



Guidance for IREM® members on Federal Immigration Enforcement

As of February 18, 2025

IREM is an international institute for property and asset managers, providing complete knowledge to take on real estate management's most dynamic challenges. That means knowledge prepared for the day-to-day and the one-of-a-kind: from solving the latest tenant crisis to analyzing market conditions. Since 1933 our members have made us the world's strongest voice for all things real estate management. Today, more than 18,000 leaders in commercial and residential management all over the world call us home for learning, certifications, and networking.

This guidance is for informational purposes only and is not intended to provide and should not be relied upon as legal advice. Real estate managers and their clients should consult their professional advisors.

IREM Chapters and individual members may find it beneficial to discuss responsibilities as well as possible best practices or recommended protocols that may guide members' interactions with law enforcement on property, including the receipt of legal process, such as subpoenas or warrants.

Each interaction will be unique, as each state or locality may have different policies and processes. Residential and commercial properties should consider general suggested guidance. Such topics may include, but are not limited to:

- Retain local counsel with relevant expertise who can provide informed advice.
- Develop a written protocol to guide interactions with law enforcement both during and after the conclusion of traditional business hours.
- Designate specific representatives who are authorized to: (a) communicate and engage with law enforcement agents; (b) review and assess papers presented by such agents; (c) accompany law enforcement while on the property; and (d) liaise with retained counsel.
- Train representatives to recognize and understand the import of papers presented by government agents, such as a judicial warrant signed by a judge, its scope, and date.
- Develop written protocol for the receipt of law enforcement process, such as a subpoena or presentation of a warrant, and work with retained counsel to confirm the scope of members' obligations when in receipt of a subpoena as opposed to other forms of legal process, such as a judicial or administrative warrant.
- Train other employees or on-site personnel (e.g., building engineering or cleaning crews, other staff) to direct law enforcement to the authorized representative upon arrival.
- Determine who will document interactions with law enforcement and retain relevant records, including the date, time, law enforcement agency, agency



personnel (and relevant contact information), purpose of the visit, and summary of interaction.

IREM would like to thank the Houston Building Owners and Managers Association (BOMA) for their contributions to this guidance.