californians depend upon.

We appreciate the good-faith work of the author's office and the amendments adopted throughout the legislative process, and we hold the author and sponsors in genuine respect for their commitment to this issue. This letter focuses on the fiscal questions squarely before this Committee: what SB 1103 will cost, who will pay for it, and whether those costs are justified by a problem that existing law, with existing appropriations does not already address.

The June 24 Assembly Privacy Committee Amendments Created a New, Unfunded Mandate on Every California County

The most consequential change, via the amendments that were accepted in the Assembly Privacy Committee, was the transfer of responsibility for enforcement to all 58 California counties. As the Assembly Privacy Committee's own analysis explains, the recent amendments "*recast the bill to instead authorize counties to request access to surveillance videos and other documentation from all retail stores*." More specifically, the amended language provides that *"[e]very county board of supervisors shall select … [an] appropriate agency in the county to have the authority to access information on federal immigration enforcement activities at large retail stores*," and it further "*require[s] every county board of supervisors to empower an appropriate county agency to request access to surveillance footage and monitor federal immigration enforcement activity at large retail stores, if necessary*."[1] That is a new duty imposed by the state on local government. When the state directs counties to stand up a function they do not perform today, designating an agency, building a request-and-intake process, reviewing footage, and monitoring

[1] Assembly Committee on Privacy and Consumer Protection, SB 1103 (Pérez) Bill Analysis (as amended June 24, 2026), Comment #6 and proposed amendments. leginfo.legislature.ca.gov

enforcement activity, it raises serious questions of a reimbursable state-mandated local program under Article XIII B, Section 6 of the California Constitution and Government Code Section 17514. If the mandate is reimbursable, the state's General Fund absorbs the cost through the Commission on State Mandates claim process; if it is not reimbursed, counties must absorb it out of already-strained local budgets. Either way, the cost is real at a time when both the state and county budgets are spread very thin and essential programs are being scaled back or even cut. [2]

These Costs Land at the Worst Possible Moment for Vulnerable Californians

The 2026–27 state budget signed by the Governor closes a multibillion-dollar shortfall in part by scaling back the safety net. The budget reinstates the Medi-Cal asset test, forcing low-income seniors, many who are on fixed incomes, and Californians with disabilities, to spend down their savings to qualify for care, and it pulls back tens of millions of dollars from CalAIM programs that serve high-need individuals. Counties have also been forced to make painful budget choices: for example, Santa Clara County recently finalized their budget with sweeping cuts to jobs and healthcare, and as county after county must balance their budgets, they are trimming health and human-services programs to balance their books.[3]

In this budget environment, directing every county, especially small, rural counties that may never have a store covered under this bill, to designate staff, absorb records requests, and monitor federal enforcement is not a cost-free transparency measure. Every dollar and every staff hour devoted to a new monitoring function is a dollar and an hour not spent on the individuals that need and depend on the services that counties provide.

The State Already Has the Authority, and Funding, to Gather This Information

The premise of SB 1103 is that California lacks a way to document federal immigration enforcement. Respectfully, it does not. The Attorney General already possesses broad investigative authority and a funded Department of Justice and has used that authority repeatedly in immigration-related matters. The bill itself recognizes this: it authorizes the Attorney General to obtain retailer documentation by administrative subpoena and to seek injunctive relief. If the state's objective is to collect information about enforcement activity, that work can be done through the Attorney General's existing jurisdiction - without standing up a parallel apparatus in 58 separate county governments and without a new open-ended claim on the General Fund.[4]

Local Law Enforcement Already Has the Tools It Needs When a Crime Occurs

To the extent the concern is criminal conduct, violence, injury, or unlawful activity on retail premises, local law enforcement already has full authority under existing law to respond, investigate, and, where appropriate, obtain surveillance footage through established legal process. Nothing in current law prevents law enforcement from acting when a crime is taking place. SB 1103 does not fill a gap in that authority; it layers a new obligation on top of powers that counties already hold - an obligation that will itself require new funding to carry out.

Even the state's largest and most sophisticated county could not readily absorb that obligation. Los Angeles County adopted its 2026–27 budget with only $63.2 million in new ongoing local funding for all new programs

[2] Cal. Const. art. XIII B, § 6; Gov. Code § 17514 (reimbursable state-mandated local programs). leginfo.legislature.ca.gov

[3] "California governor signs 2026–27 state budget," reporting on Medi-Cal asset test reinstatement and CalAIM reductions (July 6, 2026). wsws.org See also "Santa Clara County finalizes budget with sweeping cuts to jobs, healthcare," The Mercury News (June 23, 2026). mercurynews.com

[4] Office of the Attorney General, press releases documenting immigration-related litigation authority (2025–26). oag.ca.gov

countywide, against more than $2.1 billion in unmet departmental needs, while operating under a hard hiring freeze imposed in February 2026. Of the County's roughly $13 billion in discretionary net county cost, all but $42.2 million was already committed before the fiscal year began. If Los Angeles, with 115,000 employees and a $50 billion budget, has no room in their budget for a new monitoring program without cutting something else, how will the state's smaller counties absorb these costs? SB 1103 does not identify where that money would come from, and the default would have to be the state.[5]

Unresolved Operational Costs Compound Fiscal Uncertainty

Finally, the practical concerns CRA raised before the Privacy and Consumer Protection Committee remain and, as we detailed in our letter to the Assembly Privacy committee, the bill's reporting definitions cannot be satisfied by surveillance technology alone: a camera cannot verify whether officers are ICE or local law enforcement, cannot confirm the legal purpose of an action, and cannot distinguish an immigration operation from a local plainclothes arrest. The expanded definition of "premises" reaches parking lots and adjacent public walkways that standard camera systems do not cover. These gaps invite disputes, and because enforcement runs through injunctive litigation brought by the Attorney General or county counsel, they invite public-sector legal costs that the fiscal analysis does not capture resulting in costs that cannot be substantiated at this time and can run into the millions of dollars in legal and court costs to the state and counties, at a time when neither jurisdiction can afford them.

Respectful Request

We share the Legislature's commitment to transparency and to the safety of every Californian, and we deeply respect the intentions behind this measure. Our concern is that, as amended, SB 1103 would place a significant and unquantified fiscal burden on both the state and all 58 counties at a moment when California can least afford it. For that reason, we respectfully request that the Appropriations Committee hold SB 1103 on the Suspense File.

Thank you for your thoughtful consideration of this sensitive and important matter.

Respectfully,



Jacob Brint
Legislative and Regulatory Manager
California Retailers Association

[5] County of Los Angeles, 2026–27 Recommended Budget press release ($63.2M new ongoing funding; $2.1B unmet needs; hiring freeze). lacounty.gov See also Final Changes Budget Fact Sheet ($42.2M uncommitted net county cost; 8.5% curtailments). file.lacounty.gov