



United States District Court of Central California  
*Kidd v. Noem*  
Case No. 2:20-cv-03512-ODW-JPR

## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

This notice discusses a proposed settlement agreement in a class action lawsuit, *Kidd v. Noem*. The purpose of this notice is to tell you about the terms of the proposed settlement, what happens next, and the options that class members have to object or not object to the settlement.

The deadline to submit an objection is June 20, 2025. More information on how to submit an objection is available below.

### ABOUT THE LAWSUIT

#### What is the *Kidd v. Noem* lawsuit?

The *Kidd v. Noem* lawsuit was filed in April 2020 and challenges certain alleged policies and practices of the U.S. Immigration and Customs Enforcement (ICE) when arresting or attempting to arrest community members for suspected violations of immigration law at their homes in Southern California. The lawsuit applies to ICE's activities in seven counties in Southern California: Los Angeles, Orange, Riverside, San Bernardino, Ventura, Santa Barbara, and San Luis Obispo Counties. This area is also referred to by ICE as the Los Angeles Area of Responsibility.

The lead plaintiffs for the class action part of the case are the Coalition for Humane Immigrant Rights (CHIRLA) and the Inland Coalition for Immigrant Justice (ICIJ). The organizations and law firms representing plaintiffs in the case are the American Civil Liberties Union Foundation of Southern California (ACLU SoCal), UC Irvine Immigrant Rights Clinic, and Munger, Tolles & Olson LLP (MTO).

In the class action part of the lawsuit, the plaintiffs are asking the Court to declare ICE's policies and practices unlawful, void those policies and practices, and order ICE to change its policies and practices in specific ways.

#### What are Ruse Class claims in the lawsuit that are being settled?

Only part of the claims in the *Kidd v. Noem* are being resolved by settlement. The

part of the case being resolved by settlement relates to the “ruse” class claims.

The **Ruse Class claims** challenge ICE officers’ alleged practice of not initially introducing themselves as ICE, and instead leading people to believe that they are some other form of law enforcement, such as local police. The lawsuit also challenges ICE officers’ alleged practice of making false claims about why they are visiting people’s homes. The plaintiffs argue that ICE officers use these practices to trick people into allowing officers to enter their homes or agreeing to come out of their homes where ICE officers can arrest them. This is because the officers do not have a judicial warrant (a legal document signed by a judge) that gives them the right to enter the home without consent.

The plaintiffs contend that these alleged ICE practices violate the Fourth Amendment of the United States Constitution, as well as the Administrative Procedure Act.

### Who is a member of the Ruse Class?

The class of individuals covered by the proposed settlement is defined as follows:

All individuals residing at a home in the Los Angeles Area of Responsibility where U.S. Immigration and Customs Enforcement has conducted or will conduct a warrantless civil immigration enforcement operation in which officers enter the home under a claim of consent, or where the individual exits their home at the request of ICE, without officers first verbally stating their true identity as immigration officers or their immigration law purpose.

The class includes those whom ICE targets for arrest as well as others living in the same home as a person targeted for arrest.

## ABOUT THE PROPOSED RUSE CLASS SETTLEMENT

The plaintiffs have reached a proposed settlement with the government regarding the Ruse Class claims and are now in the process of seeking court approval of the settlement terms.

Below is a summary of the proposed settlement for the Ruse Class claims. Please remember this summary is not the full settlement agreement. If you want to know more about the settlement, and read a full copy of the agreement, please visit: <https://www.aclusocal.org/en/kidd-v-noem-settlement-agreement>.

## What are the terms of the proposed settlement?

### **A. Verbal and Visual Identification Requirements**

- If ICE officers verbally identify as “police” or as an “officer” in connection with a civil immigration enforcement action, they should state that they are with “ICE” or “immigration” before asking to enter a home or asking someone to leave a home. In all cases, ICE officers must verbally identify as “ICE” or “immigration” upon making an arrest or as soon as it is practical and safe to do so.
- When conducting civil immigration enforcement actions, ICE officers will generally be equipped with identifiers on their clothing that clearly and prominently identify them with ICE.

### **B. Prohibited Ruses**

- ICE officers cannot identify as a specific state or local law enforcement (e.g., LAPD), probation, parole, detectives, or any other non-federal governmental agency when conducting a civil immigration enforcement action at a home.
- ICE officers cannot make false claims about why they, as government officials, are at the home. More specifically, when seeking consent to enter their home or ask someone to come outside, ICE officers cannot:
  - Misrepresent that their purpose involves danger to the resident and/or public safety.
  - State that they are conducting a criminal investigation when that is not true.
  - Show photos of people who are not the person they want to arrest, or identify other individuals by name, and falsely claim that they are looking for those other individual(s) at the home.
  - Falsely claim that there is a legal or safety problem with a resident’s car.
  - Claim they are conducting a parole or probation check if that is not true. ICE officers can only say they have permission to enter a home or require a resident to exit a home under a resident’s probation or parole terms if they first verify that the resident’s probation or parole terms authorize ICE to make such a claim.

### **C. Directives and Trainings**

- ICE officers in the Los Angeles Field Office will receive regular training on the changes to ICE policy described above.
- ICE officers in the Los Angeles Field Office will be trained on how to properly document and keep records of practices for immigration operations.

### **D. Documentation & Monitoring**

- For civil immigration arrests at a home, ICE officers will be required to document information about how they verbally identified themselves and represented their purpose for being at the home for a period of time. ICE

supervisor(s) will review officers' documentation to make sure officers are complying with the terms of the settlement agreement.

- ICE will provide some of this documentation to class counsel to additionally monitor compliance with the terms of the settlement agreement.

The terms of the settlement will generally be in place for a period of three (3) years. The settlement also requires ICE to pay class counsel \$2,600,000 in attorneys' fees and costs if approved by the court.

In exchange for the terms above, plaintiffs will agree to release, or drop, the settled claims in the lawsuit. Class members will not be able to bring these claims in any current or future lawsuit. However, this release shall not prevent class members from bringing claims that could not have been raised in this lawsuit, such as an individual suit for money damages, or efforts by the class to enforce this settlement. The proposed settlement does not involve the payment of money damages to Ruse Class members. Plaintiffs and their attorneys will also agree to release claims for attorneys' fees and costs related to the Ruse Class claims.

## **OPTIONS AS A CLASS MEMBER**

### **If you do not object to the proposed settlement terms . . .**

You do not have to do anything.

### **If you object to the proposed settlement terms . . .**

You may submit a statement asking the Court to deny approval of the settlement. You cannot ask the Court to order a different settlement. The Court can only approve or reject the settlement.

Any objection to the proposed settlement must be submitted by June 20, 2025.

Any objection submitted to the Court must be in writing. All written objections and supporting papers must clearly identify the case name and number *Kidd v. Noem*, Case No. 2:20-cv-03512-ODW-JPR (C.D. Cal). They can be submitted either by electronical filing, in person at any location of the United States District Court for the Central District of California, or by mail to:

Clerk of the Court  
United States District Court  
Central District of California  
First Street Courthouse  
350 West 1st Street  
Los Angeles, California 90012

With your objection, please be sure to include your name, address, telephone number (if available), your signature or e-signature, the portions of the settlement to which you object, and the reasons you object.

Alternatively, you may also mail your objection to:

Attn: Kidd Class Counsel  
Munger, Tolles & Olson LLP  
350 South Grand Avenue  
49th Floor  
Los Angeles, CA 90071

You may also email your objection to: [RuseClassCounsel@mto.com](mailto:RuseClassCounsel@mto.com)

You may also submit your objection via telephone by contacting: (213) 201-8900.

Plaintiffs' counsel will provide your objection to the Court assigned to this lawsuit, Honorable Otis D. Wright II, and to Defendants' counsel.

**IMPORTANT:** You cannot object to this settlement after the deadline has passed. Even if you object, you cannot "opt out" of this settlement if the Court approves it.

### When is the Final Approval Hearing for the proposed settlement?

The Court will hold a final Fairness Hearing on August 4, 2025 at 9:00 a.m.

At this hearing, the Court will determine the fairness, reasonableness, and adequacy of the proposed settlement. If you file a written objection in time, you may, but are not required to, attend the final Fairness Hearing for the proposed settlement, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. The Court will decide whether to allow members of the plaintiff class who timely served objections to speak at the hearing. The address for the Court is:

First Street Courthouse  
Courtroom 5D, 5th Floor  
350 W. 1st Street,  
Los Angeles, CA. 90012

The hearing date may change. If so, an updated notice will be posted.

### How do I get more information?

If you have questions about this notice or would like more information about the lawsuit, please contact [RuseClassCounsel@mto.com](mailto:RuseClassCounsel@mto.com) or (213) 201-8900.