

# Creating a Tactical Plan for Increased Immigration Enforcement



## **Step 1: Have the Necessary Conversation**

### **Understand your role**

To many employees, their employer is the most stable institution in their lives. Understand what you can and cannot do during an enforcement action to eliminate fear. Employees must understand the business cannot make this all go away, but everyone has rights guaranteed by the United States Constitution when on American soil.

### **Ownership must decide who needs to be part of this conversation**

Increased immigration enforcement is a charged, political issue with dozens of perspectives. Management must decide who needs to be part of this conversation. Examples of a tactical team would include:

- Ownership (for authority)
- Human resources (for legality)
- Production (for crew level buy-in)
- Operations (for organizational buy-in)
- Admin (for communications and organization)

### **Remove politics**

A company should only develop a tactical plan if they find consensus among the team of decision-makers. A tactical plan will not work if political disagreements remain. It is better to do nothing, than to try and implement a tactical plan that will cause dissent due to deep political differences. The tactical team must have an open dialogue without judgment or fear. Doing nothing is an option. Doing something is an option.

### **Determine an apolitical mission**

If the tactical team decides to proceed, it should develop a mission statement that can be communicated to the company. For example, all employees satisfied the I-9 process upon hire. Therefore, the company can take the position that, to the best of their knowledge, their employees have a legal right to work in the United States.

A sample mission statement could be: "We support our employees' right to work without interference."

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## **Step 2: Create an Internal Framework**

### **Institute Company Policy Regarding a Work Authorization Chain of Command**

The company should institute a policy that employee concerns or questions about the legal status of another employee must be brought to management. It is important to establish a chain of command if an employee has questions about another employee's work status. Employees should be encouraged not to contact federal authorities directly and go through HR or management. This does not mean the company condones unauthorized employees. It establishes that there is a defined policy in place to handle concerns. If an employee violates that policy you should not retaliate against them, but can reinforce that his or her actions should have been guided by company policy.

A sample employment policy is included at the conclusion of this document.

### **Use a text-based communication service like WhatsApp or GroupMe**

A text-based network is far more effective than normal company communications or a phone tree during an immigration enforcement action. The text-based network will operate as an emergency back channel. Employees must understand how this back channel will be used during an enforcement action. WhatsApp offers end-to-end encryption. GroupMe does not.

### **Use a watchword if the text-based network is already used for other purposes**

Consider a watchword to let employees know enforcement protocols are underway if a text-based communication network is already used company-wide. For example, a text of "Code Blue" would let employees know enforcement action is underway and protocols are in place.

### **Identify a spokesperson and back-up spokesperson to handle internal communications**

Identify the person who will provide regular updates on the communication network. Identify a back-up if that person is unavailable that day. This person should communicate with management, but not be the person who has to deal directly with agents during an enforcement action. He or she will not be able to do both.

## **Step 3: Clarify Expectations and Roles in the Field**

### **Establish the role of crew leaders**

Crew leaders will be the field reporters and communicate any information to their crews. Crew leaders must be trained and must accept this responsibility. Crew leaders should contact crew supervisors as soon as an enforcement action begins in the field. Crew leaders must be assured their crews understand their rights.

### **Establish the role of supervisors**

Supervisors play a key role. They will provide field support to crew leaders. Additionally, if there is enforcement activity at the shop, supervisors should keep as many people away as possible. More bodies just add to the chaos. Supervisors may also need to drive employees home if a return to the shop is not possible.

### **Consider alternative apparel or lack of reflective vests**

Many companies require logo wear or reflective vests in all work situations. A company can consider allowing employees to not wear reflective vests unless required by OSHA for that work zone.

### **Update Emergency Contacts and child-care/elder-care plans**

Employees should have an updated emergency contact on file. Employees must have a backup plan in place for child-care, elder-care, or other responsibilities in case of immediate detention or apprehension. Employees will not be afforded the luxury to contact others once detained and administrative employees will likely have to handle communication to the family on the employee's behalf.

### **Understand that Detention = Fear**

Reports are that fear is working its way through immigrant communities regardless of legal status. Employees have been detained for days only to be released after legal paperwork is provided. Fear will exist among front line workers whether or not they have legal work authorization or citizenship. Green Industry firms in other States have reported 30-40% attrition after an enforcement action on coworkers. That does not imply those workers are illegal, they are just scared.

## **Step 4: Monitor ICE Deployments and Understand How they Operate**

**Online ICE Movement Tracker - <https://www.iceinmyarea.org/en>**

A number of popular apps for tracking ICE sightings were removed from the iPhone and Android App stores in October. Web-based versions are still available. These tools let the public report and track ICE sightings in real time. Companies can check the map before traveling, share alerts, and avoid recent activity areas. The tool is in English and Spanish. It makes sense for office staff to review this tracker. By 10am, it is usually clear by the reports where ICE will be operating that day. <https://www.iceinmyarea.org/en>

### **How ICE Operates - as reported from other States**

Based on reports from other States, ICE has about 10 vehicles working in specific geographic areas. The vehicles consist of some trucks, some cars, some vans and a support vehicle. The support vehicle can be vans or a rented box truck where detainees are brought so ICE agents can continue with field work. These teams typically work in a geographic area for 2-3 days (72 hours) before moving to another location. Many of the vehicles are registered out of state and do not have license plates or tags. ICE is also using helicopters and drones. It is unclear how these have played a role in enforcement. Most landscape interactions in other States have been from trucks on the road.

Key locations for ICE detention and processing in Michigan are:

- North Lake Processing Center (Baldwin)
- Monroe County Jail (Monroe)
- Chippewa County Correctional Facility (Sault Ste. Marie)
- Calhoun County Correctional Center (Battle Creek)
- St. Clair County Jail (Port Huron)

New reports (unconfirmed) for 2026 facilities include:

- Romulus Facility: A new detention center in a converted warehouse, designed to hold hundreds of detainees.
- Rosa Parks Federal Building (Detroit): Houses ICE administrative and processing offices.
- Grand Rapids & Southfield: New ICE offices are being established at the Waters Center (Grand Rapids) and One Towne Square (Southfield).

The expansion follows a significant increase in detainees in 2025, with the Baldwin facility operating as one of the largest in the Midwest. Family members can locate individuals using the ICE Online Detainee Locator System at <https://www.usa.gov/detained-by-ice>

## **Step 5: Clarify Expectations and Roles at Headquarters**

### **Create a Tactical Response Team at Headquarters**

A small tactical response team should be in place with identified back-ups. This team will include:

- Internal spokesperson - communicate to field workers
- Lawyer communication - contact legal counsel and dialogue with legal counsel
- ICE communication - the point person who interacts directly with ICE agents. Review the judicial or administrative warrant. Enforce protocols if they do not have a warrant. It is best if ownership, a general manager, or someone with HR responsibility handles this.
- Recorder - Record interactions at HQ - a crew member or crew leader should record interactions in the field until a supervisor arrives
- Headquarters protocols - communicate with in-office headquarters staff that enforcement protocols are underway

### **Create signage and designate private areas off-limits to federal authorities without a warrant**

ICE agents may visit the shop without a warrant, but are prohibited from entering private areas. Train all workers to NOT allow ICE agents to enter your workplace and to abide by the posted signage. A worker can say, "I can't give you permission to enter. You must speak with my employer."

Simple signage should be placed at the entrance to all private areas that reads:

***Authorized Access Only - Federal Immigration Authorities are not Allowed Access without a Court-Issued Warrant***

### **Adjust Arrival Times**

In other States there have been reports of ICE agents arriving before a company was open for business. It may be wise to have employees start slightly after normal business hours to make sure managers are on location before any employees arrive at the facility. The greater the presence of management during attendance/roll call/dispatch the calmer the environment.

## **Step 6: ICE Interaction**

### **Stay calm, firm, and professional**

ICE visits can be stressful, but encourage all employees to remain calm. No one should run or attempt to flee. Assure employees that your company is compliant with all employment laws and they have rights.

Inform ICE officers that company policy requires legal review of any warrants before compliance.

### **Identify the type of warrant**

A judicial warrant must be signed by a judge and say "U.S. District Court" or a State Court at the top. Sometimes, ICE agents may try to use an administrative warrant to enter. But an administrative warrant does NOT allow agents to enter private areas without the employer's permission. Administrative warrants are not from a court. They say "Department of Homeland Security" and are on Forms I-200 or I-205. Without a judicial warrant, ICE agents need permission to enter private areas of a business.

If ICE is asking to search anything beyond the limitations of the warrant in possession, verbally state they do not have consent to search.

### **Judicial Warrants will most likely be served at home or at the place of business**

It is unlikely a judicial warrant will be executed out in the street or at a job site or traffic stop. Those interactions will be based on reasonable suspicion and not a judicial warrant.

When ICE provides an administrative warrant with an employee's name on it:

- Employers do NOT have to say if that employee is working on that day or not.
- Employers do NOT have to take the ICE agents to the employee named on the warrant (even if he or she is at work at the time).

### **Green Card holders should not lie, ever**

Any employee on a green card (permissible work visa) should remain silent or provide only the truth to federal authorities. It is federal law that if a green card holder lies to federal authorities, they run the risk of invalidating their work visa.

### **Company trucks and vehicles on the road are not safe harbor**

Public access negates privacy. Law enforcement, including ICE, has the right to approach and question individuals in a vehicle on a public roadway or in a parking lot that is open to the public, such as a restaurant or store lot. The owner of the property cannot forbid this.

An ICE or federal official needs "reasonable suspicion" to stop a car. To search the vehicle without a warrant, they must have "probable cause". By driving on public roads, drivers give their "implied consent" to be stopped by law enforcement if they have a legal reason to do so.

An employee should not assume that being in a company vehicle provides protection or safe harbor from an ICE interaction.

### **Employees must know what to say**

Crew members should be coached to say "I do not consent" or "I choose to remain silent." They may repeat that response to every question.

### **Use QR Codes, not detailed documents or phone numbers**

ICE stops are stressful. Employees will not be able to search for phone numbers or emails. Use a simple QR code in the truck to take them to a shared document or webpage with simple instructions on how to handle the encounter until a supervisor arrives.

### **Know the rules about proper identification**

Workers do not have to hand over any IDs or papers to ICE. All workers have this right. Employees are not required to show documents beyond what was already provided for employment verification. Because employees are concerned about detention, they may want to provide legal documentation at that moment to avoid a false apprehension. That is also their right.

Crew members should have a mix of original identification and photos of identification

- Non-citizen: valid Passport, green card, or work authorization card
- Citizen: U.S. driver's license, state ID, or U.S. Passport

Non-citizens should have photographs or copies of these documents and should not carry the originals:

- Immigration Status Documents – Green card, visa, I-94 arrival/departure record, or work permit.
- Proof of Legal Presence – USCIS approval notices, asylum applications, or pending immigration petitions.
- Employment Records – Work authorization documents (EAD), pay stubs, or employer verification letters.
- Travel History – Entry/exit stamps, travel itineraries, or prior immigration applications.
- Criminal Records – Police reports, court documents, or evidence of dismissed charges.
- Proof of Residence – Lease agreements, utility bills, or tax returns.

The employee should have an appointed family member who has access to these documents in their household. This family member will need to supply documents in case of detention or apprehension.

### **Employment Authorization Document (EAD) Cards – Risks**

An EAD card is issued by the U.S. Customs and Immigration Service that allows foreign nationals to work in the U.S. for a specific period of time. EAD cards look like the personal information page from a passport in card form. The cards will list the authorization "Category" and provide a letter-number combination (ex. C09).

## **Revoked EAD Status**

The Trump Administration has revoked certain EAD categories even though the expiration date on the card has not passed. For example, the Parole Program for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV) was revoked. The CHNV Category was C11. An employee may have used a valid EAD to satisfy the I-9 upon hire. This category was then revoked in April. This means that the employee has a card that says he or she can work in the United States, but the program has been terminated and the employee is no longer eligible to work in the United States. The employee would need to provide a valid I-9 alternative to their employer or employment must be terminated. This process will be true for any EAD category revoked by the administration.

In short, some employees may be confidently working not knowing their EAD category has been revoked.

## **How do I find out about Revoked EAD Categories**

USCIS has been using its E-Verify system to notify employers. The problem is that almost no Michigan companies use E-Verify or receives these alerts. It is best to consult:

<https://www.uscis.gov/save/current-user-agencies/guidance/faqs-on-the-effect-of-changes-to-parole-and-temporary-protected-status-tps-for-save-agencies>

## **Understand what records need to be surrendered**

Do not provide employee records without proper authorization. Employee records (I-9s, payroll) should not be handed over without legal review. ICE must present a subpoena or court order to access these records.

## **Enable shop cameras**

Many companies have shop and yard cameras for security purposes and these can also be used to record interactions with federal authorities. Make sure they are active in places where enforcement actions may occur such as a reception area, yard, or breakroom.

## **After ICE Leaves**

- Document everything: Agents' names, everything they did while on site and any requests they made.
- If any employees are detained, ask where they are being taken before ICE leaves the premises.
- Use the text-based network to indicate an all-clear.
- Let everyone on your team know that the company is always looking out for their best interests. Anything you can do to make your employees feel like they have a safe place to work has never been more important.

## **Do Two Dry-Runs**

Practice the response plan once. Make notes and implement changes. Then practice one more time. People will freeze. These are stressful encounters. It is natural that nerves will take over. That is why practice is important.

## **Step 7: Create a Secondary Support Framework**

### **Consider community advocates**

Most communities have local advocacy groups or individual advocates. These individuals should be contacted to record interactions as impartial observers. Most advocates are motivated to ensure that the enforcement action is legal and compliant. They are also skilled at managing the onlookers who will naturally gather. A listing of community advocate groups can be found at:

For Michigan:

<https://www.immigrationadvocates.org/legaldirectory/search?state=MI>

Even a motivated family member or friend can serve in this capacity. This person must be on-call during the work day.

### **Connect with a few other landscape companies and nurseries who do work in your community**

Landscape companies and nurseries should look out for each other. Have direct contact with a few other companies who do work in your area. Most crews will see other crews before their management does.

### **Select a corporate immigration attorney**

Members should consider creating a relationship with an immigration attorney. Here is a resource:

<https://www.justia.com/lawyers/immigration-law/michigan>

### **Select an immigration attorney to support your employees**

It is wise to offer a referral to employees for an immigration attorney. This does not need to be the corporate attorney for a number of reasons including cost, language barriers, and bandwidth.

<https://www.justia.com/lawyers/immigration-law/michigan>

At some point, the employment relationship may end and the former employee or their family may still need resources. Consider sharing this website from the Michigan Immigrant Rights Center:

<https://michiganimmigrant.org/immigration-legal-services>

### **What are State and Local Governments Doing to Prevent ICE Overreach? *State of Michigan***

As of early 2026, Michigan state officials, lawmakers, and advocacy groups are taking several steps to limit the impact of U.S. Immigration and Customs Enforcement (ICE) operations, particularly in response to concerns over aggressive tactics and potential overreach.

Key actions taken by Michigan to curb ICE overreach include:

Reporting and Monitoring Mechanism: Michigan Attorney General Dana Nessel launched an "immigration action reporting form" in February 2026, encouraging residents to report "concerning behavior" by federal immigration agents. This form can be accessed by going to:

<https://forms.office.com/pages/responsepage.aspx?id=h3D71Xc3rUKWaoku9HII0aT5LK3Ha1FDITudN3NXtARUNFNCFJUVFHTek5SSDhYWDIzNIJFTUhGNSQIQCN0PWcu&route=shorturl>

<https://forms.office.com/pages/responsepage.aspx?id=h3D71Xc3rUKWaoku9HII0aT5LK3Ha1FDITudN3NXtARUNFNCFJUVFHTek5SSDhYWDIzNIJFTUhGNSQIQCN0PWcu&route=shorturl>

### ***Local Governments***

Local governments cannot restrict ICE agents from using public property. That includes public buildings, roads, and sidewalks. Therefore, no local government can "prevent" ICE actions from occurring. Some local governments are considering or are passing ordinances that allow local law enforcement to take reports and engage with ICE agents and citizens during an interaction. This would allow for law enforcement to have an official record of an interaction.

Local government must play a stronger role in these interactions. It is advised to send emails to city leaders in the communities where you work where ICE is present.

Email: The Mayor

Copy: City Council, Village Manager, and Head of Law Enforcement

Sample Email:

*Dear Mayor [Last Name],*

*I'm writing to urge you to take stronger action to limit ICE enforcement in our community. I am a landscape company/nursery who does work in this town. Our community deserves to feel safe and supported—not fearful of being targeted in their own neighborhoods and workplaces.*

*While immigration enforcement is a federal issue, local leaders have a powerful role in setting the tone and protecting residents from unnecessary collaboration or intimidation. I ask that your administration review and strengthen local policies to ensure that our town does not assist or enable ICE operations.*

*This is a matter of dignity, safety, and trust for my employees. I appreciate your commitment to serving all residents, and I hope to see your leadership reflected in firm steps to safeguard our immigrant friends and neighbors.*

**Who are the best community resources to help when employers can no longer assist?** There are resources that an employer can offer, but there will be times that an employer must pass the needs for employee assistance to a more qualified entity. Two groups have established themselves:

**Local:** Michigan Immigration Rights Center

Website: <https://michiganimmigrant.org>

Detained Immigrant Information Line: 734-794-9963

**National:** The National Immigrant Justice Center

Website: [immigrantjustice.org](http://immigrantjustice.org)

### **Community Groups**

Many local community groups are available to assist. The Michigan Department of Human Services maintains a list on their website:

<https://www.michigan.gov/mdhhs/assistance-programs/migrant-services>.

## **Step 8: Manage Detentions**

### **Bookmark the Online Detainee Locator System**

Use this page to locate a detainee who is currently in ICE custody or who has been in U.S. Customs and Border Protection's custody for more than 48 hours.

<https://locator.ice.gov/odls/#/search>

### **Determine pay if an employee is detained**

If an employee is detained, the employer may have no contact for many days until the employee is released. The company should use all available PTO until the employee returns. If the employee is deported the employee should be terminated. Employers should be careful not to prematurely terminate employees in case the employee is released from detention and is allowed to legally return to work.

## **Step 9: Consider Communication Strategies for Clients**

Many landscape companies in other States have reported that clients have reached out in regard to ICE enforcement. If this is a priority, companies can consider different types of communication strategies.

### **Proactive Communication**

A proactive communication strategy consists of sending out a message to all current clients. This strategy is recommended if a company is running behind schedule due to attrition, layoffs, or delays.

#### **Sample:**

*Dear Clients:*

*Increased immigration enforcement and heavy ICE activity have slowed our typical operations this season. Jobsite enforcement and traffic stops have caused our crews to run behind schedule. The sporadic nature of these interactions makes it difficult to plan and staff accordingly. We ask for your patience and understanding during these extraordinary times for our business. We look forward to a time when we can return to delivering high quality service without delays and interruptions. We apologize for any inconvenience.*

### **Reactive Communication**

A reactive communication strategy consists of sending out a message to clients who reach out directly based on their concerns. Some of these clients may want to check-in while others may offer compassion, sanctuary, or even allowing a missed maintenance visit or schedule delay. This strategy is recommended for clients who want to help and be heard. These can be more personal.

#### **Sample:**

*Dear NAME:*

*Thank you so much for reaching out to us during these extraordinary times for our business. As you can imagine, our crews have had to deal with interactions and harassment over the past few weeks. This has led to increased fear and paranoia for our entire team. We are doing our best to manage our employees through this and it helps knowing that we have a client like you thinking of us. We look forward to a time when we can return to delivering high quality service without delays and interruptions. We apologize for any inconvenience this has caused. Thank you for your support. It means a lot.*

### **Sample Client Communication after an Employee was Detained**

This is a modified version of an email that was sent to a landscape firm's clients after an employee was detained. **Note:** this version removes specific references to the company and service area.

*Dear Clients:*

*Recently, one of our employees was taken by federal immigration officers while working at a client's property. We were deeply shocked and saddened by what occurred. Our immediate*

*priority has been to support our employees' families, ensure our staff's safety, and connect everyone with qualified legal and community resources.*

*Our company has always operated lawfully and with integrity. We complete all required employment verification paperwork, and we stand firmly against discrimination or profiling of any kind. We are working with local officials, advocacy organizations, and other small businesses to ensure transparency and to protect the dignity and safety of all who live and work in our community.*

***Many of you have asked how to help:***

- *Stay informed through verified local sources such as Newspaper/blog/Facebook page and the City of XXXXXXXX.*
- *Familiarize yourself with "Know Your Rights" guidance on what to do when encountering immigration enforcement.*
- *Support organizations assisting affected workers and families:*
  - *Michigan Immigration Rights Center (<https://michiganimmigrant.org>)*
  - *National Immigrant Justice Center ([immigrantjustice.org](http://immigrantjustice.org))*
- *Contact city and government leadership to express your feelings about what is happening in your community.*

*We're grateful for the compassion our clients and neighbors have shown. Our team members are valued, hardworking people who make neighborhoods beautiful every day. Thank you for your continued trust and understanding.*

*With appreciation,  
The Family and Team at XXXXXXXXXX*

## **SAMPLE:**

### **Policy on Questions Regarding Immigration or Employment Eligibility**

#### **Purpose**

This policy ensures that all employee inquiries or concerns related to another employee's immigration status or work authorization are handled appropriately, respectfully, and in compliance with federal and state laws. The company is committed to maintaining a workplace that is free from discrimination, harassment, and bias of any kind.

#### **Policy Statement**

Employees must not question, discuss, or speculate about another employee's immigration status, citizenship, or work authorization. Such topics are private and confidential. Any concerns or questions regarding these matters **must be directed only to Human Resources or upper management.**

#### **Procedures**

##### **1. Reporting or Inquiry:**

- If an employee has a legitimate concern related to another employee's employment eligibility, it must be reported directly to the Human Resources Department or an upper management representative.
- Employees should not confront or question their coworkers about their immigration or citizenship status under any circumstances.

##### **2. Confidential Handling:**

- HR or management will review and handle all reports discreetly and in accordance with applicable employment and privacy laws.
- Information about an employee's immigration or work status will not be shared except as required by law.

##### **3. Non-Retaliation:**

- Employees who make good faith reports through the proper channels will not be subject to retaliation.
- Employees who engage in harassment, discrimination, or gossip related to another person's immigration status may be subject to disciplinary action, up to and including termination.