Family Separation FOIA Response from ICE
Key Documents

Pages 268-273

June 2017 e-mails discussing ICE efforts to target parents of noncitizen minors living in the United States through the development of initiatives such as “Target TCOBorder Crossing Smuggling of Unaccompanied Minors.” That initiative would include 1) developing “target folders” of the parents or guardians of smuggled unaccompanied minors, 2) conducting “knock and talks” to determine the identities of the parents and guardians, and 3) conducting interviews of parents and guardians. If the HSI determined that the parents or sponsors paid “smugglers,” HSI would develop warrants of prosecution.

Pages 275-281

“Unaccompanied Alien Children Human Smuggling Disruption Initiative/ Concept of Operations (May 5, 2017)” — the document describes a 90 to 120-day operation with “an emphasis on the identification, investigation, and arrest of human smuggling facilitators, including, but not limited to, parents and family members.” The operation was intended to hold parents and sponsors “accountable for their role” in smuggling UACs into the U.S.

Pages 332-341

Records demonstrating that DHS was actively tracking the planning of family separation protests around the country. The documents include a list disseminated by DHS’s Office on Intelligence and Analysis of more than 600 protests that took place in June 2018 when public outrage about family separation practices grew. The lists—compiled by a private cybersecurity company for DHS called “LookingGlass” and shared with ICE’s investigative arm—include information such as the Facebook Event ID and the time and location of the protest.

The protests were to take place in churches, town squares and other community gathering places across the U.S., from Anchorage, Alaska to Boca Raton, Florida, as well as abroad, in places such as Mexico City and Amsterdam. The lists include detailed information about the location of the protests such as a specific dock in Ketchikan, Alaska, a park in Huntsville, Alabama, a street corner in West Hollywood, California, and a public library in Bozeman, Montana.
Pages 344-347

Documents showing DHS’s internal communications regarding the development of public messaging around family separation. The documents demonstrate that the agency sought to portray family separation as an effort to combat human smuggling and trafficking.

Pages 351-613

Human Smuggling/Human Trafficking Investigations Lesson Plan from ICE Office of Training and Tactical Programs (January 2018) and other HSI training materials related to trafficking and human smuggling.
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 - Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The Manchester New Hampshire Police Department (MPD) and Child and Family Services of New Hampshire (CFS) are jointly submitting a 2016 Enhanced Collaborative Model to Combat Human Trafficking Task Force grant for your consideration. MPD and CFS have closely collaborated on the preparation and submission of this application on behalf of the New Hampshire Human Trafficking Task Force. The applicants will be assisted by the three other members of the Task Force’s Core Team including ICE, Homeland Security Investigations (HSI), The US Attorney’s Office (USAO/NH), and Give Way To Freedom (GWTF). Together, the Core Team members pledge their continued active partnership with all members of the Task Force in order to realize its mission to develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in New Hampshire while focusing on the goal of developing and enhancing the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

This Letter of Intent affirms the commitment to collaborate between MPD and CFS, as well as all members of the Core Team, for the three-year period beginning October 2016 through September 2019, and beyond.

Additionally, as signaled by the Member Letter of Intent, the Task Force has actively engaged numerous local, state and federal agencies as its members and with support of this grant, if selected, will build a foundation on which to sustain progress well into the future.
Respectfully submitted,

Chief
Manchester Police Department

Chief Operating Officer
Child and Family Services of New Hampshire

Emily Gray Rice, United States Attorney
U.S. Attorney's Office, District of New Hampshire

SPECIAL AGENT IN CHARGE
ICE HOMELAND SECURITY INVESTIGATIONS, BOSTON, MA

DIRECTOR
GIVE WAY TO FREEDOM

Date

Date

Date
NEW HAMPSHIRE HUMAN TRAFFICKING TASK FORCE
ADVISORY COMMITTEE
LETTER OF INTENT

VISION: To end human trafficking in New Hampshire

MISSION: To develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in New Hampshire

DESCRIPTION: The New Hampshire Human Trafficking Task Force is a collaboration of law enforcement, service providers, attorneys, state agencies, and other community stakeholders for the purpose of improving the statewide response to human trafficking. Recognizing the complexity of the issue, as well as a fundamental lack of resources, the Task Force functions as a central hub where interested stakeholders can connect, collaborate, and maximize impact through collective and strategic action. The Task Force is organized around goal of developing and enhancing the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

1. to identify victims of all forms of trafficking;
2. to investigate cases and prosecute cases at the local, state, and federal levels; and
3. to provide comprehensive, victim-centered and trauma-informed services and support to all survivors - men, women, children, citizens and non-citizens.

Fundamental to the Task Force's efforts is the understanding that human trafficking impacts vulnerable people and populations, and any true response must include support to prevent and address vulnerability in whatever form it may take.

UNIVERSAL PROVISIONS

We the Undersigned Believe that:

- Human trafficking - both sex and labor - happens in New Hampshire;
- Human trafficking impacts all genders, ages, and nationalities and our response, including investigation, prosecution, services, training, and awareness must be inclusive;
- Collaboration is essential for success;
- Effective investigations, prosecutions, and services are victim-centered and trauma-informed;
- Preventing and responding to human trafficking requires a thoughtful and long-term approach, with policies and actions informed by data and experience;
- Audiences should be empowered with concrete ways they can be part of the response in their personal and/or professional capacity.

We the Undersigned Agree to:

- Work collaboratively on behalf of victims and in furtherance of the Task Force goals by bringing our knowledge, expertise and skills to ensure the use of victim-centered and trauma-informed approaches during investigations and the delivery of services;
- Respect the work and involvement of all members and each discipline's area of expertise and responsibility;
- Commit to conform to standards of investigating and prosecuting with diligence, integrity, and professionalism while maintaining respect for victims' rights and dignity;

The Draft Memorandum of Understanding is subject to the awarding of funds under the HJJ/JOVNC Enhanced Collaborative Task Force Grant. The declarations made herein signal an intent of the parties to enter into a collaborative effort for a period of 3 years beginning in October 2016 should funding be awarded. A final and formal draft detailing individual member commitments shall be developed and signed within 90 days of any award.
Support Task Force efforts by:
- Attending regular meetings;
- Collecting and sharing data;
- Adhering to policies and protocols drafted and adopted by the Task Force;
- Participating in the development and distribution of Task Force materials and information as relevant and appropriate;
- Participating in Task Force outreach events and/or trainings in a capacity that best fits each agency’s mission, resources, and expertise;
- Attending one orientation training delivered by the Core Team

**LEADERSHIP**

**CORE TEAM:** The New Hampshire Task Force is led by a Core Team comprised of Manchester Police Department, Child and Family Services of New Hampshire, Give Way to Freedom, the United States Attorney’s Office for the District of New Hampshire, and Immigration and Customs Enforcement, Homeland Security Investigations (HSI).

Guiding Principles of the Core Team:
- Core Team agencies are the leaders of the Task Force as a unit.
- The Task Force and its goals comprise a cohesive project, requiring a free flow of information between Core Team agencies, to the greatest extent practicable.
- All Core Team agencies are mutually accountable for the work of the Task Force within their roles, including prosecution of traffickers and protection of victims.
- Core Team agencies are responsible for ensuring that the Task Force is a proactive, results-oriented process that purposefully uses the vehicle of the task force to achieve the goals enumerated in the Enhanced Model.
MEMBERSHIP
We the undersigned comprise the NII Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

<table>
<thead>
<tr>
<th>Organization</th>
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<tr>
<td>Manchester Police Department</td>
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<td>Child and Family Services of New Hampshire</td>
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<tr>
<td>Give Way to Freedom Prosecutors</td>
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<td>Hillsborough County Prosecutor</td>
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MEMBERSHIP

We the undersigned comprise the NH Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

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<td>Salem Police Department</td>
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<tr>
<td>Internet Crimes Against Children Task Force Civil Enforcement</td>
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<td>United States Department of Labor, Wage and Hour Division</td>
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<td>United States Department of Labor, Office of the Solicitor</td>
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**MEMBERSHIP**

We the undersigned comprise the NH Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

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| Granite State Children’s Alliance          |
| **Signature:**                             | **Date:** |
|                                             | 5/3/16    |

| Merrimack County Advocacy Center:          |
| **Victim Services**                        |
| **Signature:**                             | **Date:** |
|                                             | May 3, 2016 |

| Crisis Center of Central New Hampshire    |
| **Signature:**                             | **Date:** |
|                                             | 5/5/16    |

| YWCA of Manchester                        |
| **Signature:**                             | **Date:** |
|                                             | 5/4/16    |

| International Institute of New England, New Hampshire |
| **Signature:**                                      | **Date:** |
| *See Attached Letter*                               |           |

| New Hampshire Coalition Against Domestic and Sexual Violence |
|-------------------------------------------------------------|----------|

Page 5 of 6
MEMBERSHIP

We the undersigned comprise the NH Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

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| Freedom Café | |
|-------------|
The Honorable Loretta E. Lynch
Attorney General of the United States
United States Department of Justice
Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Attorney General Lynch:

I am writing this letter to inform you that the New Hampshire Department of Health and Human Services, Division for Children, Youth and Families (DCYF) supports the New Hampshire Human Trafficking Task Force application for the Bureau of Justice Assistance (BJA) and the Office for Victims of Crime (OVC) Enhanced Collaborative Task Force Grant to Combat Human Trafficking. We intend to be part of the NH Human Trafficking Coordinated Community Response (CCR) Network. Specifically, DCYF, which includes both juvenile justice and child welfare, will collaborate closely with the Task Force through its advisory committee. The advisory committee will serve as interagency council. With the council, we will develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in NH.

The number of reported and investigated human trafficking cases has dramatically increased in NH. According to the National Human Trafficking Resource Center, cases have doubled over the past year and include both labor and sex trafficking. With the “National Survey of Drug Use and Health” identifying NH as third highest in the nation for illicit drug and alcohol dependence in 12–17 year olds and first in the nation for 18–25 year olds, the state stands in the midst of substance use disorder crisis. This perpetuates the human trafficking cases that are occurring in this state. The Division for Children, Youth and Families manages protective programs on behalf of New Hampshire’s children and youth and their families. DCYF staff provide a wide range of family-centered services with the goal of meeting the needs of parents and their children and strengthening the family system. Services are designed to support families and children in their own homes and communities whenever possible. New Hampshire believes we can enhance our current screening, assessment, treatment and recovery services for our most vulnerable population.

The Preventing Sex Trafficking and Strengthening Families Act, P.L. 113-183, requires title IV-E agencies to develop policies and procedures to identify, document, and determine appropriate services for children who are in placement, care, or supervision of a child welfare agency and who are at risk of becoming sex trafficking victims or who are victims of sex trafficking. The support this grant would bring will allow partners to join with the Department and other stakeholders to leverage existing community resources and initiatives to maximize our collective impact and ensure a comprehensive array of services for all victims of human trafficking in NH.
In order to realize the Task Force mission and goals and sustain our collaborative efforts we recognize, and therefore support this application for funding, the critical and undeniable need for dedicated staff that assures multi-sectorial integration of efforts, central coordination, planning and leadership, and the capacity to build sustainability beyond the life of the grant.

DCYF has been active on the Task Force for a number of years. My staff members and participate in setting priorities in carrying out the Task Force’s strategic plan to improve our response to Human Trafficking in NH. They lead our agencies efforts to develop NH’s child welfare response to Human Trafficking through their participation in the development of the “Attorney General’s Protocols to Combat Human Trafficking”. They work to ensure that DCYF has policy in place to guide staff when responding to victims of Human Trafficking. They worked closely with NH’s Department of Information Technology to design and implement the changes required in our Statewide Automated Child Welfare Information System (SACWIS) to support data collection and reporting on both sex trafficking and labor trafficking. leads the trauma work the DCYF has prioritized as a foundational practice for the next five years. is one of the DCYF’s trauma specialists for the state. Their deep understanding of trauma, youth and family needs, and best practices make them ideal candidates to serve on the Task Force.

Thank you for the opportunity to express our commitment to this important work.

Sincerely yours,

[Signature]

Lorraine Bartlett, MSW
Director
NH Division for Children, Youth and Families
May 9, 2016
U.S. Department of Justice

Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 -
Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The issue of human trafficking is a global problem that must be addressed through local action. In New Hampshire, the intersection of the opiate epidemic and human trafficking is especially concerning. The Governor's Commission on Drug and Alcohol Abuse commits to assisting the New Hampshire Human Trafficking Task Force with its goal of developing and enhancing the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services, by helping to promote capacity building through ongoing outreach to the Substance Use Disorder treatment and recovery community, those we represent, or those we serve.

We are pleased to offer this commitment to help address human trafficking, both sex and labor, to the New Hampshire Human Trafficking Task Force and to the citizens of the State of New Hampshire.
May 3, 2016

As a member of the NH Human Trafficking Advisory Committee, we agree to collaborate and adhere to the provisions in the New Hampshire Human Trafficking Task Force Advisory Committee's Memorandum of Understanding in furtherance of the Task Force's vision, mission, and goals.

We are eager to continue in our support of the Task Force initiatives to end human trafficking in New Hampshire.

Sincerely,

[Signature]

Marie R. Linebaugh, MSW
Program Director
May 5, 2016
U.S. Department of Justice
Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 - Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The issue of human trafficking is a global problem that must be addressed through local action. This letter affirms The New Hampshire Lodging and Restaurant Association’s intent to be part of the NH Human Trafficking Task Force, to collaborate with the other members in furtherance of the goals, and to adhere to those principles and commitments as stated in the draft MOU.

The New Hampshire Lodging and Restaurant Association has 700 members across the state, and is especially well positioned to support Task Force efforts to train our members on the identification and appropriate reporting of potential labor cases within the hospitality and restaurant industry, as well as sex trafficking cases. We commit to helping the Task Force implement such stakeholder trainings through the allocation of existing resources or facilities towards that effort.

Moreover, in order to realize the Task Force mission and goals and sustain our collaborative efforts we recognize, and therefore support this application for funding, the critical and undeniable need for dedicated staff that assures multi-sectorial integration of efforts, central coordination, planning and leadership, and the capacity to build sustainability beyond the life of the grant.

We are pleased to offer this commitment to help address human trafficking, both sex and labor, to the New Hampshire Human Trafficking Task Force and to the citizens of the State of New Hampshire.

Sincerely,

[Signature]

Mike Somers
President & CEO
New Hampshire Lodging & Restaurant Association
FW: HTTF Mission Statement

I believe this was ultimately our Grant Proposal submission. Let me know if this helps. Lots of info. Lots of signatures to get. It took some time to build this.

Resident Agent in Charge
HSI Manchester, NH
(617)459-1234
Part 1: Please identify the applicant point of contact (POC)

<table>
<thead>
<tr>
<th>Applicant POC</th>
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<tbody>
<tr>
<td>Organization Name</td>
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<tr>
<td>POC Name</td>
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<td>Phone Number</td>
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<td>Email Address</td>
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<td>Mailing Address</td>
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Part 2: Please identify the application

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<td>Project Title</td>
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<tr>
<td>Proposed Start Date</td>
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<td>Proposed End Date</td>
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<td>Funding Amount Requested</td>
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Part 3: Please identify the project location and applicant type

<table>
<thead>
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<tr>
<td>Project Location (City, State)</td>
</tr>
<tr>
<td>Applicant Type (Tribal Nation, State, County, City, Nonprofit, Other)</td>
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</tbody>
</table>
Part 4: Please provide a project abstract

Enter additional project abstract information. Unless otherwise specified in the solicitation, this information includes:

- Brief description of the problem to be addressed and target area and population
- Project goals and objectives
- Brief statement of project strategy or overall program
- Description of any significant partnerships
- Anticipated outcomes and major deliverables

Text should be single spaced; do not exceed 400 words.

**Project Abstract**

The Manchester New Hampshire Police Department (MPD) and Child and Family Services of New Hampshire (CFS), are applying to enter into a cooperative. MPD is requesting $728,493 and CFS is requesting $637,566 to develop the New Hampshire Human Trafficking Task Force (NH-HTTF), under the Enhanced Collaborative Model to Combat Human Trafficking Purpose Area 1 solicitation, Competition ID: [Redacted].

Human trafficking, both sex and labor, exists in New Hampshire. Cases span the entire state. Victims have been male, female, citizen and non-citizen, adults and minors. In 2013 stakeholders investigated 7 cases; in 2014, 6 cases; and in 2015, 6 cases. In 2013 and 2014 stakeholders prosecuted no cases, and in 2015 stakeholders prosecuted 4 cases. In 2015 stakeholders provided services to 60 victims. Data from 2013 and 2014 indicates services for victims but is only anecdotal.

The NH-HTTF is a multidisciplinary group of stakeholders convened with the goal of developing and enhancing the multidisciplinary trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:
- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, and federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

Over the 3 year project period the TF will formalize and enhance existing efforts and build capacity statewide by: 1) establishing and sustaining an effective leadership and structure that will engage necessary resources to support the goal; 2) making data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking within the geographic area; 2) identifying victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques; 4) conducting proactive investigations of sex and labor trafficking with goal of successful prosecution of cases at state or federal level; and 5) ensuring a comprehensive array of services are readily available to meet individualized needs of all victims.

The NH-HTTF is led by a core team comprised of MPD, CFS, ICE Homeland Security Investigations (HSI), The US Attorney's Office for the District of New Hampshire (USAO/NH), and Give Way To Freedom (GWTF).

Through this collaboration we will improve state efforts to identify victims; investigate & prosecute sex and labor cases at local, state, and federal level; and address the needs of victims through delivery of a comprehensive array of services.
Part 5: Please indicate whether OJP has permission to share the project abstract

If the applicant is willing for the Office of Justice Programs (OJP), in its discretion, to make the information in the project abstract above publicly available, please complete the consent section below. Please note, the applicant’s decision whether to grant OJP permission to publicly release this information will not affect OJP’s funding decisions. Also, if the application is not funded, granting permission will not guarantee that information will be shared, nor will it guarantee funding from any other source.

☐ Permission not granted

☐ Permission granted (Fill in authorized official consent below.)

On behalf of the applicant named above, I consent to the information in the project abstract above (including contact information) being made public, at the discretion of OJP consistent with applicable policies. I understand that this consent is only necessary to the extent that my application is unfunded; information submitted in an application that is funded (including this abstract) is always releasable to the public consistent with FOIA rules. I certify that I have the authority to provide this consent.

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Note: This document is to be submitted as a separate attachment with a file name that contains the words “Project Abstract.”
STATEMENT OF THE PROBLEM:

Sex and labor trafficking happen in New Hampshire, and cases span the entire state. While consistent data collection continues to be one of our main challenges, we know between 2013 and 2015 that stakeholders, including members of the current Task Force ("TF"), responded to the cases described below, all of which represent unique incidents.

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**Labor Investigations & Prosecutions:** There have been six documented investigations, involving construction, restaurants and clubs, home health care, and forestry, since 2013 (*source: ICE/HSI*). These cases occurred in Hillsborough, Merrimack, Grafton, Coos, and Strafford Counties. Perpetrators have been individuals, small businesses, and labor contractors. While none of the cases were prosecuted, two reached private settlements and another was pursued by the Department of Labor Wage and Hour Division (WHD) for workplace violations. One investigation was ultimately found not to be trafficking, however, under the directives of the United States Attorney's Office (USAO), potential victims were treated as such until investigating agents had clearly ruled out trafficking. This is standard operating procedures for our efforts, recognizing victims often come to our attention in ways in which they are not readily identified as victims of trafficking.

**Sex Investigations & Prosecutions:** There have been 17 sex trafficking investigations since 2013 representing 25 perpetrators, 17 arrests, 12 indictments, 4 prosecutions and 8 convictions (*source: ICE/HSI, Manchester Police Department*). Several investigations are still ongoing. These cases have occurred in Hillsborough, Rockingham, and Merrimack Counties. A federal case from Rockingham County involving a 15 year-old runaway and 4 male defendants began in
spring 2014. Defendants were convicted on Mann Act charges in the fall of 2015, and sentenced to 5-8 years. Because it involved a minor engaged in commercial sex, this was a trafficking case.

A county prosecution in Rockingham involving the use of heroin to coerce adult victims into prostitution resulted in a sentence of 8-20 years incarceration. A county prosecution in Merrimack involving an adult couple selling two underage girls for sex came to light when they sought to sell one into a forced marriage. Two cases in Hillsborough are currently under indictment. Each case was prosecuted by a different jurisdiction, demonstrating both the scope of trafficking within the state as well as the active engagement by prosecutors.

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labor</td>
<td>8</td>
<td>2</td>
<td>1</td>
<td>11</td>
</tr>
<tr>
<td>Sex</td>
<td>unknown</td>
<td>unknown</td>
<td>60</td>
<td>60</td>
</tr>
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**Services for Labor victims:** Since 2013, 11 victims of labor trafficking have received services. Two were US citizen minors who received services from Child and Family Services of NH ("CFS", source: CFS). Nine were adult foreign nationals, some of whom entered the country legally, several on H2B visas, while others were undocumented. In one case, the victim arrived on a fiancé visa. Instead of marriage she was forced to care for an elderly man with dementia, and was not allowed to leave the house or socialize. Six were eligible for, and received support from the HHS/ORR National Human Trafficking Victim Assistance Program (TVAP) and an immigration attorney (source: International Institute of New England (IINE)). All 6 of those have received T visas. The remaining 3 received services from other programs (source: USAO, Give Way to Freedom, Catholic Charities NH). We identified an additional 11 potential labor victims that exhibited red flags but left the area or chose to return to their country instead of staying to pursue immigration relief (source: IINE). Where possible, providers worked to connect those individuals with services in their new location.
Services for Sex victims: For sex trafficking, data prior to 2015 is anecdotal and not included due to an inability to declare cases unique. A total of 60 victims received services in 2015 (source: CFS, NH Coalition Against Domestic and Sexual Violence (NHCADSV)). CFS served 6 victims: 2 minors, and 4 youth ages 18-21 who were coerced into prostitution. CFS identified an additional 26 potential victims ages 18-21 who disclosed trading sex for basic needs, but there was not enough information in the file to confirm force, fraud, or coercion. NHCADSV reported 54 victims served by its 10 members in 2015.

And these are not all. We face the same data challenges as the entire anti-trafficking field. For example, although we suspect trafficking in certain cases, the individuals involved have either not disclosed, and/or we have only been able to interact with them for a short period of time, not enough time to build the trust necessary to disclose. The latter is often due to a lack of services to meet their unique needs. Compounding this is the fact that within many TF member agencies, formal data tracking for human trafficking does not exist. The few agencies that do formally collect data only began to do so in 2015, and those agencies face a learning curve for staff, such that numbers are likely lower than reality. For example, CFS included questions related to trafficking in its database in late 2014. They have expressed that the combination of staff turnover and a learning/implementation curve is the likely explanation for the relatively low numbers of youth victims recorded over the last year. Law enforcement began to collect data early in 2015, but only as a by-product of intelligence sharing and case discussions within the Law Enforcement Committee. This challenge is discussed in further detail below.

Meanwhile, the diversity of cases we have seen illustrates the scope of the problem in NH. Victims tend to come from already vulnerable populations – foreign nationals, runaway and homeless youth, and those with substance use disorders, and are both male (6) and female (65).
adults (63) and minors (8), citizens (61) and non-citizens (10). We have identified cases in 6 of the 10 counties in the state. The majority came from the two largest counties, Rockingham and Hillsborough, in which lives approximately 53% of the total NH population, but cases have also been identified in Grafton and Coos, two of the more rural counties.

Characteristics of the NH geography, economy, and demographics, further support the data we do have. First, NH is a gateway to New England, New York, and Canada. Several known drug trafficking routes run through the state via I-95, I-93, I-89, and Rt. 16. It is well known that traffickers use these routes to transport victims, and our cases support this finding. For example, the Rockingham federal case described above involving a runaway was identified in Salem, NH which is located on the I-93 corridor, directly adjacent to the NH/MA border.

Second, NH is home to low-wage/low-skill industries that rely on migrant labor, such as hospitality/tourism in the White Mountains and Seacoast, agriculture and forestry in the North Country, and fishing on the Seacoast. Each year Merrimack and Belknap Counties host NASCAR races and Bike Week, and local law enforcement has raised concerns about labor trafficking due to the increase in temporary hotel staffing and traveling vendors.

Finally, there are a number of other populations that are more vulnerable to trafficking, including a large population of runaway and homeless youth in cities such as Manchester and Nashua, and an increasing number of individuals addicted to opiates and other drugs. Nationally it is recognized that about 30% of runaway and homeless youth engage in survival sex, and anecdotal evidence from CFS staff confirms this for NH. NH also have a significant opiate epidemic, and we have seen firsthand how individuals with drug addiction problems are vulnerable to trafficking. Virtually every sex trafficking case identified in 2015 involved the trafficker exploiting the victim’s heroin addiction to coerce them to engage in commercial sex.
acts. Within the past year, we have had one trafficking victim die as a result of heroin abuse.

**Previous or current attempts to address the problem:**

The Task Force has never received DOJ funding. It originated in 2012, when former NH Attorney General Michael Delaney convened a Commission to Combat Human Trafficking. Comprised of diverse stakeholders, the Commission operated through three Committees – Law Enforcement, Policy, and Community Engagement. Through 2013 and 2014 the group worked to amend state law, and began developing a best practice guide for professionals. By the end of 2014, we recognized the need for a more coordinated and operationalized effort, including a specific Victim Services component.

**Law enforcement and Service provider partnership:** Meanwhile, law enforcement and victim services continued to work together on cases. The two fields have a long history of such partnerships. Applicants Child and Family Services (CFS) and Manchester Police Department (MPD) work closely, including on all potential human trafficking cases as well as all emergency cases involving a youth at risk of abuse. In addition, other TF partners, including USAO, HSI, Give Way to Freedom (GWTF), and others, have a long history of collaboration. For example, during a 2012 case involving potential labor trafficking, the USAO, HSI, two legal service agencies, and one victim service agency worked together to set up an interview in a safe and comfortable location, ensure interpreters were available, and offer services and support. While the victims chose to return to their home country, the response set a standard for collaboration. This is reflected in a more recent case where Elliott Hospital notified partner HSI of a victim entering medical detox. Staff at Elliot, HSI, GWTF, and partner YWCA collaborated to meet and interview the victim, and arrange for a safe shelter upon her release from the hospital.

With this backdrop the current Task Force formed in June of 2015, building off of the
original Commission and existing collaborations between law enforcement and services. At the start we adopted the Enhanced Collaborative Model to Combat Human Trafficking (ECM) goals and objectives as our roadmap for operationalizing efforts. One key project we completed was a statewide survey, designed to give us an understanding of stakeholder basic awareness, knowledge and experience, and training experience and needs (herein after “Baseline Survey”). Respondents were from law enforcement, victim services, healthcare, youth services, legal services, prosecutors, educators, and businesses (collectively hereinafter “professional stakeholders”). These are fields the TF determined to be priorities due to an ability to investigate cases, identify victims, and/or provide support to all trafficking victims in NH. We received over 400 responses statewide. The results relate to the objectives for this project, and we intend to repeat the survey annually to measure improvements and identify ongoing gaps.

We have also met monthly to 1) develop a strong membership and structure that promotes collaboration, accountability, and sustainability; and 2) better understand the needs and priorities related to our goals and objectives. Through these efforts we have ascertained our overarching challenge: a lack of a formal system or infrastructure to respond to trafficking victims. We respond, and there are systems that we call on - primarily DV agencies - but they lack capacity and resources. We connect victims with services but the best way to describe this setup is, "we make it work as best we can." The benefit of what exists is that we have many interested partners, who have recognized the need and committed to supporting victims and statewide efforts to build capacity. The drawback is that none of these agencies have the capacity to manage the development of a system, stranding us in perpetual reaction mode. Efforts to develop protocols, to collect data, to coordinate training to stakeholders have all been stymied by lack of human resources. The work is often being done as an add-on by one dedicated person, and the
entire project collapses if that person leaves. This is not the way to build a sustainable, coordinated, state-wide response that identifies victims, proactively investigates and prosecutes cases, and provides comprehensive services to all victims.

Stemming from the knowledge that we must create the infrastructure, we have prioritized the following 7 specific **outstanding problems, gaps in services, and unmet needs regarding investigations, prosecutions, and victim services in NH:**

First, we need **dedicated case management** for all survivors. The only trafficking-specific case management services in NH are from the HHS/ORA per-capita National Trafficking Victims Assistance Program (TVAP) which is limited foreign national victims with or seeking HHS certification. Dedicated support for US Citizens, LPRs, and foreign nationals with immigration status such as asylees and refugees, however, does not exist. Often, survivors receive no case intensive management, putting them at risk of falling through the cracks of the multiple systems involved in their treatment and care. Those that do receive case management do so through other programs such as domestic violence crisis centers or runaway and homeless youth programs. Despite overlap in populations and services, the identification of more cases only adds to the workload of already overwhelmed staff, with the complexity of the survivor’s needs placing additional burdens on the limited resources of these programs. Moreover, without dedicated case management, professionals who have identified survivors are left uncertain as to whom to make referrals. As a result of these limitations to service, many survivors of trafficking leave soon after having been engaged, or decline services altogether.

Second, NH is facing a significant opiate crisis, and because of this many investigators are being diverted to drug investigations. Our law enforcement partners continue to be committed to investigating sex and labor trafficking, and they continue to investigate, share intelligence, and
provide support for investigation, but none have the capacity to commit a full time investigator that can focus solely on proactive investigations of sex and labor trafficking. This is especially true for the smaller jurisdictions that may lack even the basic capacity to investigate trafficking given the complexity and resource-intensive nature of such investigations.

Third, we need to create a stronger service network statewide. In our Baseline survey, 52% of respondents were unaware of resources for victims. When asked about their biggest challenge, law enforcement repeatedly indicates a lack of services. The gap here is not in the existence of services, but rather in the outreach, training, and ability to connect survivors with those services. This is especially true in the more rural counties.

Fourth, training for professional stakeholders remains a critical gap. While TF members have all had training, 37% of respondents to our Baseline Survey indicated they had received no training. Training has been concentrated in Hillsborough, Rockingham and Merrimack Counties. For the rest of the state training is scattered. This results in missed opportunities to identify victims. Law enforcement especially has indicated a need to train all officers statewide given their likelihood of encountering cases. On any given day investigators, including labor investigators, encounter potential victims while responding to other incidents, but not necessarily pursuing trafficking leads because they lack the training to identify it. The same is true for service providers, especially those in the Substance Use Disorder Community given the current opiate epidemic in NH, and the intersection of that and sex trafficking.

Fifth, we lack protocols. With no system in place, everything continues to operate informally. This creates confusion and delay investigations and services, and tends to involve more parties and information sharing than necessary which further jeopardizes investigations, prosecutions, and victim safety. As cases increase and we look to build out capacity state-wide, policies and
protocols are critical in order to ensure trauma-informed practices, confidentiality, safety, and that victims are connected with services.

Sixth, as described above, we lack a coordinated and systematic mechanism for collecting data. Data collection varies from anecdotal, to informal spreadsheets created by one engaged staff member, to actual database fields for a handful of agencies. The Division of Children, Youth and Families (DCYF), will implement data collection in the fall pursuant to a 2014 federal law. Notably, they will be collecting data on both sex and labor trafficking of children, although the law mandated it only for sex. Nonetheless, formal data collection by a handful of agencies is not enough. We cannot effectively develop a response until we better understand what we are seeing, and thus need to coordinate the sharing of that data, and extend formal collection to all TF members. For example we need to coordinate data collection so we better understand the challenges for victims in rural settings, and so we can make data informed decisions.

Finally, a challenge that connects all five of the others is a lack of dedicated management and coordination. A lack of dedicated coordination results in duplicative efforts, wasted resources, largely unrealized victim outcomes, and widely different messages among service providers, law enforcement, victims, and the general public. For example, when the TF first started meeting we discovered three groups were independently working on a curriculum for high school staff. A lack of dedicated coordination also means individual disciplines and members are left trying to organize, collaborate, and overcome barriers on their own, resulting in frustration and tension between organizations. Efforts to resolve this by identifying additional partners, formalizing a referral process, rolling out a consistent training for stakeholders, developing protocols and gathering data to inform our efforts, have repeatedly been stymied by the fact that no agency or person has the ability to dedicate enough time to manage such projects. The Task Force has had
the benefit of very basic part time interim coordination through support from GWTF and volunteer time, however as we formalize efforts and build out statewide there is a need for full time coordination to achieve our goal and objectives.

This funding will provide the starter funds to dedicate staff, provide training, and coordinate data collection and evaluation that we can then use to build out a system across the state, and show the state legislature and others the need to support such infrastructure building. We will hire two full time Intensive Case Managers (ICMs) to provide case management to all victims. They will act as central points for referrals and services, and through their work help identify additional resources that can be leveraged to create a stronger service network. Manchester PD will dedicated a full time investigator to focus solely on proactive sex and labor investigations, who can operate and support investigations statewide and support smaller jurisdictions that lack the capacity to engage in long term and complex trafficking investigations. We will use TIMs and PMT to collect data, providing us with a mechanism and basis to coordinate data collection, and will hire an evaluator to analyze collected data to inform our efforts. Funding will allow us to develop and deliver consistent training to stakeholders, and provide professional development to enhance TF member ability to investigate, prosecute, and provide services to all victims. And finally, funds for this project will allow us to hire a full time Project Director that can manage efforts, marshal resources, direct the inputs of all the partners, and guide the development of protocols to set consistent standards for response.

**PROJECT DESIGN AND IMPLEMENTATION:**

**Geography:** The TF will cover the entire state of NH. Given its small size in terms of population and geography, this approach is both reasonable and necessary. The ten counties in the state fall into three categories. First, Hillsborough which has strong law enforcement and
service provider partnership efforts. Second, Rockingham and Merrimack. Although not as robust as Hillsborough, both have strong foundations for law enforcement efforts and services. The third category comprises the rest of the state, where capacity is scattered.

Over the 3 year project period we will formalize and enhance efforts in Hillsborough, Rockingham and Merrimack Counties, and build capacity statewide in-order to achieve the goal of developing and enhancing the multidisciplinary trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, and federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

The TF will work together through dedicated staff, including a Project Director to oversee efforts; monthly meetings and continuous communication; case reviews; shared development and use of materials, protocols, and a common agenda; data collection and analysis; and additional ways as described below and in the Attachments. Specifically, the following five objectives and correspondent activities flow from and provide focus for our collaboration toward our goal:

**Objective 1:** We will make data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking in NH (“Obj. 1”). Key activities will include:

**Activity 1.1:** Manchester PD (MPD) and Child and Family Services of NH (CFS), along with project partners USAO, ICE/HIS, and GWTF (collectively hereinafter “Core Team”), have jointly developed a plan and process for routine collection of data. Data will be collected from law enforcement partners, service provider partners, and outreach/training efforts. It will be entered into TIMS and PMT as appropriate, and we will refine the plan as necessary if funded.

**Activity 1.2:** We will develop a process for sharing and analyzing data in order to develop a comprehensive understanding of trafficking in NH. This will include sharing data from TIMS.
and PMT at TF meetings, and analyzing through discussion at our quarterly Core Team meetings and with input from the Evaluator. Law enforcement will also work with the NH Intelligence and Analysis Center to identify ways they can assist efforts. The Project Director will work with Core Team partners and all TF members to develop protocols for data and information sharing.

**Activity 1.3:** We will coordinate on the submission of semiannual progress reports. Part of the role of the Project Director will be to coordinate the writing, compiling and submission of semi-annual progress reports, including pulling all necessary information from TIMS, PMT, and other TF records such as meeting minutes and attendance sheets. The Evaluator will assist.

**Activity 1.4:** The TF has partnered with Plymouth State University to provide project evaluation and assist with data analysis. The Core Team, in collaboration with Dr. Stephanie Halter, has developed the plan described in Attachment 6, to evaluate TF performance using both quantitative data from performance measures and qualitative data from stakeholders. The findings will be used to improve our efforts.

For additional details see Attachment 6, Plan for Evaluation and Data Collection.

**Objective 2:** We will identify victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques ("Obj. 2"). We have a committee comprised of representatives from law enforcement, victim services, and other stakeholders specifically for Training and Community Engagement (hereinafter "Training Committee"). The Project Director, with support from the Training Committee, will:

**Activity 2.1:** Develop training and public awareness materials with shared message. In the fall of 2015 we began developing shared materials, with the intent of cutting down on redundant efforts, establishing consistent messaging, and connecting stakeholders with trainings so that they can both identify potential victims, and interact (as appropriate, for instance with service
provider stakeholders) in a trauma-informed manner.

**Activity 2.2:** Ensure relevant stakeholders receive training. As described above, p. 6, the TF has identified 8 groups as relevant professional stakeholders. These are our priority audiences. We will provide training for these audiences and, whenever possible, our trainings and outreach will be performed jointly with a representative from both services and law enforcement.

For additional details see Attachment 5, Plan for delivering Training and Professional Development, and Attachment 3, Plan for Proactive Investigations.

**Objective 3:** We will conduct proactive investigations of sex and labor trafficking with the goal of successful prosecution of cases at state or federal level (“Obj. 3”).

**Activity 3.1:** Identify physical and organizational location of TF. Current efforts are a hybrid, combining Manchester PD, HSI, and other partners including State Police, Nashua, Salem, Hampton, and Portsmouth PDs. Physically this group is anchored in Manchester, with MPD and HSI as the organizational leads along with the USAO. Manchester is only a short distance from Concord where the USAO is located. This funding will allow us to formalize this arrangement and establish a collaborative Human Trafficking multi-jurisdictional unit.

Law enforcement staff will be co-located in office space provided by HSI, located at the Norris Cotton Federal Building, in Manchester. HSI Manchester hosts the New Hampshire Internet Crimes Against Children Task Force’s (ICAC) Computer Forensics Laboratory, and can thus leverage the ICAC’s computer forensics expertise to further investigations. The U.S. Department of Labor, Wage and Hour Division (WHD) is also in Manchester, making collaboration for labor investigations easier.

Additional activities for this objective include: **Activity 3.2:** Conducting proactive investigations; **Activity 3.3:** Developing clear protocols and procedures for victims’ rights and protections; and **Activity 3.4:** Implementing victim-centered and trauma-informed techniques.
Objective 4: We will ensure a comprehensive array of services are readily available to meet individualized needs of all victims ("Obj. 4"). With this funding the Task Force will:

Activity 4.1: Assemble comprehensive array of victim services, including formalizing and enhancing our existing service partnerships in Hillsborough, Rockingham and Merrimack counties, and building capacity state wide through dedicated staff, outreach and stakeholder training to ensure a comprehensive array of services are available to meet the individualized needs of all victims. CFS will hire two ICMs who will be located in Hillsborough and Rockingham Counties, but receive referrals for any case regardless of location. These are the 2 largest counties in terms of population, and over 50% of victims identified there.

Activity 4.2: Leverage (not duplicate) existing services. In Hillsborough and Rockingham the ICMs will leverage our existing service partnerships, described in more detail in Attachment 4, to ensure a comprehensive array of services for the majority of victims identified. CFS has the benefit of locations statewide, thus for referrals outside of Hillsborough and Rockingham, the ICMs will work with the closest CFS site, as well as the efforts of any TF members located in that area, to identify additional services that can be leveraged to meet the victim’s needs.

Activities 4.3 and 4.4: Services will be provided to all victims – sex, labor, foreign national, US citizen, and LPRs. CFS will provide case management to all victims, with the exception of certified foreign national victims which will be referred to the TVAP program administered by IIINE/NH. In the event that a foreign national victim is outside the capacity of IIINH due to location, CFS will seek permission from OVC to continue to provide support or work with the TVAP grantees such that CFS or another local partner can provide those services.

For additional details see Attachment 4, Plan for Delivering Comprehensive Services
Objective 5: We will establish and sustain effective leadership and a structure that will engage necessary resources to support the 3 goals (“Obj. 5”). Key activities include:

Activity 5.1: Identifying consistent, experienced, and committed task force leadership. Over the last 18 months we have worked to identify consistent, experienced, and committed task force leadership. The current leadership was identified through planning meetings between the USAO, AGO, GWTF, and HSI. Together they identified MPD and CFS as ideal leads for law enforcement and service provision and GWTF for overall coordination, given their respective experience, location, and organizational stability to support a sustained effort. MPD, CFS, and GWTF are joined by USAO, HSI to comprise the leadership (“Core Team”). All members of the Core team are responsible for leadership of TF efforts including participating in Core Team meetings and planning.

Detective Sergeant [redacted] represents MPD and non-federal law enforcement on the Core Team. He supervises and supports investigations, and co-leads the Law Enforcement Committee. He shares responsibility for providing training to stakeholders, and engaging necessary resources to support proactive investigations of all forms of trafficking, and ensuring that data is reported into PMT or according to procedures developed by the TF. He has been a member of the TF for 3 years, and provided leadership since June 2015.

Erin Kelly is the Program Manager for CFS’s Runaway and Homeless Youth Program. Her role on the Core team is to represent service providers. Her responsibilities include supervising case managers, ensuring that data is reported into TIMS or according to procedures developed by the TF, and co-leading the Services Committee. She has been a member of the TF for 3 years, and provided leadership since June 2015.

[redacted] represents Give Way to Freedom, and has been designated to be the Project
Purpose Area 1: Development of Human Trafficking Task Forces

Director. As part of the Core Team, she is responsible for convening meetings, providing support to all Committees as necessary, overseeing the work of the Evaluator, performing administrative tasks, and providing overall guidance and management for TF efforts in pursuit of the goal and objectives. She also co-leads the Training Committee. She has been a member of the TF for 3 years, provided informal leadership for 2 years and formal leadership since June 2015.

is the Resident Agent in Charge (RAC) and represents HSI. His role is to represent federal investigation interests. He supervises and supports investigations, and co-leads the Law Enforcement Committee. He shares responsibility for providing training to stakeholders, and engaging necessary resources to support proactive investigations of all forms of trafficking, and ensuring that data shared for PMT and TIMS according to procedures developed by the TF. He has been a member of the TF for 2 years, and provided leadership since November 2014.

an Assistant United States Attorney (AUSA) and represents the USAO. He is responsible for prosecuting federal cases, and engaging necessary resources to support proactive investigations of all forms of trafficking. He has worked with TF partners for 2 years, and is new to the leadership.

the Victim/Witness Coordinator at the USAO. Her role is to serve as a point of connection at USAO, provide the bridge between law enforcement and services, and co-lead the Victim Services Committee. Her responsibilities include working to ensure victims are connected to services, and helping engage necessary resources to support victims and victim service development. She has been part of the leadership group for two years.

**Activity 5.3: Identify and dedicate sufficient administrative staff:** As described above, the TF will hire a Project Director who will be responsible for the overall development of the TF and progress toward the goal and objectives. This includes, but is not limited to, guiding joint
development of training and outreach materials; performing administrative tasks including convening regular meetings, guiding the development and update of task force protocols, formalizing MOUs, and conducting outreach to expand task force membership; and collecting, sharing, and reporting task force data. The Project Director will also deliver trainings, and work with the Services Committee to build capacity for statewide services. She will be located at CFS, with workspace available at MPD and the ability to meet at HSI as necessary and required.

**Activity 5.2:** Ensure membership includes all essential agencies: The TF is multidisciplinary and diverse, and all members are vetted and will be asked to sign a Memorandum of Understanding (MOU) agreeing to adhere to TF policies and protocols, to be formalized within 90 days of any award. A full list of current members can be found in the draft Member MOU, Attachment 11. These include, but are not limited to: the USAO; the NH Attorney General’s Office (AGO); the Hillsborough County Attorney’s Offices; Nashua and Salem Police Departments; a cross section of service providers including youth service provider Child and Family Services (CFS); the International Institute of New Hampshire (IINH) which services immigrants and refugees; New Hampshire Legal Assistance; the Division of Children, Youth and Families (child welfare); the US Department of Labor, Wage and Hour Division (MOU pending) and Office of the Solicitor; victim/witness coordinators and advocates from the USAO, AGO, and HSI; the NH Episcopal Church (faith based); Elliot Hospital (MOU pending), and the NH Restaurant and Lodging Association (allied professionals). Throughout the 3 year project period we will identify and recruit new members based on identified gaps, capacity building state-wide, analysis of performance metrics, and results of the Evaluator’s efforts.

**Structurally** the TF operates with the leadership of the Core Team, 4 Standing Committees, and task-specific Project Groups. This structure was designed by Core Team partners USAO,
Give Way to Freedom (GWTF), and the AGO, after careful consideration of the successes and failures from the last three years and a keen eye toward what promotes active engagement.

The **Core Team** provides leadership and guidance to TF efforts. Its responsibilities include but are not limited to: developing strategy and identifying priorities based on data and feedback from the Advisory Committee and Evaluator; setting goals and creating accountability for timely actions for Committees and project groups; and approving media releases.

The **Advisory Committee** is comprised of select key stakeholders representing diverse agencies and fields, and membership is by invite only. Its purpose is to provide input on statewide efforts, including challenges, gaps, and best practices. Providing a common place for stakeholders to convene helps maintains harmonious working relationships across sectors.

The **Law Enforcement Committee** is comprised of local, state, and federal law enforcement; county, state, and federal prosecutors; and federal labor investigators. It serves as a central location to discuss and de-conflict cases; share intelligence and coordinate investigations; provide training and technical assistance to members and other jurisdictions; and help develop case protocols and data collection.

The **Victim Services Committee** serves as a hub where providers can discuss challenges, gaps, and best practices. Through these discussions the Committee helps the TF identify and prioritize where to build additional capacity, partners, and leverageable resources throughout the state. Once per quarter the Committee also offers professional development to all members.

The **Training & Community Engagement Committee** is open to any TF member and is comprised of law enforcement, services, and others. It is responsible for developing shared materials, establishing content standards, delivering training to stakeholders, and identifying additional trainers for topics outside of TF member expertise.
**Project Groups** are short term, task-specific collaborations to address specific policy, protocol and system/infrastructure building goals. They are an additional way for law enforcement and services to work together, and may be comprised of members from both the Law Enforcement and the Services Committees and in some cases non-TF members with specialized knowledge. We have found that this is the best way to facilitate collaboration as well as achieve results in a timely manner.

**Activity 5.4: Hold in-person task force meetings at least quarterly.** The TF currently meets once per month, and will continue to do so. Meetings are always the 4th Thursday of the month, in the same location. We open the space 1 hour before each meeting starts and invite any new members to come early for an orientation, or project groups to use the time and space for work. We have found that this setup encourages maximum participation, while simultaneously cutting down on the number of meetings and scheduling conflicts. Moving forward every third meeting will be devoted to Committee work. Twice per year we will dedicate at least 1 hour of the 2 hour meetings to professional development. See Attachment 7 Time to Task.

**Activity 5.5: Develop and update operational protocols that outline roles and responsibilities of members and the collaborative work of the TF.** The TF has identified, and will develop, the following protocols to formalize, describe, clarify, and/or guide our efforts: Roles and responsibilities of law enforcement and services responding to incidents; referrals to and from law enforcement and services; responding to emergencies and after-hours referrals; information sharing including confidentiality and informed consent; collection, sharing, analyzing and jointly reporting data; using culturally and linguistically appropriate victim-centered and trauma-informed approaches during investigations and the delivery of services, including identifying, screening, and interviewing victims; victim rights and protections including: requests for
Continued Presence (CP) or other documents needed to support immigration relief, and coordination of services with victim assistance professionals in law enforcement or prosecutors’ offices; handling cases with large numbers of victims; investigative and prosecutorial protocols; working with the media; TF membership; training/outreach standards to ensure all forms of trafficking and all victims are addressed; fundraising to support goals and priorities.

Development of the protocols will be a collaborative effort under the direction of the Project Director. We will convene Project Groups to research and develop one or more of the listed topics. Each draft protocol will be reviewed by the Services Committee, Law Enforcement Committee, and Core Team. Each of the listed protocols will have a written draft by the end of year 2 at the latest. In years two and three we will review and refine each protocol. Additional protocols will be developed as needed, based on member feedback and experiences.

**Open awards:** Although not the direct grantee, MPD is part of the Internet Crimes Against Children Task Force and receives funds from that grant in the form of overtime reimbursement. CFS has no open awards of any funding related to investigating, prosecuting, or providing services for victims of human trafficking.

**CAPABILITIES AND COMPETENCIES:**

*Experience and administrative or financial capacity to manage federal grants:*

**Manchester Police Department:** The City of Manchester, New Hampshire has an extensive financial accounting system, which is capable of keeping individual grants separate from each other as well as separate from general funds. Procedures are in place to ensure this separation of accounts. An independent audit is performed annually. A portion of the audit was designed to meet the requirements of the federal Single Audit Act and related OMB Circular 133. All funds awarded under this program will be accounted for separately and distinctly from all other sources.
of revenue/funding. Written accounting policies and procedures are in place. The financial management system is capable of tracking actual expenses and outlays with budgeted amounts. Each grant is setup as an individual project, which includes budget, expenses, outlays and funds received for reimbursement. Internal controls are in place to ensure that all grant expenses are solely for authorized purposes. In addition, a quarterly budget status report is generated for the individuals responsible for administrative and programmatic functions of the grant.

**Child and Family Services** has managed federal grants since 1972, and has the demonstrated capacity to oversee federal grants. All federal reviews and site visits have been successful. Examples of grants received include in 2009, an American Recovery and Reinvestment Act to provide homeless prevention; and ACF grants for: Street Outreach, Manchester (since 1996); Street Outreach, Seacoast (since 2012); Transitional Living Program (since 1993); and specialized TLP for pregnant and parenting (since 2002).

**Fiscal controls** are demonstrated through their financial management system, which assures that positive financial outcomes are achieved through the receipt, disbursement, and accounting of funds consistent with sound financial practices. Accounting policies and procedures are in place to guide staff members who handle all financial matters including proper financial management practices, cash management, month-end processing and reporting, purchasing and property control, processing cash disbursements, grant contracting, and payroll.

Financial statements are prepared monthly and audited annually. CFS has no outstanding findings in its audit and conforms to all state and federal accounting practices including OMB A-133. CFS uses Blackbaud’s **Financial Edge** fund accounting software - an accounting management information system that establishes separate income and expenditure “cost centers” for each CFS service division on a monthly basis, creating accurate fiscal monitoring and
program management. Each month, income and expense statements (profit/loss) with budget
comparison are prepared for each cost center and monitored by the Program Directors, CFO,
CEO and COO. Statements are used to prepare reports required by funders.

Key staff responsible for management and implementation:

**Manchester Police Department** will be represented by:

**Sergeant** will provide supervisory support. He has been a member of the
Manchester Police Department for over 17 years. He has been a Sergeant for over 7 years and
has been assigned as the Domestic and Sexual Assault Unit Supervisor for over two years. He
has received specialized training on human trafficking investigations, and investigated more than
10 human trafficking cases. Through his work he has extensive experience working with victims
of crime and employing victim-centered and trauma-informed techniques.

**Investigator:** A full time investigator will be assigned. The investigator will have experience
investigating human trafficking, and training in trauma-informed practices.

**Business Service Officer**, is the AOR and Financial POC for this project, and
has the financial responsibility for this grant.

**Child and Family Services NH Key Staff**

**MSW**, is the Chief Operating Officer for CFSNH. Maria has more than 25
years of leadership experience in the non-profit sector with demonstrated success in agency
operations, fundraising, talent management and strategic planning. Her work has been
focused on the most vulnerable populations in NH.

**MA, LCMHC**, is the Program Manager for the Runaway and Homeless Youth
Program at CFS. She has over ten years of experience in human services, focusing
primarily on adolescent and family services. She joined CFSNH in 2006 to focus on enhancing
the well-being of children and families. In 2008, she transitioned into runaway and homeless youth services, and currently oversees a continuum of runaway and homeless youth services that covers more than 15 NH communities. Through her experience working with runaway and homeless youth, she has encountered and worked with many victims of trafficking.

**Intensive Case Managers:** To be hired. Successful candidates will ideally have experience providing case management to victims of trafficking, but at minimum 1) hold a Bachelor’s Degree in Social Work or related field with three years of experience working with vulnerable populations; 2) have experience using a trauma informed approach; and 3) demonstrated success in working with community-based service providers. Additional qualifications are listed in the Job Description, Attachment 10. The ICM will provide case management for all victims in NH, and be supervised by [supervisor] with support from the Project Director Erin Albright. Between the two they have experience working with all victims, all ages, all nationalities.

Chief Financial Officer, has his BS in Business Administration from the University of New Hampshire. Since 1987 he has served in a range of general manager, controller, director of finance, and chief financial officer positions, brings over 25 years of experience that includes the management of operations for large nonprofit organizations, preparing, managing, and overseeing state, federal and other contracts.

**Give Way to Freedom: Erin Albright,** Esq. is the Regional Program Director at Give Way to Freedom, and will be the Task Force Project Director. She has worked in the anti-trafficking field for over 8 years, in law enforcement and services. For 2.5 years she managed all data for the Boston Police Department’s Human Trafficking Unit, and the Massachusetts Trafficking Task Force. From 2011-2015 she managed TVAP for New England, including providing comprehensive, culturally appropriate and trauma-informed case management to foreign national
victims, overseeing the development of a network of service providers to do the same, and
working closely with law enforcement and attorneys to strengthen supports for survivors. For the
last 5 years she has also worked closely with Task Forces to build collaboration and capacity.

See Attachment 10 for Key Position descriptions and resumes

Experience and expertise of key victim service partners: (see also Attachment 4)

**Child and Family Services of NH** provides an array of services to vulnerable individuals
including: mental health counseling; runaway and homeless youth services; eldercare;
transitional and independent living; foster care; family counseling; adolescent substance abuse
treatment; in-school social work; after-school programs for adjudicated youth; pregnancy
counseling and prenatal supports & services. In addition, CFS has trained staff to meet the needs
of lesbian, gay, bisexual, transgender and questioning youth through our street outreach,
counseling and housing programs. With 14 office sites, CFS delivers 28 programs across the
state--addressing human need at every age and stage of life--to an average of 21,000 children,
youth and families, annually. Through its multiple programs serving vulnerable populations, CFS
has served many trafficking victims. Although CFS has only recently begun to include
trafficking in data collection, anecdotal evidence shows that this is true. Moreover CFS services
employ a strength-based, client-centered, trauma-informed approach that is consistent with best
practice for providing services to victims of human trafficking.

The **YWCA** and **Crisis Center Central New Hampshire** provide support to domestic and
sexual violence survivors in Hillsborough, Rockingham, Merrimack counties. As such, and given
the lack of dedicated trafficking services in those areas, they have received referrals for, and
provided services to, trafficking victims for many years. Victims have been both U.S. Citizens
and foreign nationals, and they have served both sex and labor victims. For example in 2014 the
YWCA provided advocacy and shelter for a foreign national labor trafficking victim while she pursued certification and immigration relief.

**International Institute of New England/New Hampshire**: Through a 2011 sub-grant from HHS, IIEN became the New England Regional Service Coordinator for the HHS/ORR TVAP Program (TVAP) program, responsible for establishing and managing a network of qualified, subcontracted service providers throughout the region that provide comprehensive case management to foreign national victims of trafficking. In 2015 the program stepped away from regional coordination, and now focuses on providing comprehensive case management. Staff has been trained in identifying trafficking and using victim-centered and trauma-informed practices.

**New Hampshire Legal Assistance**: Through its employee Chris Wellington, Esq., Director of Fair Housing Project, NHLA has provided legal services to trafficking victims including immigration, benefits, fair housing, and family law matters. She has successfully represented six foreign national victims in NH in applying for T-visas, and many other victims in applying for U-visas. She has worked with trafficking victims – both sex and labor, male and female – for over four years, first at Catholic Charities and now at NHLA.

**Plan for supervising case managers and direct service staff**: Case managers and other direct service staff supported by the project will be supervised by, [name redacted] weekly, alternating between individual meetings and group meetings. They also have access to agency supervisors 24/7 days a week, and the Project Director will provide technical assistance as necessary.

**Plan that describes how those coming in contact with minors will be screened**: For all direct service staff and others, including volunteers, coming into contact with minors, CFS or one of the law enforcement partners will perform a criminal background check, a driving record check, and a query check with DCYF to identify any history of child abuse and/or neglect.
Plan for Conducting Proactive and Long Term Investigations

Manchester PD, in collaboration with lead federal investigation partner Homeland Security Investigations, the United States Attorney’s Office, and members of the Law Enforcement Committee (LE Committee) including NH State Police, Nashua, Salem, Hampton, and Portsmouth PDs, the Attorney General’s Office, the Hillsborough County Attorney’s Office, and the Department of Labor Wage and Hour Division, will conduct proactive activities with the intent to increase the identification of cases and victims, investigations, and prosecutions of both sex and labor trafficking within the state of NH.

The law enforcement team will be anchored at the local and state level by Manchester Police Department through a full-time dedicated MPD Detective, Sergeant [redacted], will have supervisory responsibilities, and 6 current detectives will contribute an average of 5 hours a week in order to investigate cases statewide. The assigned Detectives will exercise primary jurisdiction over applicable state laws, and HSI Special Agents will exercise jurisdiction over federal law. Jurisdiction will not be a problem, as state law allows for any law enforcement officer to make arrests state-wide, and the detectives will seek deputization in each NH county. Deputization will allow both local and federal law enforcement officers to exercise arrest authority for state offenses, state-wide. This is a common scenario throughout NH, given the number of small and rural police departments that lack the capacity for more complex investigations. Additionally, the New Hampshire State Police (NHSP) will participate in order to further ensure state-wide jurisdiction. Finally, HSI will train and certify key law enforcement personnel to be federal task force officers (TFO). TFO credentials will authorize the law enforcement officer to enforce federal law outside of New Hampshire, when necessary.

The assigned Detective will be partnered with HSI Special Agents, as well as Detectives
investigators from the Department of Labor Wage and Hour Division (DOL WHD), prosecutors, and victim-witness coordinators as necessary to establish a law enforcement team for each case. Further, the law enforcement team will be equipped with computer forensic support provided by HSI and the NH Internet Crimes Against Children's Task Force. Collectively, all of these partners comprise the Law Enforcement Committee (LE Committee), which serves as a central location to discuss and de-conflict cases; share intelligence and coordinate investigations; provide training and technical assistance to members and other jurisdictions; and help develop case protocols and data collection. The LE Committee is led by Manchester Police Department, the USAO, and ICE/HSI, and will meet on a quarterly basis.

The LE Committee will develop proactive and long-term investigations by targeting areas throughout New Hampshire that are at risk for human trafficking activity. It will begin with a comprehensive, state-wide threat assessment for both sex and labor trafficking. Directed by the results of the threat assessment as well as historical and other data, it will utilize a variety of investigative techniques, from undercover operations to overt techniques to combat the issue. Further, law enforcement will utilize its broad array of investigative authorities, from drug trafficking investigations to financial investigations to labor investigators, to target those who facilitate, or benefit from human trafficking activity.

For sex trafficking we will target areas in which commercial sex activity and drug trafficking are common, as identified by the threat assessment, in order to develop long-term, proactive investigations. For labor trafficking we target areas of vulnerability identified by the threat assessment, and will work with DOL WHD and recruit other labor and code compliance inspectors who have more access to vulnerable labor environments and, with training, better
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The LE Committee will coordinate all efforts, and engage in aggressive outreach and education to increase awareness of human trafficking in NH. The information received both from the law enforcement and multidisciplinary partners, as well as from the general public, will improve as a result. These sources of information will lead to additional long-term, proactive investigations. Specific initiatives include:

A. **Targeted outreach/awareness/training initiatives:** The TF and LE Committee have a five part plan for targeted training and outreach for law enforcement and investigators, designed to increase the identification of cases and victims, investigations and prosecutions of both sex and labor trafficking.

First, in Year 1 we will seek to incorporate human trafficking, sex and labor, in the academy curriculum. We will do this by adapting our existing basic training (see Attachment 5) for a law enforcement audience, and then by working with Police Standards and Training to incorporate it in the academy curriculum. By doing this we will ensure that future officers all have at least a basic ability to identify potential cases of both sex and labor trafficking.

Second, we will engage and provide basic training to police departments throughout the state. On any given day law enforcement in NH encounters potential human trafficking victims while not necessarily pursuing human trafficking leads. In a typical situation, law enforcement may encounter these individuals during the course of investigating, or responding to other incidents such as drug trafficking, or motor vehicle violations. Although the Manchester Police
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Departments maintains a Detective Unit dedicated to investigating trafficking, the referral and handling of potential human trafficking situations is, at times, disjointed. Trainings will target not only those law enforcement officers that investigate human trafficking, but those that investigate other offenses, and those who may encounter human trafficking through their regular course of duty such as at traffic stops. The LE Committee will prioritize audiences/jurisdictions based on the results of our threat assessment, historical case locations, and the results of our Baseline survey (See Attachment 2, Project Narrative and Attachment 5, Training Plan). By increasing human trafficking awareness throughout NH law enforcement, better intelligence will be shared with those dedicated to investigating human trafficking.

Third, we will continue to build the capacity of our LE Committee to stand as a team of investigators with advanced skills that can act as points of contact for their respective jurisdictions, and/or provide technical assistance and investigative support to other jurisdictions. We will do this by 1) inviting agencies that have received the basic level training to participate in the LE Committee, and 2) providing professional development training to LE Committee members. Advanced level professional development training targeting the LE Committee will occur at least semiannually, and will include trauma informed interviewing, psychology of addiction, case studies from successful cases that were investigated both locally and out-of-area, as well as best practices that enhance investigations and prosecutions of labor and sex trafficking. The existence of this team to support investigations is especially important for our statewide approach, as many of the smaller jurisdictions do not have capacity to actively participate in the LE Committee or investigate cases.

Fourth, the LE Committee, through member DOL WHD, will enhance our outreach to labor investigators at the state level and others in positions to identify instances of labor trafficking.
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Through these targeted outreach and training efforts, the LE Committee will increase awareness within the law enforcement community. This will help us engage in proactive and long term investigations because increased awareness will breed better investigative referrals, and will further develop expertise amongst the law enforcement community.

B. The development of new partnerships and information sharing initiatives with federal, state, local and tribal agencies

Through the targeted outreach and training described above, the TF will develop new partnerships and information sharing initiatives to enable and support proactive investigations. Agencies that join the LE Committee will be asked to sign an MOU that includes basic provisions on information sharing, and adhere to any information sharing policies and protocols developed by the TF. The LE Committee will continue to meet quarterly, providing a forum for partners to share information. These meetings will include sharing data and analysis from PMT. In addition, anticipating that resources might prevent some police departments from active engagement, the LE Committee will serve as a point of contact for information sharing, investigative assistance and technical support.

We will also devote specific attention to two areas of critical partnerships. First, by developing new partnerships and information sharing initiatives with federal, state, and local labor investigators and stakeholders. In October 2015 we established a new partnership with DOL WHD, and in December 2015 we trained all of their investigators for New England on identification of trafficking. WHD is now a member of the Task Force, and will assist in
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outreach to establish partnerships and information sharing activities with local and state level

investigators and stakeholders, thereby building capacity to ensure labor receives equal

identification and attention as sex trafficking. The Law Enforcement partners in the Core Team,

the Project Director, and the representatives from WHD will work together to establish

information sharing protocols that align with TF objectives but preserve each agency’s mandate.

Second, with the opiate epidemic, we are seeing a substantial number of cases involving

heroin as the means of coercion. In one case, the trafficker stood by holding a bag of heroin

while the victim was vomiting in the trash can, and told her she could only have it if she got back

to work. We will work with the DEA and drug units to provide training and share information so

that they can identify potential trafficking during the course of their investigations, and refer

such instances to the LE Committee or appropriate person within their Police Department.

Finally, understanding that an effective approach includes collaborations outside of law

enforcement, Manchester PD, HSI, the USAO and the LE Committee will work with the

Services Committee and multidisciplinary partners to address drug addiction and mental illness

associated with human trafficking. This approach will not only put the immediate needs of the

victim first, but will cultivate reliable and cooperative witnesses to further the investigation. This

will also extend to developing relationships and partnerships with allied professionals poised to

identify labor trafficking including the Restaurant and Lodging Association and its members.

The development of additional partnerships will increase both the volume and quality of

investigative referrals. Moreover, it will enable law enforcement to utilize a wider variety of

investigative resources to combat human trafficking. This will help us engage in proactive and

long term investigations because we will be able to leverage the intelligence and expertise that is

being collected through other types of investigations, to include drug trafficking and
C. Through the improvement and sustainment of investigative & intelligence gathering methods. In this area the Task Force will do three things:

First, we will provide professional development training designed to improve investigative techniques, as described above. The long term result will be a core group of advanced investigators across the state that can act as point person for their respective jurisdictions, and/or provide technical assistance and investigative support to other law enforcement.

Second, establish a coordinated intelligence effort by developing a partnership with the NH Information and Analysis Center (NHIAC) as a clearinghouse for intelligence. The NHIAC is a New Hampshire State Police (NHSP) led initiative. Through NHSP participation on the LE Committee, the NHIAC is already being consulted to further human trafficking investigations in NH. Law enforcement is coordinating with the NHIAC to discuss ways to distribute human trafficking intelligence. One example is the development of intelligence notes for state-wide distribution. To date, three such intelligence notes have been distributed. Efforts such as this will help both improve and sustain intelligence gathering.

Third, through data-driven self-assessments including case debriefs at quarterly LE Committee meetings to identify successful and unsuccessful strategies; data collection, analysis and sharing with law enforcement partners; and working with the Evaluator to incorporate investigation-related questions into the annual evaluation efforts. The information from all of these efforts will be used to identify gaps and areas for improvement, which the TF will then take steps to address through trainings, new or amended protocols, and other appropriate actions.

The LE Committee, to include the NHIAC, will meet quarterly in order to discuss case progression, as well as to develop new intelligence streams. This will help us engage in proactive
D. **Improvement of info sharing protocols with victim service providers**

At present, the Task Force provides a forum for victim services providers and law enforcement to share information on a monthly basis. These relationships and processes will be further formalized in the following ways should this grant be awarded to the NH Task Force.

The leadership of the LE Committee will work with the Project Director and Service Provider lead to create a formal information sharing policy and protocol applicable to all Task Force efforts. This document will address issues including, but not limited to, professional and legal responsibilities related to confidentiality and information sharing; handling tips made to task force members; referrals to and from service providers; what type of information is appropriate for open sharing and what is not; and a method for conflict resolution. As part of the process of improvement the TF will discuss and clarify roles, expectations, and challenges, and we will continue to look to the OVC e-guide for tips as to best practices and strategies other Task Forces have used to guide information sharing between members. In addition we will hold regular Case Review meetings separate from Task Force meetings, for only those actively involved in a particular case. We will develop a specific protocol for these meetings.

Consultation and coordination between the LE Committee, and the victim service providers is essential to creating a victim-centered, trauma informed environment. Human Trafficking investigations can only be successful with stable and reliable victims. In order to attain these types of witnesses, law enforcement must work closely with victim service providers. This will help us engage in proactive and long term investigations because it will facilitate victim cooperation with law enforcement.
E. **Enhancement of prosecution strategies through a two pronged effort**

In New Hampshire, human trafficking cases are currently being prosecuted in a vertical manner. Law enforcement involves the prosecuting agencies, whether that be the USAO or the County Attorney, during the early stages of the investigation in order to develop a methodical and coherent investigative work plan. We will enhance this first through continued collaboration with prosecution offices, increased prosecutor participation in the LE Committee, and prosecution-specific case reviews/debriefs on at least a semi-annual basis that discuss pros, cons, challenges, and strategies.

Second, we will enhance prosecution strategies through more training and connecting with expertise nationally. Training will help local and state prosecutors identify human trafficking and prosecution techniques. Included in this will be recognition of a point person for each prosecutor’s office to whom cases and potential cases can be referred to ensure that cases do not move through the legal system unidentified. We will look to the DOJ Human Trafficking Prosecution Unit, other Task Forces and other prosecutorial training resources such as Aequitas for expertise and training support.

F. **Implementation of trauma-informed victim interaction and interviewing practices**

Reliable and stable witnesses are crucial to a successful Human Trafficking investigation. Victims and other witnesses are typically apprehensive about cooperating with a law enforcement investigation. Understanding trauma that the victim has previously experienced will help the investigator build rapport in order to cultivate cooperative and trustworthy witnesses. To that end, the LE Committee will focus training efforts to address the importance of a trauma-informed approach. It will leverage local expertise that has been developed during human trafficking investigations combined with service provider expertise from the many service
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provider partner that have expertise on trauma-informed practices. Further, the LE Committee will host an HSI Forensic Interviewer to train law enforcement.

It will also work with the Project Director and Service Committee to draft and issue investigative guidelines that outline best practices in which to engage when investigating human trafficking. Those guidelines will focus heavily on the importance of a trauma-informed approach.

The implementation of trauma-informed victim interaction and interviewing practices will increase the number proactive and long term investigations. These practices will enable the investigator to develop more reliable and stable witnesses to support the criminal prosecution.
Plan for Delivery of Comprehensive Services for all Victims

The Task Force, through the service provider partners, uses a coordinated, community-wide response (CCR). By using a CCR we are able to best leverage a variety of local, state, and federal resources. The CCR is anchored in Hillsborough County, the largest county in the state. It currently extends into two of the adjacent counties – Rockingham and Merrimack. Because services are not necessarily constrained by county lines, and because victims often move depending on available shelters, safety concerns, and/or service needs, the partners across these 3 counties are able to provide a comprehensive array of services for sex and labor victims of all ages, sexes, foreign nationals and U.S. citizens. For the purposes of demonstrating a comprehensive array of services, and in consideration of page limits, this plan focuses on the services in Hillsborough County and, for key services, Rockingham and Merrimack Counties.

Funding is necessary because although we can provide an array of services in those three counties, and we have the interest and commitment of many service providers across the state, we still face the fundamental issue of no dedicated programming or staff. This means that victims are often navigating the system on their own and when they do access services it is through programs not designed for, and thus not fully familiar with, their service needs. Referrals from stakeholder end up scattered across a range of agencies, most of which lack capacity, and in some case are ill suited to support survivors. In one case, undocumented survivors were referred to a community agency with no experience working with trafficking victims. This agency organized a public march on behalf of the victims that ended at the business place of the perpetrators. Even case managers with experience working with trafficking victims often lack the time to engage and develop the necessary connections and provide training that would build capacity. The need for services must to be matched by enhanced capacity that comes from
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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims
dedicated staff to assure that referrals, system coordination, and training happen purposely,
ensuring fidelity to trauma-informed systems of care.

Results from our Baseline Survey (See Attachment 2, Project Narrative) indicated that 52% of professional stakeholders across the state were unaware of resources to support victims of trafficking. 28% knew of some resources, and only 20% of the 416 respondents indicated a stronger knowledge of resources available for victims. This supports the need for dedicated staff, as efforts to resolve this by identifying additional partners, formalizing a referral process, developing protocols and gathering data to inform our efforts have repeatedly been stymied by the fact that no agency or person has the ability to dedicate enough time to manage such projects.

Thus funding for this project will allow us to formalize and enhance our existing partnerships in Hillsborough, Rockingham, and Merrimack Counties, and build capacity in the rest of the state through the efforts of dedicated staff. It will support a full time Project Director, who will work alongside all members to build statewide capacity through the identification of new partners and resources, stakeholder trainings, protocol development, and data collection and evaluation. It will enable us to hire two full time Intensive Case Managers (ICMs) that can provide intensive case management to all survivors, act as points for referrals, and engage in outreach to existing and new partners to identify additional resources alongside the Project Director and other members.

CFS as the lead: Child and Family Services of New Hampshire (CFS) is the applicant and lead service provider for the TF. CFS is a nonprofit organization, founded in 1850, that currently aids more than 14,000 individuals, statewide, through 28 programs and 16 office sites. Its statewide presence, lengthy history of providing services to diverse populations vulnerable to trafficking (including runaway and homeless youth, families, eldercare, and adults with
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The two ICMs will be employed by CFS, and located in Hillsborough and Rockingham Counties.

**The Task Force Services Committee supports the CCR.** Continued development of the CCR is shared by CFS, the Services Committee and Project Director. The Committee is led by Core Team members from CFS, and Victim Witness Coordinator at the USAO. Committee membership is comprised of agencies that provide direct services within the CCR, umbrella organizations that represent groups of direct service providers that are part of the CCR, and agencies that would like to build their capacity to provide direct services to victims.

**Plans to build out the CCR:** With the benefit of dedicated staff, including the Project Director to devote time and management of efforts, the Task Force will engage in a resource and service mapping project to build out the CCR. As described below, we have a strong and comprehensive array of services in across Hillsborough, Rockingham, and Merrimack Counties. As demonstrated in the MOUs, we also have several committed partners outside of those counties, and as described above we intend to enhance those existing services and build capacity to provide a comprehensive array of services statewide. The mapping project will identify services, assess capacity and experience working with trafficking victims, and identify agencies that need/want training in order to work with, or improve their work with, trafficking victims across the state. This project will continue throughout the 3 year project period, with the goal of maximizing resources and leveraging existing supports. In addition to the Project Director’s time, ICMs will contribute to this project as they identify new resources through their regular case management efforts, and other TF members will also contribute time and knowledge.

**Services for all victims:** The existing CCR provides services to all victims – male, female,
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citizen and foreign national, sex and labor victims, adults, minors and LGBTQ. Unless otherwise
noted, all services below work with all populations. See Attachment 13, MOUS with Victim
Service Partners for more information on victims eligible for each service.

**Experience of Key Service Partners** (continued from Project Narrative): Many service
provider partners that comprise the CCR have no documented experience working with
trafficking survivors. What service provider partners do have is a wealth of experience providing
high quality services to other vulnerable populations such as runaway and homeless youth,
domestic violence survivors, individuals with substance use disorders, and immigrant
populations. And while we know that the needs of such populations can different – at times
radically so – our service provider partners have recognized the need and are committed to
working together to adapt and build capacity to provide services to all trafficking survivors. A
prime example of this dedication are the Child Advocacy Centers (CACs). Traditionally they
serve only children, but recognizing the needs of trafficking victims have begun to provide
forensic interviews to adult trafficking victims. Another example is Elliot hospital. Recently we
had a case where a victim was about to be discharged from medical detox, when at the last
minute the residential program to which she was going had to postpone her enrollment. Through
the efforts of the HSI Victim Assistance Specialist and Give Way to Freedom we identified two
other programs that agreed to make space available for the interim period, despite the fact that
such actions did not follow their established procedures. Ultimately the staff at Elliot stepped
forward and offered to allow the victim to remain there. Given the choice, the victim chose to
remain Elliot. This demonstrates the willingness of partners to adapt and provide support. In
order to realize the potential therein, the commitments and interest must to be matched by the
enhanced capacity that comes from dedicated staff to assure that referrals, system coordination,
Other funding: Currently there are no other OVC funded trafficking services in NH. The only trafficking-specific funding from either the state or federal level is through the HHS/ORR TVAP program, and is exclusively for non-citizen, non-Legal Permanent Resident (LPR) victims seeking certification. In accord with OVC and ORR policies, all pre-certified victims will receive services from the OVC funded program, and be transferred to the ORR funded program upon receipt of certification. CCR member IINH has an MOU with TVAP grantee U.S. Committee for Refugees and Immigrants (USCRI) to provide comprehensive case management under the TVAP program. The Project Director will provide training and technical assistance on the transition and differences between the 2 programs to ensure no duplication of funds.

Non-trafficking funding: Other non-trafficking specific state and federal funds will be used, in whole or in part, to provide services. This funding includes, but is not limited to, state funding through the Department of Health and Human Services to provide intensive home based counseling, respite and foster care and mental health and substance abuse treatment for victims and their families. Funding through the Federal Family and Youth Services Bureau can provide transitional living and case management services for young adults ages 18-21. Additional details are provided as relevant below.

SERVICE DELIVERY

Comprehensive service model: We will employ a victim-centered and trauma-informed Comprehensive Service model, grounded in intensive case management and individualized service plans that are tailored to meet victims’ identified needs. The model prioritizes victim safety and stability, leading to the goal of autonomy and economic self-sufficiency. Our CCR is a collaboration that brings together existing community resources and initiatives to ensure a
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A comprehensive array of services for victims and maximize resources. Many of the services are available at no cost, or through insurance to survivors of trafficking. Funds from this grant will be used to hire 2 full time ICMs, which the TF has identified as the critical gap in services statewide, as well as other gaps in the existing services in the short-term aftermath of victim identification, until the victim is able to access other federal, state or local programs for which they may be eligible.

**Intake/eligibility assessment** will be provided by OVC funded ICMs at CFS. All referred cases will go through an intake and eligibility assessment. The intake will be the existing CFS intake, adapted it to include any information required by TIMS that is not part of the existing intake, as well as questions that screen for trafficking because we know that not all cases arise via referral and most victims do not self-identify. The screening questions will help identify whether someone has been subjected to a form of severe trafficking in persons, as defined by federal law, 22 U.S.C. § 7102(9), and is thus eligible for the program. All CFS intake staff, as well as service provider partners and TF members will receive training on this definition. All victims will be encouraged to report to and assist law enforcement. Per current OVC rules, adult victims will be required to cooperate with reasonable requests from law enforcement on the investigation or prosecution of trafficking in persons. We will work closely with Manchester Police Department (MPD) and the Law Enforcement Committee to create a process that is trauma-informed and does not negatively impact or re-traumatize victims. Where we have concerns about such consequences we will seek an exception from OVC. Minors will be encouraged, but not required, to assist law enforcement.

**Intensive case management** will be provided by OVC funded ICMs at CFS for all victims – sex, labor, male, female, adult, youth, U.S. citizen and pre-certified foreign nationals, regardless
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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims of where they reside. Once undocumented foreign nationals receive certification, they will be referred to partner IINH to enroll in TVAP case management. Included in intensive case management are: (1) assessment of client needs; (2) development of Individualized Service Plans (ISPs); (3) assessment of eligibility for other public or community-based programs; (4) assistance in accessing publicly funded programs; (5) safety planning; (6) assistance with crime victim compensation claims when possible; (7) information and referral; (8) documentation of services provided; and routine follow-up to ensure that the victim’s needs are being addressed, either in-house or through project and community partners.

Intensive case management will be embedded in the Manchester (Hillsborough) and Portsmouth (Rockingham) CFS sites, but delivered statewide as necessary through CFS’s other sites. These 2 locations were chosen because they are large cities within the 2 biggest counties, where over 50% of victims have been identified. The two ICMs will provide a single point of contact and coordination for survivor services and referrals. CFS will bring together the experience and expertise of its other services for vulnerable populations, including runaway and homeless youth, families, eldercare, and adults with disabilities, to ensure access to robust and high-quality “wraparound services” that meet victims where they are and helps to express their choices while working through the trauma of the situation and interacting with the necessary local and federal partners. CFS and the Project Director will also provide training and professional development to CFS staff and other interested stakeholders state-wide to build capacity for intensive case management and working with trafficking victims.

The core of intensive case management will be the individualized service plan (ISP). Using the intake/needs assessment as a starting point, ICMs and victims will work together to develop an ISP which readily identifies survivor goals, action steps, and timelines towards goal.
The plan for shelter and housing includes access to a variety of emergency and transitional shelters, and group and independent living options. Partners for housing are located statewide, as we often encounter safety or other concerns for victim remaining in the county in which the crime occurred. Victims will continue to receive intensive case management from one of the two ICMs regardless of their location, and ICMs will be able to receive support in identifying local resources from the CFS site closest to the shelter location, as well as other members of the TF and CCR. The project will leverage the availability of other trafficking-specific group and transitional shelters in the New England region as necessary and available. For example, clients may be given the option of relocating to a shelter outside of Boston if space allows. Specific shelter and housing supports include:

**Emergency housing** in Hillsborough will be provided for adult women by the YWCA at no cost to the grant, and by **Families in Transition** for all adults. In Rockingham, **Cross Roads, Inc. (Cross Roads)** will provide emergency shelter to men, women, and families at no cost to the grant. In Merrimack, the **Crisis Center of Central NH** will provide emergency housing for all victims at no cost to the grant. In some instances, including male victims, this may include several nights at a hotel, with the cost covered by VOCA emergency funds, thus at no cost to the grant.
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grant. For more information on the services provided by these partners see Attachment 13, MOUS with Victim Service Partners.

**Transitional housing** will be provided in-house at CFS and through MOUs with partners as follows: For youth under 18, at no cost to the grant through CFS existing MOUs with several residential facilities and licensed foster homes including: Chase Home, Dover Children’s Home, Spaulding Youth Center, NFI and Webster House. For youth 18-21, through CFS Transitional Living Program in Hillsborough, Rockingham/Strafford, Merrimack and Grafton counties, at no cost to the grant. This is a 12-18 month program that provides supportive housing, life skills training and support services to young people who are homeless or transitioning out of foster care. The program is designed to promote self-sufficiency and reduce the risk of future homelessness. Funding is provided through a variety of sources including: Administration for Children and Families (ACYF/FYSB), HUD, NH DHHS and charitable awards.

**Cross Roads** will provide transitional living support to men, women, and families in Rockingham and Strafford Counties at no cost to the grant. **Families in Transition** will provide transitional living support in the form of affordable housing and support services in Hillsborough, Merrimack, and Rockingham counties and for all adult victims except those that are undocumented. The ICMs will work with immigration attorneys and the Project Director to pursue Continued Presence for any undocumented victim. but can also refer victims to Cross Roads in the event that immigration status is a barrier. The cost to participants at Families in Transition is 30% of their income.

**Group and independent housing:** YWCA will provide independent living support for women support for women and men over 18 in Hillsborough and Rockingham Counties at no cost to the grant. **Crisis Center of Central NH** provides group living housing to adult women in
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Merrimack County at no cost to the grant. For foreign national survivors, the International Institute of New Hampshire has relationships with several landlords in Manchester and Nashua and can help find appropriate apartments for victims. ICMs will help all eligible victims apply for rental and other housing assistance.

We have allocated $135,000, or $45,000 per year, to provide housing support – including transitional housing and independent living – over the 3 year project period. This includes 2 months rent and security deposit for 20 victims, at the local rental rate in Manchester. This will provide victims with immediate access to safe housing while case managers work with local housing agencies to provide permanent housing to victims. Where possible, such as once the victim is employed the cost will be shared by the victim as part of the transition to independence. Not all victims will need such support, and some may not need the full amount.

*Sustenance and other basic needs* will be provided through an array of food pantries, public benefits, and donations. ICMs will help victims apply for SNAP benefits. CFS runs a drop-in center in Hillsborough that provides food. Task Force member Episcopal Church of New Hampshire has congregations statewide that operate food banks. Several of our partners also provide sustenance support, as documented in their MOUs. See Attachment 13. In addition, we have allocated $3,000 per year for sustenance, calculated at $100 each for 30 clients, for a total of $9,000 over a three year period. This will provide victims with immediate access to necessary items while case managers work to connect them with local food pantries and other resources within the community as needed.

*Medical:* Emergency and urgent medical issues will be handled by taking the victim to the closest emergency room or urgent care center. For all other medical care, ICMs will make referrals based on the victim’s location and circumstances, such as insurance considerations.
ICMs will work with victims to enroll them in state sponsored health insurance plans or connect them with local health clinics and mental health centers.

Partners for medical care include: in Hillsborough, Manchester Community Health Center will provide high quality, comprehensive, family-oriented primary health care services to meet the needs of a diverse community regardless of age, ethnicity, or income. Costs for these services are covered by insurance, at no cost to the grant. In Rockingham, Families First will provide integrated office based medical and dental services, pregnancy counseling and reproductive health and STI services to all victims. These services will be covered by insurance for most victims, and on a sliding scale for uninsured victims.

In Merrimack, partner Crisis Center of Central NH has a long history of collaborating with Concord Family Health (CFH) to meet the needs of victims of domestic and sexual violence and human trafficking. CFH provides comprehensive primary, preventive, behavioral health and dental care to uninsured, patients with mental illness or social stresses, people living in poverty and refugees, and women in need of reproductive health care. All services are provided regardless of ability to pay, with financial counselors on-site to assist patients with applying for financial assistance and Medicaid. ICMs will refer victims in Merrimack County to Concord Family Health, and we will reach out to include them via MOU in our CCR.

We have allocated a 3 year total of $15,000 for healthcare related expenses including medical care, mental health care, dental care and substance abuse treatment. These services are paid for by insurance for most victims, and most costs are fully covered by insurance. The allocation of funds is for uninsured clients and medical expenses not covered by health insurance such as: co-pays, deductibles, and dental care. This will provide victims with immediate access to health care while case managers work to connect them to state sponsored health insurance.
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plans or local health clinics and mental health centers. This allocation will also cover sliding scale fees. Because most victims are unemployed or in low wage jobs, and with the expansion of Medicaid in NH, we do not anticipate exorbitant fees. The cost was calculated based on supporting 10-15 clients per year, at an average of $500 per client.

**Dental** care will be provided by referral at no cost to the grant. Costs will be covered by insurance or by *pro bono* support (to be recruited). Project partners have several dental referral partners to use, depending on a victim’s insurance. These include Dental Connections, Family First Dental, and the Easter Seals Dental Clinic for victims that have Medicaid, and Small Smiles for children with Medicaid. Partner **Families First** also provides dental care. For victims that do not have dental insurance, the Project Director will work with the Task Force faith-based and community partners to recruit *pro bono* services from their congregations and connections. For any other costs we have included dental costs in our total healthcare allocation, described above.

**Mental Health** counseling services will be provide by **CFS** in-house for children, youth, and adults, couples and families. Funding for this service comes from insurance reimbursement and charitable donations. For victims over 21, and those requiring more intense support, CFS will make referrals to partners as follows: In **Hillsborough**, **Manchester Community Health** will provide assessments, individual counseling, and medication management among other services. Funds for these services are largely through insurance, at no cost to the grant. For uninsured case managers will work to enroll victims on state sponsored health plan and/or apply to victim’s compensation for reimbursement for mental health services. Also in Hillsborough, the Mental Health Center of Greater Manchester will provide emergency mental health assessments, counseling, and group therapy. These services are covered by insurance, and the Mental Health Center will assist victims in applying for insurance. In **Rockingham** **Families First** will provide
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Mental health counseling through insurance or a sliding scale fee for uninsured. For costs outside of insurance we have included mental health in our total healthcare allocation, described above.

**Interpretation and Translation** will be provided through a combination of trained volunteers and Language Bank at partner Ascentria Care Alliance to ensure all victims receive linguistically appropriate services. The grant has allocated $1650 per year for interpretation and translation services. Volunteers will be recruited by outreach through our faith-based and university partners, and they will receive training on confidentiality and providing interpretation by the Project Director.

**Substance Abuse Treatment**, including assessment, outpatient counseling, and recovery support, will be provided in-house by CFS at no cost to the grant for youth 12-24 and their families in both Hillsborough and Rockingham. Other partners in Hillsborough include Manchester Community Health Center and Elliot Hospital. Manchester Community Health Center will provide services including screening, brief intervention and referrals to treatment. In addition Manchester Community Health provides licensed alcohol and drug counselors on site for substance use counseling for patients and can provide referrals to other community services offering higher levels of care for substance use treatment. Costs for these services are covered by insurance, at no cost to the grant. Uninsured patients can access services through the NH Bureau of Drug Abuse Services. Elliot Hospital provides beds for medical detox. At present this is an informal agreement, established by ICE/HSI and the ER staff. Over the course of the project period we will look to formalize this arrangement, and replicate it at other hospitals.

**Families in Transition** will provide substance use treatment to women in Hillsborough and Rockingham. This service is covered by insurance. For costs outside of insurance and these programs we have included substance abuse treatment in our total healthcare allocation.
Moreover, we note that, as stated in the Narrative, substance abuse has become a significant challenge in NH. The state faces one of the worst opiate epidemics in the country, and “...is second to last, ahead of only Texas, in access to treatment programs. New Hampshire spends $8 per capita on treatment for substance abuse. Connecticut, for example, spends twice that amount.” The state is in the midst of implementing a comprehensive plan to build capacity for such treatment, and we will work with the Governor’s Commission on Alcohol and Drug Abuse Prevention, Treatment, and Recovery to engage stakeholders and identify additional treatment and recovery supports throughout the 3 year project period.

**Assistance with HHS certification** will be provided through the OVC funded Project Director Erin Albright, and the two ICMs. Attorney Albright managed the TVAP program, which supports foreign national victims seeking certification, for all of New England for the past 4 years. She is well versed in the process of certification, including coordination with law enforcement and allied experts to obtain documentation necessary to achieve ORR certification and assistance in coordination with federal law enforcement to request CP. She will work with immigration attorneys during this process. The two ICMs will provide assistance in obtaining necessary documents to support the victim’s application for services and programs for which they may be eligible.

**Victim Advocacy/Rights** will be provide by OVC funded ICMs as part of intensive case management. This includes accompaniment to court-proceedings, assistance in applying for benefits such as victim’s compensation. It also includes coordination/working with law enforcement victim specialists and advocates, including the Department of Homeland Security.

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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims

Victim Assistance Specialist works under the Victim/Witness Coordinator at the U.S. Attorney’s Office and the Office for Victim Assistance at the NH Attorney General’s Office. When relevant, State SART Coordinator, will help case managers and victims connect with the SART team in the appropriate region. For sexual assault forensic medical exams the ICM will work with Weeks from the NH Coalition Against Domestic and Sexual Violence.

**Life Skills** will be provided to all victims in house by OVC funded staff as part of intensive case management, and through in-house referrals to CFS independent living skills workshops offered at our drop-in centers and as part of our transitional living program. These workshops are funded by Administration for Children and Families, fundraising activities and charitable grants. These services include, but are not limited to, developing healthy relationships, managing household budgets, understanding program expectations, parenting classes, and self-care classes. Many of our service provider partners also provide life skills supports, and will do so as appropriate at no cost to the grant. For specific agencies see Attachment 13, Service Provider Partner MOUs.

**Literacy, job training, skills** will be provided through MOUs with partners at no cost to the grant. **Goodwill Northern New England** (Goodwill NNE) will provide job training and employment assistance for victims in Rockingham and Merrimack Counties that are considered an eligible homeless family, as defined by current Job Connection services program offered in partnership with Families in Transition. These services are delivered with an understanding of the barriers vulnerable populations often face in finding and keeping employment, and combine social work best practices and skilled workforce development tactics in order to ensure successful, long-term employment for each person served through this specialized service.
IINH will provide job training and culturally appropriate ESOL classes for foreign national victims in Hillsborough. ESOL classes are funded by the state, and IINH has contributed classes for 3 victims, for a total of $3585 in in-kind matching funds per year. Job training is funded by a mix of federal sources through ORR and DOL and other state and private funds and will be provided at no cost to the grant. For GED assistance, ICMs will make referrals to the Workforce Investment Act programs. For Hillsborough this is NH Jobs for American Grads (NH-JAG), and My Turn in Rockingham.

**Employment Assistance** will be provided through in-house referrals to CFS Street Outreach Program for youth ages 18-21 at no cost to the grant. Funding for this comes from HHS Administration for Children and Families, Family and Youth Service Bureau as well as charitable funding and in Manchester some city funding. **Goodwill Northern NNE** will provide employment assistance at no cost to the grant in Rockingham and Merrimack Counties for victims that meet program eligibility requirements state above. To increase long term success, Goodwill support will not end when the job is secured. They will continue to work with victims until they are secure in the job and building personal stability.

Partner IINH will provide employment assistance at no cost to the grant, which may include vocational training, literacy training contextualized to a work setting, employment match programs, or transitional job programs, for all foreign nationals in Hillsborough through existing services funded by a mix of federal sources through ORR and DOL and other state and private funds. IINH currently provides these services to refugee and immigrant populations in Manchester and its surrounding communities, and to trafficking victims enrolled in TVAP. IINH also holds strong relationships with career centers and employment training programs throughout the state that can be leveraged for foreign national victims outside of the Manchester area.
**Transportation** will be provided using a variety of methods. OVC funded ICMs will provide transportation as part of intensive case management. In addition to staff time, 30 victims will be supported with gas cards, bus passes or taxi fare for local travel to attend meetings, doctor appointments, court appearances, job interviews or other travel needed to support safe, independent living. We have allocated $75 per year for 30 clients, for a total of $2,250 per year, or a 3 year total of $6,750 for this transportation. Several project partners including Manchester Community Health, DCYF, and YWCA also provide transportation assistance and will continue to do so at no cost to the grant. For victims located areas with public transportation options, ICMs will help them obtain a bus pass and provide an orientation to public transportation if necessary. For foreign national victims INNH has a relationship with the Manchester Transit Authority City Bus Service to provide victims with such an orientation. Transportation for certified foreign national victims will be the responsibility of the TVAP program.

**24-hour response** will be provided through the existing CFS 24-hour hotline. This hot-lines function on a rotating on-call system, ensuring that someone is always available. Cost to the grant will be that of OVC funded staff time when the 2 ICM’s rotations occur. All individuals that staff the lines will receive special training on human trafficking, and the project will implement a protocol for responding to victim emergencies and emergency referrals after hours, modeled after Vermont’s Rapid Response Support System (RRSS), which was designed and implemented by Project Director Erin Albright. The materials, training, and procedures used in VT’s RRSS will be adapted to NH’s unique circumstances. Several partners also have 24/7 emergency lines, and CFS will work with the Project Director and the Services Committee to connect these lines and establish a protocol for victim emergencies and after hour referrals.

**Legal Services:** Legal services will be provided by New Hampshire Legal Assistance
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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims (NHLA). All victims will be offered a comprehensive legal screening, performed by NHLA.

This will include an explanation of rights and protections, and assistance with victim’s rights enforcement. We have allocated $5,000 per year for this service to include a 2 hour comprehensive legal screening for 30 clients, and 10 hours of follow up administrative and case tasks, at $50 per hour. NHLA will represent up to ten clients per year or matters related to housing, public benefits, domestic violence petitions, and education law at no cost to the grant. NHLA will refer clients with needs beyond those specific areas to trusted pro bono attorneys.
Attachment 5: Plan for delivering training & accessing professional development opportunities

As part of the goals and objectives the project will conduct training and awareness activities and provide Task Force (TF) members with professional development opportunities.

**Development/Adaptation Of Training And Public Awareness Materials:** The TF has an existing Introduction to Human Trafficking ("Intro") training developed collaboratively by law enforcement and service providers that we will adapt as necessary and use to educate stakeholders and the community about human trafficking and TF activities. Topics covered include the global and local scope of the problem; laws and definitions including the definition of a victim under 22 U.S.C. § 7102(9); victim and perpetrator profiles and dynamics; risk factors and red flags; victim needs and services; and an overview of the TF. The content is suitable for all presentations delivered by the TF, whether joint presentations or targeting specific audiences. It includes both labor and sex trafficking, and uses case examples to illustrate the diversity of trafficking cases, victims, and traffickers. The TF Director will deliver this training to the full TF during our October meeting as part of an onboarding and orientation to the project.

The TF will compile a Library of additional jointly developed content that can be easily added to the Intro training to tailor it to specific audiences and/or provide more advanced level information. For example, a section on accessing public benefits might be added to a training for service providers, and a case study on labor trafficking might have additional facts related to the investigation added to it for a law enforcement audience. Through the Library as a clearinghouse, we will be able to ensure consistent messaging and quality content while simultaneously allowing for trainings to be tailored and flexible. In our experience, the more we are able to tailor the material to the audience, the greater the impact. This project will leverage the previous work of the Project Director and other members, and will be overseen by the Director and the Training and Community Engagement Committee. Both the Intro and Library will improve stakeholder
Purpose Area 1: Development of Human Trafficking Task Forces

Attachment 5: Plan for delivering training & accessing professional development opportunities ability to identify all forms of human trafficking, connect all victims with services, and where applicable investigate all forms of trafficking and deliver services to all victims.

The TF will use Blue Campaign and Rescue and Restore materials. We have also begun to develop a 7-10 minute “Snapshot of Human Trafficking in New Hampshire” video featuring TF members answering basic questions about the definition of trafficking, where it happens, victims and perpetrators, and how NH is responding. All filming and editing to-date has been donated, and we hope to have a final product by the fall. We will engage audiences to connect the problem to NH, and to learn how they can contact the TF for trainings, technical assistance, or to report a case. Should the need arise to develop additional materials the Training Committee will collaborate to design the materials and leverage community support to produce them.

**Target Audiences:** The results of the Baseline survey are helping us to identify specific gaps in knowledge. For example 37% of respondents indicated that they had received no training in human trafficking; 44% had received some training on recognizing sex trafficking, while only 24% had received training in recognizing labor trafficking. The survey also helps us identify specific training needs by asking respondents to identify the top three training topics that would benefit their organization, illustrated in the table below:

<table>
<thead>
<tr>
<th>Topic</th>
<th># responses</th>
<th>%</th>
<th>Topic</th>
<th># responses</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognizing Sex Trafficking</td>
<td>320</td>
<td>77.10%</td>
<td>Laws and definitions</td>
<td>265</td>
<td>63.90%</td>
</tr>
<tr>
<td>Recognizing Labor Trafficking</td>
<td>298</td>
<td>71.80%</td>
<td>Victim and perpetrator profiles/dynamics</td>
<td>263</td>
<td>63.40%</td>
</tr>
<tr>
<td>Working with victims generally (victim experience, needs, support)</td>
<td>219</td>
<td>52.80%</td>
<td>Special considerations when working with foreign nationals</td>
<td>190</td>
<td>45.80%</td>
</tr>
<tr>
<td>Special considerations when working with minors (example: DCVF involvement)</td>
<td>210</td>
<td>50.60%</td>
<td>Special considerations when working with male, LGBTQ, and disabled victims</td>
<td>194</td>
<td>46.70%</td>
</tr>
<tr>
<td>Victim-Centered Approach and Trauma Informed Care for victims</td>
<td>196</td>
<td>47.20%</td>
<td>Investigating/Prosecuting a case</td>
<td>150</td>
<td>36.10%</td>
</tr>
<tr>
<td>Legal needs and services for victims</td>
<td>222</td>
<td>53.50%</td>
<td>Interviewing victims</td>
<td>173</td>
<td>41.70%</td>
</tr>
<tr>
<td>Health impact and care for victims</td>
<td>183</td>
<td>44.10%</td>
<td>Other</td>
<td>13</td>
<td>3.10%</td>
</tr>
</tbody>
</table>

Results can be analyzed by profession and geographic location, and will be used to identify target groups, individuals and organizations for training to improve the ability of the TF to
Purpose Area 1: Development of Human Trafficking Task Forces
Attachment 5: Plan for delivering training & accessing professional development opportunities identify and serve all types of trafficking victims.

**Delivery**: Stakeholder trainings will occur semi-annually in 5 locations statewide such as Portsmouth, Keene, Lebanon, Berlin, and Conway. These are large cities spread throughout the state, enabling the TF to draw in diverse geographic audiences. Costs will be approximately $983 in mileage, covered by MPD, as well as project funded staff time shared by MPD and CFS. Additional stakeholder trainings may be provided upon request, at no cost to the grant except staff time. Delivery will be by Key Staff listed below, and members of the Training Committee.

**Professional Development**: First, through attending professional conferences. Sgt. [Redacted] from MP, [Redacted] from CFS, Project Director [Redacted] and 1 additional representative from MPD and CFS each will attend the BJA/OVC 2 day kick-off meeting. MPD and CFS will also send 2 representatives each (to be determined upon announcement of the conference time, location, and agenda) to one 4 day human trafficking training organized by DOJ or OJP. Two representatives from CFS will attend one OVC regional grante meeting per year. Finally, two representatives from both law enforcement and service providers will also attend the annual Freedom Network Conference. This conference brings together experts in the anti-trafficking field, offering two days of workshops for professional development for both law enforcement and services, as well as TF development. Sending 2 people to each conference will maximize professional development opportunities and ensure that all key staff are informed. Whenever possible the TF will send different people to conferences to ensure as many members as possible have opportunities for such professional development. Total costs for these conferences for CFS are: $8,295 in year 1, and $4,233 in both year 2 and 3. For MPD: $8,104 in year 1, and $2664 in both years 2 and 3. See Attachment 8 for cost breakdown and description.

Second, professional development will be offered for all TF members semi-annually, during
Purpose Area 1: Development of Human Trafficking Task Forces

Attachment 5: Plan for delivering training & accessing professional development opportunities our regular monthly meeting. The first of the 6 trainings will be the Intro training described above, which includes both laws and definitions, and identifying labor and sex trafficking. These three topics received the highest interest for additional training in our Baseline survey. Subsequent topics will be determined in a similar manner, based on surveys and/or informal polling and availability of trainers capable of delivering needed topics such as trauma-informed techniques for screening/interviewing victims and collaboration and building multidisciplinary relationships. These trainings will be delivered by TF members with the relevant expertise.

In addition to the Freedom Network Conference, Law Enforcement will bring in local experts for 2 of their quarterly meetings to provide professional development. For more information see Attachment 3. We will also look to leverage existing professional development such as that provided by the International Association of Chiefs of Police through a federal grant.

In addition to the Freedom Network Conference, Service providers will hold 2 professional development trainings annually at the Services Committee meeting. Finally, we will leverage opportunities available through webinars, and other federal grant-funded initiatives such as the 16 hour training for legal services delivered by Coalition to Abolish Slavery and Trafficking.

Cost and Key staff to conduct the activities described above include: (CFS), and will each dedicate 5% of her time each year to delivering trainings to stakeholders (CFS: $3,880), will dedicated 4 hours per month to the same, for a total cost of $3,414 per year in years 2 and 3. The Project Director will also dedicate time to developing/adapting materials, coordinating and delivering stakeholder trainings and professional development. MPD and CFS will split this cost as follows: CFS year 1, 5% (3,250), MPD 10% ($6,500); years 2 and 3: 10% ($6,500 each) for a total of: CFS - $9,750, MPD - $13,000. See Attachment 8, Budget for additional information.
Program Evaluation and Data Collection Plan

Costs dedicated to data collection and evaluation activities:

Manchester PD and Child (MPD) and Family Services (CFS) will share the cost of data collection and evaluation. The agreed costs are: MPD will pay $15,000 per year, for 3 years, for the Evaluation Consultant. The CFS share will cover travel for the Evaluator at a cost of $1,361, and 15% of the Project Director's time ($9,750). Data collection by Intensive case managers is part of routine case management tasks.

Proposed methods for the collection of data including a plan to use Online:

The project will collect all data outlined in the performance measures including, but not limited to: TF development and functions such as protocol development, members, and meetings; trainings activities such as content development, delivery, and audiences; investigations and prosecutions; and services for victims. The project will use the OVC Trafficking Information Management System (TIMS) and the BJA Performance Measurement Tool (PMT) as the primary mechanisms for collecting and managing data.

MPD and CFS have delegated responsibility for management and oversight of data collection to the Project Director, including ensuring quarterly reporting into TIMS and PMT. Key staff responsible for data collection are the representatives of the agencies that comprise the Core Team including: Project Director, the Intensive Case Managers, CFS Program Director, MPD Sergeant, the assigned MPD detective, ICE/HSI RAC, AUSA and Victim Witness Coordinator. Actual entry of data into TIMS and PMT will be limited to Core Team members, with specific responsibilities to be determined based on efficiency and consistency considerations. For example, Intensive Case Managers will likely enter the information related to service delivery...
ATTACHMENT 6: Plan for Evaluation and Data Collection for Performance Measures
directly into TIMS, whereas information about a training and audiences might be reported to the
Project Director who will then enter it into PMT. All performance measure data will be reported
into TIMS and PMT quarterly at a minimum.

Information from non-Core Team partners will be collected and reported into TIMS and
PMT by the Project Director, using tools such as the TIMS tracking forms found in the OVC
Human Trafficking Task Force e-guide online. The Project Director will create any additional
tools necessary to facilitate data collection, including for PMT, and will be responsible for
providing training and orientation to the all TF members on data collection and use of the tools.
All data/performance metrics accrued prior to the orientation and implementation of the data
collection and tracking tools will be gathered by phone/email by the Project Director and entered
into TIMS and PMT.

At each Core Team quarterly meeting, Manchester Police Department, Child and Family
Services, The USAO, ICE/HIS, and the Project Director will discuss data collected and share
aggregate-level data that was reported through TIMS and PMT and other sources. From this
discussion, the Project Director will create one report that will be submitted to BJA and OVC as
part of the semi-annual progress reporting along with other documentation of TF work such as
meeting minutes, participation lists, and agendas. The information collected will also be shared
with the TF quarterly.

Project partners are committed to ensuring that all participants are fully informed about their
rights as to participation in the project, including data collection for evaluation, and their consent
to do so. The project will adhere to strict confidentiality policies with regard to collection and
entry of data. All participants will receive an explanation of information collected relevant to
their cases/services, and will be asked to sign an informed consent agreement to collect data, and
Purpose Area 1: Development of Human Trafficking Task Forces
Competition ID #: [REDACTED]
ATTACHMENT 6: Plan for Evaluation and Data Collection for Performance Measures

informed that agreement is voluntary and may be terminated at any time.

The evaluation consultant, qualifications, methodology and timeline:

**Evaluation Consultant:** The evaluation consultant will be Dr. [REDACTED], Associate Professor of Criminal Justice at Plymouth State University. Dr. [REDACTED] has extensive experience conducting applied evaluations recent project collaborators including the NH Courts, Juvenile Justice Agencies in Belknap County, UNH Cooperative Extension and some NH schools. Dr. [REDACTED] current project assists the NH Courts in evaluating their protocols which aim to make the courtroom environment more comfortable for children.

**Methodology and Timeline:** Dr. [REDACTED] will utilize a developmental evaluation approach (Patton, 2010) in implementing a process evaluation and analysis of the taskforce performance data throughout the grant period. A developmental approach is warranted, as this is a complex issue in a multifaceted system. Solutions and actions to overcome problems may not always be clear, and stakeholders may conflict on how to act. Dr. [REDACTED] role as the evaluator is thus as a team member, who partners with the other stakeholders to guide and facilitate learning, reflection, innovation and change.

Regular dissemination of information to TF members, in either reports and or visual displays (e.g. maps, graphs), will be the key to facilitating development of a process of continuous quality improvement and data-driven decision making. Using a utilization-focus approach (Patton, 2008), Dr. [REDACTED] will provide real-time feedback and information to the taskforce to facilitate a continuous development loop. The performance data entered into the PMT and TIMS systems by the Core Team will be analyzed by Dr. [REDACTED] or her graduate assistant quarterly and shared with taskforce members, with a written report produced annually. Additionally, the Dr. [REDACTED] will assist with data analysis for semi-annual reports and explaining any differences or discrepancies.
In addition to the performance measures, Dr. [Redacted] will assist the taskforce in collecting qualitative information to inform their practice beyond what provided by the performance measures. This includes developing a survey for professionals in New Hampshire who might encounter human trafficking survivors to continue to assess awareness, knowledge, perceptions of the problem in New Hampshire and training needs. The survey would be developed as a web-survey using Qualtrics and adapted from the TF Baseline survey.

Additionally, approximately 20 interviews of taskforce or key stakeholders will be conducted to assess process and implementation information not captured by the performance measures. Dr. [Redacted] will work with the Core Team to develop the questions for interviews. Interviews will be approximately 1 hour, with an additional hour of Dr. [Redacted] time spent in preparation and follow up activities. All interviews will take place via Skype or telephone to reduce time and costs related to travel. Interviews will likely occur in the 3rd and 4th quarter each year, in order to allow for enough time for the project to begin and for partners to engage in the funded work. In order to provide continued improvement, interviews will occur in all three of the project years.

All members of the Core Team will be involved with overseeing evaluation activities and the work of Dr. [Redacted] with primary responsibility resting with the Project Director. Using a developmental approach, the evaluation plan is emergent and developed in collaboration with others and hence subject to change. To start the evaluation process, the evaluator will orient to the issue, build relationships with task force members and key stakeholders and work to develop a learning framework with taskforce members.
Purpose Area 1: Development of Human Trafficking Task Forces

All objective and activities stem from, and are in furtherance of, the Task Force’s goal of continuing to develop and enhance the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to: a) Identify victims of all forms of trafficking; b) Investigate & prosecute sex and labor cases at local, state, federal level; and c) Address individualized service needs of victims through delivery of a comprehensive array of services.

<table>
<thead>
<tr>
<th>Abbreviation Key</th>
</tr>
</thead>
<tbody>
<tr>
<td>MPD: Manchester Police Department</td>
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<tr>
<td>CFS: Child and Family Services</td>
</tr>
<tr>
<td>USAO: United States’ Attorney’s Office</td>
</tr>
<tr>
<td>HSI: Homeland Security Investigations</td>
</tr>
<tr>
<td>LEC: Law Enforcement Committee</td>
</tr>
<tr>
<td>VSC: Victim Services Committee</td>
</tr>
<tr>
<td>TCE: Training &amp; Community Engagement Committee</td>
</tr>
<tr>
<td>Director: Project Director</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity</td>
</tr>
<tr>
<td>Finalize partner MOU</td>
</tr>
<tr>
<td>Finalize membership MOU</td>
</tr>
<tr>
<td>Core Team Meetings (quarterly)</td>
</tr>
<tr>
<td>Protocol Development</td>
</tr>
<tr>
<td>Protocol review, finalizing, and updating</td>
</tr>
<tr>
<td>Convene Full Task Force Meetings</td>
</tr>
<tr>
<td>Law Enforcement Committee quarterly meetings</td>
</tr>
<tr>
<td>Victim Services Committee quarterly meetings</td>
</tr>
<tr>
<td>Training and Community Engagement Committee meetings</td>
</tr>
<tr>
<td>Project Group meetings</td>
</tr>
</tbody>
</table>

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### Purpose Area 1: Development of Human Trafficking Task Forces

**Competition ID #** [Redacted]

**ATTACHMENT 7: Project Timeline**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Recruit new members based on identified gaps and state-wide capacity building</strong></td>
<td>Core Team</td>
<td>Ongoing as necessary</td>
<td>Ongoing as necessary</td>
<td>Ongoing as necessary</td>
</tr>
<tr>
<td><strong>OBJ. 2: Make data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking within geographic area</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop data collection and tracking tools</td>
<td>Director &amp; Evaluator</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide training/orientation to all project partners on performance measures and data collection tools</td>
<td>Director, Core Team</td>
<td>X X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Collect performance measure data using tools developed¹</td>
<td>All</td>
<td>X X X X X X</td>
<td>X X X X X X</td>
<td>X X X X X X</td>
</tr>
<tr>
<td>Collect performance measure data from project partners and enter in TIMS</td>
<td>Director</td>
<td>X X X X</td>
<td>X X X X</td>
<td>X X X X</td>
</tr>
<tr>
<td>Collect performance measure data from project partners and enter in PMT</td>
<td>Director</td>
<td>X X X X</td>
<td>X X X X</td>
<td>X X X X</td>
</tr>
<tr>
<td>Share data with TF members</td>
<td>Director, Evaluator</td>
<td>X X X X</td>
<td>X X X X</td>
<td>X X X X</td>
</tr>
<tr>
<td>Compile and Submit semi-annual report through GMS including identical aggregate data reports from TIMS and PMT</td>
<td>Director, Evaluator</td>
<td>X X</td>
<td>X X</td>
<td>X X</td>
</tr>
<tr>
<td>Finalize MOU with Plymouth State University for Program Evaluation</td>
<td>Core Team</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop evaluation questionnaire</td>
<td>Evaluator &amp; Core Team</td>
<td>X X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evaluator analysis of performance metrics</td>
<td>Evaluator</td>
<td>X X X X</td>
<td>X X X X</td>
<td>X X X X</td>
</tr>
<tr>
<td>Evaluator interviews with stakeholders</td>
<td>Evaluator, stakeholders</td>
<td>X X</td>
<td>X X</td>
<td>X X</td>
</tr>
<tr>
<td>Evaluator interim and final reports (required) plus annual report (per proposal)</td>
<td>Evaluator</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

¹ Tools developed.
### Purpose Area 1: Development of Human Trafficking Task Forces

**Competition ID:** [009] [087] [101]

**ATTACHMENT 7: Project Timeline**

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<thead>
<tr>
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<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>OBJ. 3: Identify victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attend DOJ/OJP 4 day trafficking training</td>
<td>2 LEA, 2 VSP – to be determined</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>Attend 2 day OVC grantees meeting</td>
<td>2 CFS staff, TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>Attend DOJ kickoff meeting</td>
<td>Director, MPD Sgt. Thompson, CFS Erin Kelly + 1 additional MPD and CFS staff</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>Attend Freedom Network professional</td>
<td>2 LEA, 2 VSP to be determined</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>development conference</td>
<td>Adapt and finalize basic training for general audiences</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Tailor basic training for priority</td>
<td>Director + Training Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>professional audiences</td>
<td>Conduct introductory training/project orientation for project partners (first of 6 professional development)</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct semi-annual professional development training for project partners (remaining 5 professional development)</td>
<td>TBD from TF members, stakeholders</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct professional development for law</td>
<td>TBD</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>enforcement</td>
<td>Conduct professional development for service providers</td>
<td>TBD</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct training for relevant stakeholders</td>
<td>Director, CFS MPD, Training Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

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### Purpose Area 1: Development of Human Trafficking Task Forces

#### ATTACHMENT 7: Project Timeline

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<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compile a training library to be shared by project partners</td>
<td>Training Committee, Director</td>
<td>X</td>
<td>Ongoing as necessary</td>
<td>Ongoing as necessary</td>
</tr>
<tr>
<td>Conduct and/or participate in public awareness activities</td>
<td>All members</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Ongoing</td>
</tr>
<tr>
<td><strong>OBJ 4: Conduct proactive investigations of sex and labor trafficking with goal of successful prosecution of cases at state or federal level</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Threat Assessment</td>
<td>Law Enforcement Committee</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Law Enforcement Committee meetings</td>
<td>MPD, HSI, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Law Enforcement professional development</td>
<td>TBD</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Proactive Investigations</td>
<td>All law enforcement partners</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Work with Police Standards and Training to incorporate trafficking into academy</td>
<td>MPD, HSI, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Outreach to labor investigators</td>
<td>MPD, Law Enforcement Committee, DOL</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Outreach to new police departments</td>
<td>MPD, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>OBJ 5: Ensure a comprehensive array of services are readily available to meet individualized needs of all victims</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hire Intensive Case Managers</td>
<td>CFS</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide Intensive case management and comprehensive services delivery</td>
<td>CFS, Intensive Case Managers</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Finalize CCR partner MOUs</td>
<td>Director</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Purpose Area 1: Development of Human Trafficking Task Forces**

**Competition ID #: 2018-LPLC-10C**

**ATTACHMENT 7: Project Timeline**

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<tr>
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<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expand CCR statewide</td>
<td>Services Committee, Director</td>
<td>Q1</td>
<td>X</td>
<td>Ongoing</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q2</td>
<td>Q3</td>
<td>Q4</td>
</tr>
</tbody>
</table>

1. The Director will gather by phone and/or email all data/performance metrics accrued prior to the orientation and implementation of the data collection and tracking tools and enter into TIMS and PMT.
BAR ADMISSION
Massachusetts Bar November 2010 - Present

EXPERIENCE
Give Way to Freedom Boston, MA
Regional Program Director October 2013 - Present
• Provide support and technical assistance to Task Forces and other stakeholders for the development of multidisciplinary, collaborative partnerships and protocols
• Develop and implement, in collaboration with United States Attorney's Office (VT) and Vermont Human Trafficking Task Force, Rapid Response program enabling law enforcement to connect victims of human trafficking with trained service providers as soon as possible after identification
• Build capacity for legal and social services for victims of trafficking in New England and downstate New York through identification of partners, coordination of training, and case oversight
• Provide technical assistance on policy related to human trafficking including criminal statutes, victims compensation statutes and regulations, and licensing regulations

International Institute of New England Boston, MA
Anti-Trafficking in Persons Regional Service Coordinator October 2011 - Present
• Establish and manage regional network of victim services agencies to provide victim centered, trauma informed comprehensive case management to victims of human trafficking
• Deliver comprehensive case management to victims of human trafficking including strengths-based individualized service planning and case coordination with law enforcement and attorneys
• Provide tailored training and technical assistance to victim services providers, law enforcement, and attorneys on cultural competency and working with foreign national victims of trafficking

Massachusetts Task Force to Combat Human Trafficking Boston, MA
Data and Outreach Specialist October 2009 - October 2011
Legal Intern June 2009 - October 2009
• Designed, implemented, and managed case data tracking system to compliment federal reporting requirements and provide reports for RPD leadership
• Performed in depth review and analysis of state, national, and international legislation on human trafficking and drafted new legislation to incorporate best practices and emerging issues
• Researched and created presentations and training materials for variety of audiences on topics including federal and state laws, best practices in combating labor trafficking for Harvard Carr Center sponsored webinar, and country specific information for international audience

Massachusetts Superior Court Boston, MA
Judicial Fellow (Clerk) September 2010 - October 2011
• Prepared draft decisions and legal memoranda for civil and criminal cases
• Worked extensively with Justices on trials, hearings and motion sessions

Boston College Immigration and Asylum Project Boston, MA
Legal Intern January 2009 - May 2009
• Represented client on successful motion to reopen application for asylum case
• Participated in Know Your Rights presentations at local detention centers, conducting interviews and providing advice on individual cases
PROFESSIONAL ORGANIZATIONS and LEADERSHIP EXPERIENCE

**Freedom Network**
- Member of Steering Committee
- Co-chair of Policy Committee

**New Hampshire Commission to Combat Human Trafficking (now Task Force)**
- Chair of Task Force
- Member of Executive Committee
- Member of Training and Community Partnership Committee

**Vermont Human Trafficking Task Force**
- Technical Advisor to the Task Force

**Boston Bar Association, Delivery of Legal Services Committee**
- Member of Steering Committee
- Co-chair of Human Trafficking Sub-Committee

SELECT PRESENTATIONS

**U.S. Department of Labor, Wage & Hour Division (New England)**
- Identifying and Investigating Labor Trafficking

**New England Council on Crime & Delinquency Annual Conference**
- Trauma & Its Relevance in Cases of Human Trafficking

**Freedom Network Annual Conference**
- Human Trafficking Task Force Troubleshooting

**Preble Street Anti-Trafficking Coalition, ME**
- Collaboration & Protocol Development for Multi-Disciplinary Teams

**New Hampshire Advisory Panel to US Commission on Civil Rights**
- Testimony on status of anti-trafficking efforts in New Hampshire

**Maine Advisory Panel to US Commission on Civil Rights**
- Testimony on enhancing capacity to combat labor trafficking

**Los Angeles Police Department, West Valley Division**
- Training on building victim-centered investigations

**Vermont Rapid Response Support System Stakeholder Training**
- Confidentiality & Information Sharing in Human Trafficking Cases: Special Considerations for Advocates in a Multi-Disciplinary Setting

**New Hampshire Twentieth Annual Child Abuse and Neglect Conference**
- Service Provider Response to Human Trafficking: Identifying Victims & Establishing Key Partnerships

**Not for Sale: 2012 Annual Tri-State Advanced Victim Assistance Conference, VT**
- Anti-Trafficking Legislation and Protocol Development: A New England Regional Comparison

SELECT PUBLICATION

**Human Trafficking: Guidebook on Identification, Assessment, and Response in the Healthcare Setting**, co-authored with Alpert LJ, Ahn R, Purcell J, Macias-Koanantopoulos W. Massachusetts Medical Society Committee on Violence Intervention and Prevention

EDUCATION

**Boston College Law School, Newton, MA**
- *J.D.*, May 2010

**University of Mary Washington, Fredericksburg, VA**
- Bachelor of Arts, *cum laude*, in International Affairs, May 2005
EDUCATION

Union Institute and University - Vermont College, Brattleboro, Vermont
2004-2006 Master of Arts, Psychology and Counseling

Gordon College - Wenham, Massachusetts
1997-2001 Bachelor of Arts, Psychology
1997-2001 Bachelor of Arts, Youth Ministry

LICENSE

Board of Mental Health Practice State of New Hampshire,
Licensed Clinical Mental Health Counselor, License # 722

PROFESSIONAL APPOINTMENTS/MEMBERSHIPS

- 2013-Present New Hampshire Attorney General’s Commission on Human Trafficking and Sexual Exploitation – representative of youth services
- 2010-Present New Hampshire Balance of State Continuum of Care
- 2008-Present New Hampshire Homeless Teen Task Force
- 2008-Present Manchester Continuum of Care
- 2011-2013 New Hampshire State Suicide Prevention Council – Governor appointed representative of youth services
- 2012 United States Family and Youth Services Bureau Focus Group on Runaway and Homeless Youth Program Outcomes – Regional representative
- 2010-2012 New Hampshire HIV and STD Division Community Planning Group – representative of youth services
- 2006-2011 New Hampshire Alcohol, Tobacco, and other Drug Service Providers Association – representative of youth prevention services

PROFESSIONAL EXPERIENCE

January 2014-Present
Program Director – Child and Family Service of New Hampshire, Manchester, NH

- Direct the operations of the continuum of programs serving runaway and homeless youth including Basic Center Programs, Street Outreach Programs, Drop-in Services, Transitional Living Programs, and Maternity Group Home Programs.
- Provide all administrative and clinical supervision for Program Manager.
- Provide oversight for a staff of 16.
- Develop and implement strategic plan for all programs including facilitating staff participation, presenting to agency operations team, incorporating feedback, and identifying and bringing to fruition prioritized goals
- Oversee local, state, and federal grant applications, reporting and contracts
- Develop and manage program budgets
- Provide program evaluation and outcome data
February 2010-January 2014
Program Manager - Child and Family Services of New Hampshire, Manchester, NH
- Manage the day-to-day operations of programs serving runaway and homeless youth including 2 Basic Center Programs, 2 Street Outreach Programs, and a drop-in facility.
- Provide all administrative and clinical supervision for staff of ten.
- Develop and implement strategic plan for all programs including facilitating staff participation, presenting to agency operations team, incorporating feedback, and identifying and bringing to fruition prioritized goals.
- Facilitate the professional growth of staff by providing guidance around goal development and relevant learning opportunities.
- Oversee local, state, and federal grant applications, reporting, and contracts.
- Develop and manage program budgets.
- Provide program evaluation and outcome data.

November 2008-February 2010
Runaway and Homeless Youth Program & Student Assistance Program Supervisor - Child and Family Services of NH, Manchester, NH
- Supervised the day-to-day operations of a substance use prevention program in four high schools.
- Provided administrative and clinical supervision for staff of four.
- Established and maintained relationships with community organizations, key partners, and school department administration.
- Completed proposals and reports for all federal grants and state contracts.
- Provided evaluation from an evidence-based intervention perspective.

July 2006-November 2008
Home-Based Family Therapist - Child & Family Services of NH, Manchester, NH
- Provided court-ordered family counseling services and case management to families involved with the juvenile justice system or child protective services.
- Advocated for youth and families in the educational system, court setting, and within community services.
- Provided referrals for relevant community services when appropriate.
- Developed and implemented client-centered treatment plans to address youth and family functioning and maintained on-going documentation to measure progress.

September 2005 – May 2006
Masters Level Counseling Intern – New England College Counseling Center, Henniker, NH
- Provided individual office-based counseling services to New England College students with an average caseload of ten.
- Provided psycho-educational groups for students who committed a substance use offense on campus.
- Developed and taught semester long elective class focused on health and wellness – composing course description and syllabus, and instructing 15 students.

August 2005-July 2006
Residential Counselor - Wediko Children’s Services, Windsor, NH

Recent trainings & certifications, transcripts, job reviews, and references available upon request.
PROFESSIONAL EXPERIENCE
Child and Family Services – Manchester, New Hampshire (2013 to present)
Senior Vice President, Chief Operating Officer
• Work with management team to ensure acceptable standards of professional practice & responsiveness to community needs. • Support and consult with team in employees matters.
• Participate in preparation of the annual budget, ensure agency programs are administered within budget and maintain proper fund accounting. • Participate in developing and coordinating sound community programs. • Participate in community collaborations.

FIRST – Manchester, New Hampshire (2011 to 2013)
Director, Corporate & Foundation Relationships
• Managed team of 8 to develop and cultivate relationships to raise $16 million annually. Responsible for staff hiring, training and supervision. • Maintain and grow existing donor accounts by providing strategic vision, leadership, and direction. • Create annual business plan, maintain donor database.

CHILD ADVOCACY CENTER – Hillsborough County, New Hampshire (2010 to 2011)
Executive Director
• Provide strategic leadership & management. Supervise 4 staff. Report directly to the board of directors. • Meet standards for accreditation through the National Children’s Alliance. • Create annual work plan & budget. Manage funding to support operations. • Spokesperson.

NEW FUTURES – Exeter, New Hampshire (2005 to 2009),
Director, Adolescent Treatment Initiative and Closing the Treatment Gap Initiative
• Manage large grants & supervise 6 agencies and 15 NH staff to implement initiative. • Implement evidence based treatment in 5 NH communities and expanded use of evidence based practice. • Provided training on the use of evidence based treatment approaches.

RECLAIMING FUTURES – Concord, New Hampshire (2002 to 2005), State Director
• Secured $1.3 million from the Robert Wood Johnson Foundation. • Responsible for hiring, supervising and evaluating work of 6 staff. • Facilitated 5 year strategic planning process with state level advisory board. • Institutionalized screening and assessment protocol in juvenile court system. Screen for risk and protective factors. Expanded juvenile drug courts from 2 sites to 7.

ADDITIONAL PROFESSIONAL EXPERIENCE
Director of Operations and Program Development/Clinical Social Worker
RIVIER COLLEGE – Nashua, New Hampshire (2009 to 2011)
Adjunct Faculty, Communications Department Grant Writing Skills


EDUCATION
Master’s Degree in Social Work (MSW), University of New Hampshire, 1998
Bachelor’s Degree in Social Work (BSW), Rivier College, 1991
PROFESSIONAL EXPERIENCE

Resident Agent in Charge (GS-1811-14); February 2014 to Present
ICE, Homeland Security Investigations, Manchester, NH
Supervisor: ASAC [REDACTED] [REDACTED] (202) 270-3000

- Responsible for overseeing eight Criminal Investigators, one Intelligence Research Specialist, and one Mission Support Specialist
- Lead investigations in accordance with Homeland Security Investigations priorities, to include Child Exploitation, Narcotics, and Human Trafficking
- Area of Responsibility includes the entire State of New Hampshire

Supervisory Special Agent (Group Supervisor) (GS-1811-14); September 2010 to February 2014
ICE, Homeland Security Investigations, Boston, MA
Supervisor: ASAC [REDACTED] [REDACTED] (202) 270-3000

- Utilize my knowledge of immigration and customs laws and regulations, as well as investigative techniques to lead the Gangs and Customs Fraud Group consisting of ten Special Agents, one Intelligence Research Specialist, and an Investigative Assistance.
- Ensure performance and results by conveying clear and attainable expectations to group members. Counsel and develop improvement plans that involve training and teamwork building exercises when expectations are not being met.
- Responsible for a variety of decision making and problem solving activities daily. Examples include prioritizing investigative leads, determining whether to initiate of removal proceedings on potential violators as well as bond determinations, and resolving interpersonal conflict within the group. External partners, such as the United States Attorney’s Office, and other law enforcement agencies, are conferred, as appropriate.
- Temporarily promoted to GS-15 for six months as Assistant Special Agent in Charge (ASAC) from August 2012 through January 2013. Provided oversight to the Hartford CT, New Haven CT, and Springfield MA Resident Agents in Charge, as well as HSI Gang and Customs Fraud Group.
- Acted as ASAC for a three week time period at the time of the Boston Marathon Bombing (04/15/2013) and for three weeks subsequent to the event. During this time, led the immediate and long-term HSI Boston response in a variety of ways to include response funding, scheduling, and reporting.

Supervisory Special Agent (Section Chief) (GS-1811-14); March 2009 to September 2010
ICE, Homeland Security Investigations, Compliance Enforcement Unit (Headquarters), Washington, DC
Supervisor: ASAC [REDACTED] [REDACTED] (612) 236-8000

- Led a team of over 40 contract analysts, three National Program Managers, and four Criminal Research Specialists.
- Managed a $10,000,000 Student and Exchange Visitor Enforcement Program Budget. This budget served to cover analyst contracts, and major case funding. Responsible for allocating, and distributing funding as appropriate.
- Temporarily promoted to GS-15 for 90 days to serve as the Compliance Enforcement Unit Chief. Developed and implemented plans to modernize the CEU by realigning its mission to current threat reporting, and to enable the unit to address complex criminal violations involving benefit fraud, and exploitations of the Student and Exchange Visitor Program. These efforts resulted in the current structure of the Counterterrorism and Criminal Exploitation Unit (CTCEU).
National Program Manager (GS-1811-14); January 2007 to March 2009
ICE, Homeland Security Investigations, Compliance Enforcement Unit (Headquarters), Washington, DC
Supervisor: (202) 573-5600 (210) 573-5601
- Served as Subject Matter Expert for criminal investigations relating to criminal abuse of the Student and Exchange Visitor Program
- Served as Subject Matter Expert for a ABC Nightly News story concerning vulnerabilities within the nation’s Alien Flight Student Program
- Managed and directed national security cases for field office investigation

Special Agent (GS-1811-5, 7, 9, 11, 12, 13); August 2001 to January 2007
Immigration and Customs Enforcement, Office of the Special Agent in Charge, San Francisco, CA
Supervisor: Group Supervisor: (415) 716-4035 (415) 716-4034
- Initiated, conducted and directed investigations of complex immigration fraud schemes involving facilitators, including undercover operations. Direct a team of investigators in activities such as surveillance, search warrants, and other enforcement operations in order to ensure the success of the investigation.
- Coordinated with and assisted the United States Attorney with prosecution of criminal offenders.
- Recruited and developed cooperating sources of information and witnesses to support criminal investigations.

Immigration Agent (GS-1801-5, 7, 9); September 1997 to August 2001
United States Immigration and Naturalization Service, San Francisco District Office
Supervisor: (415) 516-4000
- Responsible for identifying and interviewing felon inmates of California’s San Quentin State Prison who were amenable to deportation and preparing removal proceedings and/or criminal prosecution.
- Worked with state and local Violent Gang Task Forces to identify, apprehend, remove, and prosecute immigration violators.

EDUCATION

Golden Gate University School of Law, San Francisco California
Doctorate of Jurisprudence; December 2003
- Attended the Evening Program while working professionally with INS and ICE over 50 hours per week
- Dean’s List Student

Saint Anselm College, Manchester New Hampshire
Bachelor of Arts, Liberal Arts; May 1997
Dean’s List Student

HONORS, AWARDS & SPECIAL ACCOMPLISHMENTS

- Massachusetts Bar Association since December 2004
- ICE Assistant Secretary’s, Protecting the Homeland Award, SEVP School Fraud Initiative, August 2008
EDUCATION

**Duke University School of Law, Durham, NC**
Juris Doctor, cum laude, May 2008
GPA: 3.7/4.0
Honors: - Duke Law Journal, Staff Editor
- Jurisprudence Award, Criminal Law (highest grade)

**Brandeis University, Waltham, MA**
Bachelor of Arts in History, magna cum laude, May 2005
Minor in Spanish Language
GPA: 3.87/4.0
Honors: - Phi Beta Kappa, Brandeis University, MA Chapter
- Phi Alpha Theta International Honor Society for History, Brandeis, Alpha Epsilon Omega Chapter

EXPERIENCE

**United States Attorney’s Office, Concord, NH**  Dec. 2012 - Present
Assistant United States Attorney - Criminal Division

Project Safe Childhood (PSC) and Sex Trafficking Coordinator:
- Prosecuted all federal crimes occurring in the District of New Hampshire
- As PSC and Sex Trafficking Coordinator, serve as the USAO point of contact for all child exploitation and sex trafficking investigations and criminal prosecutions
- Primary caseload consists of child exploitation and human trafficking crimes

Law Clerk to the Honorable Jeffrey R. Howard
- Analyzed briefs, prepared bench memoranda, and discussed critical issues with Judge Howard in anticipation of oral arguments
- Attended oral arguments and convened with Judge Howard to consider potential outcomes and propose possible avenues of analysis
- Prepared preliminary draft opinions, involving primarily issues of criminal law
- Reviewed and edited drafts of opinions submitted by other First Circuit judges

**Ropes & Gray LLP, Boston, MA**  Aug. 2008 - Aug. 2011
Associate, Litigation Department (Government Enforcement Group)
- Represented companies under investigation by the U.S. Attorney’s Office, SEC, and Congress, as well as other federal and state authorities
- Participated in all aspects of investigation defense, including document collection and review, preparing for and conducting witness interviews, and preparing memoranda assessing client risks
- Supervised teams of junior associates in conducting multiple internal investigations
- Researched and drafted extensive legal memoranda on various issues, including corporate director and officer liability, and compliance of medical technology clients with the Federal Food, Drug and Cosmetic Act and the Federal Anti-Kickback statute

BAR MEMBERSHIPS

Commonwealth of Massachusetts, 2008
Education:
Lowell High School 1988-1992
BS Business Management Granite State College 2004-2008

Work Experience:
Honorable Discharge
Manchester Police Department 1999-present
Patrol Officer 1999-2008
Street Crime Unit 2008-2009
Patrol Sergeant 2009-2013
Detective Sergeant 2013-2016

Specialized Training:
Basic Drug Investigations, Field Training Officer, Identity Fraud Investigations, Crime Scene Investigations, Officer Related Shootings Investigations, FEMA Courses, Pawn Shop Investigations, NAMI Suicide Prevention Instructor, Human Trafficking Investigations, and Sexual Assault Investigations

Related and Additional Experience:
Chairman of the Greater Manchester Council Against Domestic and Sexual Violence
Chairman of the Hillsborough County North Sexual Assault Resource Team
Member of the Human Trafficking Working Group
Member of the Attorney General’s Human Trafficking Committee
Member of the Attorney General’s Domestic and Sexual Violence Protocol Committee
Member of the State Automated Victim Notification Committee
Member of the American Victim Assistance Program Board Partnership
Detective Sergeant of the Manchester Police Domestic and Sexual Violence
over 8,000 domestic violence cases supervised
over 1,000 sexual assault cases investigated or supervised
over 10 human trafficking cases investigated or supervised
CURRICULUM VITAE

Associate Professor, Department of Criminal Justice
Plymouth State University
Plymouth, NH

135 Fairgrounds Road
Plymouth, NH 03264

Office Phone: 603.535.0700
Home: 603.996.9430
Email: 603.535.0700

EDUCATION

Ph.D., 2008, University of New Hampshire, Sociology with concentrations in Criminology and the Family

Master of Arts, 2004, University of New Hampshire, Sociology

Bachelor of Arts, 2002, Plymouth State University, Sociology

TEACHING EXPERIENCE

Associate Professor, 2006-Present, Department of Criminal Justice, Plymouth State Present University, Plymouth, NH

Teaching and Research Assistant, 2002-2006, Department of Sociology, University of New Hampshire, Durham, NH

CONSULTING


Co-Evaluator, Suicide Prevention Initiative, SAMSHA Grant, Plymouth State University, Fall 2012- Spring 2015.
Research Consultant, Domestic Violence Fatality Review Committee, Bi-Annual Data Report, Data analysis, Created Charts, Tables, Maps and applied report writing, Spring 2014.


Co-Investigator, University of New Hampshire Cooperative Extension, Durham, NH: Evaluation research and internal capacity building for USDA Children Youth and Families At-Risk (CYFAR) funded youth development programs in Hillsboro, Seabrook, Haverhill and Boscawen Schools, 2002-2009.

PROFESSIONAL DEVELOPMENT ACTIVITIES

Bureau of Justice Statistics Program Scholar, 2005, Inter-University Consortium for Political and Social Science Research (ICPSR), University of Michigan, Enrolled in the following classes: Quantitative Analysis of Crime and Criminal Justice Data, Maximum Likelihood Estimation and Matrix Algebra.

TEACHING AREAS/ INTERESTS

Research Methods for Social Sciences; Applied Statistics; Victimology; Women and Crime; Juvenile Delinquency; Family Violence; Crime prevention; Criminology; Supervising student empirical research projects and service learning projects.

RESEARCH AREAS/INTERESTS

Applied research and evaluation; the intersection of juvenile victimization and offending; Child maltreatment; Minor Sex Trafficking; Sexual offender policy; Crime and Analogous Behaviors on College Campuses, Teaching excellence.

REFEREED PUBLICATIONS


NON-REFEREED PUBLICATIONS

**Book Chapters**


**Technical Reports, Research and Evaluation**


REVIEWED PRESENTATIONS


(2009, November 6) Gaining access to law enforcement agencies and records: Trials and tribulations from the field. The American Society of Criminology Annual Meeting, Philadelphia, PA.

(2009, March, 13). The police response to juveniles’ involvement in prostitution: Findings from 6 metropolitan agencies in the U.S. Academy of Criminal Justice Science’s annual meeting, Boston, MA.


(2008, July 29). Law enforcement’s conceptualization of juvenile
PROFESSIONAL ASSOCIATION MEMBERSHIP AND PARTICIPATION

American Evaluation Association, member 2012-present

Academy of Criminal Justice Sciences, member 2009-2010

American Society of Criminology, member 2007-present

OTHER PROFESSIONAL ACTIVITY/SERVICE

Board member, Grafton County Mental Health Court, 2013-2015.

Journal Article Reviewer, Child Maltreatment, 2009 - present

Journal Article Reviewer, Child Abuse and Neglect, 2010 – present


Board member, Whole Village Family Resource Center, Plymouth, NH, Fall 2009 – Spring 2011

Mentor, Circle Program, Plymouth, NH, Fall 2007 – Fall 2009

Vice President, Board of Directors: Orion Prevention Information and Education (OPIE), Newport, NH, 2003-2005

Guardian ad Litem/ Child Advocate: Court Appointed Special Advocate (CASA) of New Hampshire, Plymouth, NH, 1999-2002

SERVICE ACTIVITIES

Criminal Justice Department Service

Chair, CJ Department, Plymouth State University, Spring 2015 – present

Advisor, Criminal Justice Honor Society, Fall 2007 – Present

Search Committee CJ Department, Plymouth State Fall 2013, 2014

Search Committee CJ Department, Chair, Plymouth State, 2012, 2015
NEW HAMPSHIRE HUMAN TRAFFICKING TASK FORCE
PROJECT DIRECTOR
JOB DESCRIPTION

The role of the Project Director is to guide overall efforts in furtherance of the Task Force goal and objectives.

Approximate Time Commitments:
• 35% time dedicated to Task Force management and development including: planning and convening meetings; formalizing MOUs; outreach to engage new members, working with Committees
• 20% time dedicated to development and delivery of training
• 15% time dedicated to protocol development
• 15% collecting and analyzing data, evaluation, working with evaluator
• 15% time dedicated to building the CCR through outreach and supporting service providers through technical assistance

Responsibilities include:
• Provide overall project management and leadership
• Convene monthly meetings including agenda preparation
• Formalize all MOUs
• Guide the development and update of the Task Force protocols
• Assist with the development of the Coordinated Community Response for an effective and customized response to victims of trafficking.
• Oversee the collection, sharing, and reporting of performance measurement data including data entry into TIMS and PMT as appropriate
• Compile and submit required semiannual GMS reports
• Oversee evaluation activities and the work of the Evaluation Consultant.
• Assist with the collection of data and analysis for the process of evaluation.
• Co-facilitate the Community Engagement and Training Committee
• Develop tailored materials for the Training Library
• Deliver stakeholder trainings
• Organize Task Force professional development trainings
• Deliver Task Force professional development training on topics such as confidentiality, immigration benefits for victims, collaboration and multidisciplinary team building, labor trafficking, and others
• Provide management support to other Committees as necessary
• Conduct outreach to expand task force membership
Child and Family Services

POSITION: Case Manager  LOCATION: Manchester/Dover

PROGRAM: RYP  SUPERVISOR: Program Manager

RESPONSIBILITIES/SUMMARY:
The Case Manager will provide intensive case management services to victims of all forms of human trafficking. These victims are likely to represent diverse backgrounds and may include foreign nationals, US citizens, adults, minors, and LGBTQ individuals. Case Manager will work within a coordinated, community-wide system of care to ensure that these victims are connected to the services they need. The work of the Case Manager ensures the provision of wraparound services that meet victims where they are and helps to express their choices while working through the trauma of the situation and interacting with the necessary local and federal partners.

FUNCTIONS/DUTIES:
Essential functions of this position include but are not limited to the following:

▪ Serve as the primary case manager for individuals who have experienced human trafficking. Be the point of contact connecting victims to law enforcement, legal assistance, child welfare, domestic violence services, housing, medical and behavioral health treatment, educational and vocational support, immigrant and refugee services, translation and interpretation services and other services as necessary.

▪ Complete assessment of the victim's needs and develop an individualized service plan tailored to meet these needs.

▪ Utilize a victim centered and trauma informed approach.

▪ Communicate with community service providers as appropriate for coordination.

▪ Build trusting relationships with individuals who access other CFS programs or are referred from other organizations and are suspected to be victims of trafficking.

▪ Participate in outreach efforts in the community to educate and raise awareness of human trafficking and the services available.

▪ Be proficient in the implementation of low-barrier, strength-based, victim centered, and trauma-informed case management.

▪ Assist with the development of program procedures, policies and protocols.

▪ Complete client documentation and maintain paper and electronic files as requested.

▪ Assist with activities of the Human Trafficking Workgroup as assigned.

▪ Participate in agency-wide emergency on-call system.
QUALIFICATIONS:
Bachelor’s Degree in Social Work, Psychology, Sociology, Criminal Justice or related field with at least three years of experience working with vulnerable populations. Experience using a victim centered, trauma informed approach to work with individuals. A thorough knowledge of community resources and demonstrated success in working collaboratively with community-based service providers. Must possess excellent oral and written communication skills, and be able to solve problems independently. Must have good driving record, reliable transportation and liability insurance coverage. Must be available to work a flexible schedule to include some nights and weekends. Bilingual candidates encouraged to apply.

PHYSICAL/MENTAL REQUIREMENTS:
40-hour position working flexible hours. Must be able to travel to community sites including schools, client homes, client work places, service providers, courts, police departments and other community locations. Must be available to work a flexible schedule, meeting the needs of clients seeking services.

EQUIPMENT/TOOLS UTILIZED:
General office equipment, software packages and security cameras. Reliable transportation and acceptable motor vehicle record. Auto insurance at or above the agency’s required liability coverage.
Manchester Police Department
Human Trafficking Investigator/Detective
Position Description/Requirements

Manchester Police Department will assign a Detective with at least 1 year of experience investigating human trafficking and related crimes, and a minimum of 5 years experience in areas such as gang and drug investigations, and/or domestic violence and sexual assault investigations. In addition they will have demonstrated experience and training working with victims of crime including violent crime, employing trauma-informed techniques when working with and interviewing victims, and be well versed in cultivating and maintaining diverse sources of intelligence including but not limited to street and workplace informants.

The assigned Detective will be responsible for proactive investigations of both sex and labor trafficking statewide, will participate on the Law Enforcement Committee, and will provide support and technical assistance for investigations as necessary.
May 9, 2016

U.S. Department of Justice
Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 - Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The Manchester New Hampshire Police Department (MPD) and Child and Family Services of New Hampshire (CFS) are jointly submitting a 2016 Enhanced Collaborative Model to Combat Human Trafficking Task Force grant for your consideration. MPD and CFS have closely collaborated on the preparation and submission of this application on behalf of the New Hampshire Human Trafficking Task Force. The applicants will be assisted by the three other members of the Task Force’s Core Team including ICE, Homeland Security Investigations (HSI), The US Attorney’s Office (USAO/NH), and Give Way To Freedom (GWTF). Together, the Core Team members pledge their continued active partnership with all members of the Task Force in order to realize its mission to develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in New Hampshire while focusing on the goal of developing and enhancing the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

This Letter of Intent affirms the commitment to collaborate between MPD and CFS, as well as all members of the Core Team, for the three-year period beginning October 2016 through September 2019, and beyond.

Additionally, as signaled by the Member Letter of Intent, the Task Force has actively engaged numerous local, state and federal agencies as its members and with support of this grant, if selected, will build a foundation on which to sustain progress well into the future.
Respectfully submitted,

Manchester Police Department

Child and Family Services of New Hampshire

United States Attorney
U.S. Attorney's Office, District of New Hampshire

ICE Homeland Security Investigations, Boston, MA

Give Way To Freedom
NEW HAMPSHIRE HUMAN TRAFFICKING TASK FORCE
ADVISORY COMMITTEE
LETTER OF INTENT

VISION: To end human trafficking in New Hampshire

MISSION: To develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in New Hampshire

DESCRIPTION: The New Hampshire Human Trafficking Task Force is a collaboration of law enforcement, service providers, attorneys, state agencies, and other community stakeholders for the purpose of improving the statewide response to human trafficking. Recognizing the complexity of the issue, as well as a fundamental lack of resources, the Task Force functions as a central hub where interested stakeholders can connect, collaborate, and maximize impact through collective and strategic action. The Task Force is organized around goal of developing and enhancing the multidisciplinary human trafficking response in NHH in a way that implements victim-centered, collaborative, and sustainable approaches to:

1. to identify victims of all forms of trafficking;
2. to investigate cases and prosecute cases at the local, state, and federal levels; and
3. to provide comprehensive, victim-centered and trauma-informed services and support to all survivors - men, women, children, citizens and non-citizens.

Fundamental to the Task Force’s efforts is the understanding that human trafficking impacts vulnerable people and populations, and any true response must include support to prevent and address vulnerability in whatever form it may take.

UNIVERSAL PROVISIONS

We the Undersigned Believe that:

- Human trafficking - both sex and labor - happens in New Hampshire;
- Human trafficking impacts all genders, ages, and nationalities and our response, including investigation, prosecution, services, training, and awareness must be inclusive;
- Collaboration is essential for success;
- Effective investigations, prosecutions, and services are victim-centered and trauma-informed;
- Preventing and responding to human trafficking requires a thoughtful and long-term approach, with policies and actions informed by data and experience;
- Audiences should be empowered with concrete ways they can be part of the response in their personal and/or professional capacity.

We the Undersigned Agree to:

- Work collaboratively on behalf of victims and in furtherance of the Task Force goals by bringing our knowledge, expertise and skills to ensure the use of victim-centered and trauma-informed approaches during investigations and the delivery of services;
- Respect the work and involvement of all members and each discipline’s area of expertise and responsibility;
- Commit to conform to standards of investigating and prosecuting with diligence, integrity, and professionalism while maintaining respect for victims’ rights and dignity;

The Draft Memorandum of Understanding is subject to the awarding of funds under the OJJDP/NSVOC Enhanced Collaborative Task Force Grant. The declarations made herein signal an intent of the parties to enter into a collaborative effort for a period of 3 years beginning in October 2016 should funding be awarded. A final and formal draft detailing individual member commitments shall be developed and signed within 90 days of any award.
- Support Task Force efforts by:
  - Attending regular meetings;
  - Collecting and sharing data;
  - Adhering to policies and protocols drafted and adopted by the Task Force;
  - Participating in the development and distribution of Task Force materials and information as relevant and appropriate;
  - Participating in Task Force outreach events and/or trainings in a capacity that best fits each agency's mission, resources, and expertise;
  - Attending one orientation training delivered by the Core Team

**TASK FORCE STRUCTURE**

**LEADERSHIP**

**CORE TEAM:** The New Hampshire Task Force is led by a Core Team comprised of Manchester Police Department, Child and Family Services of New Hampshire, Give Way to Freedom, the United States Attorney's Office for the District of New Hampshire, and Immigration and Customs Enforcement, Homeland Security Investigations (HSI).

Guiding Principles of the Core Team:
- Core Team agencies are the leaders of the Task Force as a unit.
- The Task Force and its goals comprise a cohesive project, requiring a free flow of information between Core Team agencies, to the greatest extent practicable.
- All Core Team agencies are mutually accountable for the work of the Task Force within their roles, including prosecution of traffickers and protection of victims.
- Core Team agencies are responsible for ensuring that the Task Force is a proactive, results-oriented process that purposefully uses the vehicle of the task force to achieve the goals enumerated in the Enhanced Model.
MEMBERSHIP

We, the undersigned, comprise the NHI Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

<table>
<thead>
<tr>
<th>Organization</th>
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<tr>
<td>Core Team</td>
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<td>Manchester Police Department</td>
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<td>United States Attorney’s Office, District of New Hampshire</td>
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<td>APR 29, 2016</td>
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<td>Immigration and Customs Enforcement, Homeland Security</td>
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<td>Investigations</td>
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<td>Child and Family Services of New Hampshire</td>
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<td>Give Way to Freedom</td>
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<td>Prosecutors</td>
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<tr>
<td>New Hampshire Department of Justice (Attorney General’s Office)</td>
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<tr>
<td>Hillsborough County Prosecutor</td>
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<td>Law Enforcement</td>
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MEMBERSHIP
We the undersigned comprise the NH Human Trafficking Advisory Committee, and agree
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Force Vision, Mission, and Goals.

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<th>Law Enforcement</th>
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<tr>
<td>Nashua Police Department</td>
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| Signature:                   | 5/31/2016 |
| Portsmouth Police Department |       |
| Date:                        | 5/31/2016 |

| Signature:                   | 6/28/2016 |
| Hampton Police Department    |   |
| Date:                        | 6/28/2016 |

| Signature:                   | 5/4/16   |
| Salem Police Department      |     |
| Date:                        | 5/4/16   |

| Signature:                   | 5/5/16   |
| Merrimack County Sheriff's Office | |
| Date:                        | 5/5/16   |

| Signature:                   |          |
| Internet Crimes Against Children Task Force | |
| Date:                        |          |

| Signature:                   |          |
| Civil Enforcement           | |
| Date:                        |          |

| United States Department of Labor, Wage and Hour Division: |
| Signature: | Date: | 5/6/16 |

| United States Department of Labor, Office of the Solicitor |
MEMBERSHIP
We the undersigned comprise the NH Human Trafficking Advisory Committee, and agree to collaborate and adhere to the provisions in this document in furtherance of the Task Force Vision, Mission, and Goals.

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<th>System-Based and State Agencies</th>
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<th>Department of Children, Youth and Families</th>
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<th>Granite State Children's Alliance</th>
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<th>Merrimack County Advocacy Center:</th>
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<th>Crisis Center of Central New Hampshire</th>
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<th>YWCA of Manchester</th>
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<th>International Institute of New England, New Hampshire</th>
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<td>Signature: <em>See Attached Letter</em></td>
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<th>New Hampshire Coalition Against Domestic and Sexual Violence</th>
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<th>Legal Services</th>
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<th>New Hampshire Legal Assistance</th>
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<th>Allied Professionals</th>
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<td>Plymouth State University</td>
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| New Hampshire Restaurant and Lodging Association |
| Faith Based Agencies         |
| Signature:                    | Date:      |
|                               | 5/2/16     |

| Episcopal Church of New Hampshire |
| Signature:                         | Date:      |
|                                   | 5/2/16     |

| Real Life Giving                 |
| Signature:                       | Date:      |
|                                  | 5/5/16     |

| Freedom Café                    |
|                                |
|                                |

Page 6 of 6
May 4, 2016

Dear Attorney General Lynch:

I am writing this letter to inform you that the New Hampshire Department of Health and Human Services, Division for Children, Youth and Families (DCYF) supports the New Hampshire Human Trafficking Task Force application for the Bureau of Justice Assistance (BJA) and the Office for Victims of Crime (OVC) Enhanced Collaborative Task Force Grant to Combat Human Trafficking. We intend to be part of the NH Human Trafficking Coordinated Community Response (CCR) Network. Specifically, DCYF, which includes both juvenile justice and child welfare, will collaborate closely with the Task Force through its advisory committee. The advisory committee will serve as interagency council. With the council, we will develop and implement a coordinated and collaborative, victim-centered, trauma-informed multidisciplinary response to human trafficking in NH.

The number of reported and investigated human trafficking cases has dramatically increased in NH. According to the National Human Trafficking Resource Center, cases have doubled over the past year and include both labor and sex trafficking. With the “National Survey of Drug Use and Health” identifying NH as third highest in the nation for illicit drug and alcohol dependence in 12-17 year olds and first in the nation for 18-25 year olds, the state stands in the midst of substance use disorder crisis. This perpetuates the human trafficking cases that are occurring in this state. The Division for Children, Youth and Families manages protective programs on behalf of New Hampshire's children and youth and their families. DCYF staff provide a wide range of family-centered services with the goal of meeting the needs of parents and their children and strengthening the family system. Services are designed to support families and children in their own homes and communities whenever possible. New Hampshire believes we can enhance our current screening, assessment, treatment and recovery services for our most vulnerable population.

The Preventing Sex Trafficking and Strengthening Families Act, P.L. 113-183, requires title IV-E agencies to develop policies and procedures to identify, document, and determine appropriate services for children who are in placement, care, or supervision of a child welfare agency and who are at risk of becoming sex trafficking victims or who are victims of sex trafficking. The support this grant would bring will allow partners to join with the Department and other stakeholders to leverage existing community resources and initiatives to maximize our collective impact and ensure a comprehensive array of services for all victims of human trafficking in NH.
In order to realize the Task Force mission and goals and sustain our collaborative efforts we recognize, and therefore support this application for funding, the critical and undeniable need for dedicated staff that assures multi-sectorial integration of efforts, central coordination, planning and leadership, and the capacity to build sustainability beyond the life of the grant.

DCYF has been active on the Task Force for a number of years. My staff members and participate in setting priorities in carrying out the Task Force’s strategic plan to improve our response to Human Trafficking in NH. They lead our agencies efforts to develop NH’s child welfare response to Human Trafficking through their participation in the development of the “Attorney General’s Protocols to Combat Human Trafficking”. They work to ensure that DCYF has policy in place to guide staff when responding to victims of Human Trafficking. They worked closely with NH’s Department of Information Technology to design and implement the changes required in our Statewide Automated Child Welfare Information System (SACWIS) to support data collection and reporting on both sex trafficking and labor trafficking. leads the trauma work the DCYF has prioritized as a foundational practice for the next five years. one of the DCYP’s trauma specialists for the state. Their deep understanding of trauma, youth and family needs, and best practices make them ideal candidates to serve on the Task Force.

Thank you for the opportunity to express our commitment to this important work.

Sincerely yours,

Lorraine Bartlett, MSW
Director
NH Division for Children, Youth and Families
May 9, 2016
U.S. Department of Justice
Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 -
Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The issue of human trafficking is a global problem that must be addressed through local action. In New Hampshire, the intersection of the opiate epidemic and human trafficking is especially concerning. The Governor’s Commission on Drug and Alcohol Abuse commits to assisting the New Hampshire Human Trafficking Task Force with its goal of developing and enhancing the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services, by helping to promote capacity building through ongoing outreach to the Substance Use Disorder treatment and recovery community, those we represent, or those we serve.

We are pleased to offer this commitment to help address human trafficking, both sex and labor, to the New Hampshire Human Trafficking Task Force and to the citizens of the State of New Hampshire.

[Signature]
Chairman
May 3, 2016

As a member of the NH Human Trafficking Advisory Committee, we agree to collaborate and adhere to the provisions in the New Hampshire Human Trafficking Task Force Advisory Committee's Memorandum of Understanding in furtherance of the Task Force's vision, mission and goals.

We are eager to continue in our support of the Task Force initiatives to end human trafficking in New Hampshire.

Sincerely,

[Signature]

Program Director
May 5, 2016
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Enhanced Collaborative Model to Combat Human Trafficking
FY 2016 Competitive Solicitation: Purpose Area 1 - Development of Human Trafficking Task Forces

Dear Attorney General Lynch:

The issue of human trafficking is a global problem that must be addressed through local action. This letter affirms The New Hampshire Lodging and Restaurant Association’s intent to be part of the NH Human Trafficking Task Force, to collaborate with the other members in furtherance of the goals, and to adhere to those principles and commitments as stated in the draft MOU.

The New Hampshire Lodging and Restaurant Association has 700 members across the state, and is especially well positioned to support Task Force efforts to train our members on the identification and appropriate reporting of potential labor cases within the hospitality and restaurant industry, as well as sex trafficking cases. We commit to helping the Task Force implement such stakeholder trainings through the allocation of existing resources or facilities towards that effort.

Moreover, in order to realize the Task Force mission and goals and sustain our collaborative efforts we recognize, and therefore support this application for funding, the critical and undeniable need for dedicated staff that assures multi-sectorial integration of efforts, central coordination, planning and leadership, and the capacity to build sustainability beyond the life of the grant.

We are pleased to offer this commitment to help address human trafficking, both sex and labor, to the New Hampshire Human Trafficking Task Force and to the citizens of the State of New Hampshire.

President & CEO
New Hampshire Lodging & Restaurant Association
Human Trafficking (Labor) Interview Questions

- Your name and background with date and where interview was conducted.
- Third-Person interview or notes.
- Question Structure
  - Recruitment/Transport
  - Working and Living Conditions
  - Threats of Harm to You or Family

Recruitment / Transport

- Describe how you were recruited for your work.
  - How did you learn of the job in the U.S.? From whom did you learn?
  - When did you learn of the job?
  - Were you already present in the United States or were you abroad? Please describe.
  - Who were these recruiters?
- What kind of job duties were you recruited to perform?
- What were you told or promised as it related to the job? Promises regarding:
  - How much would you be paid?
  - Hours required to work?
  - Housing and transportation and food provided?
  - Immigration status (green card, work visa)?
- Did you sign a contract with the recruiter?
  - If so, what did the terms of the contract state regarding: pay, hours, housing, transportation, immigration benefits (visa, green card)?
- Did you pay a (recruitment) fee for the position in the United States?
  - If you did pay a fee, how did you obtain the money to pay for the fees? (Borrowed, loans?)
- Did you pay for any other fees to obtain your job? (Travel to the U.S., visa fees, etc.)
- Please describe your transportation from where you were recruited.
  - How did you physically travel? Bus, plane, etc.? Describe.
  - Who paid for this travel?
• Did you travel with anyone else? How many others?
• Did someone meet you in the U.S. and take you to where you would be living and/or working?

[Only if a passport is necessary here]: Did anyone take your passport? Confiscate documents? Please describe

**Working and Living Conditions**

• Describe your working conditions.
  – Describe the type of work you performed. Describe your duties and tasks.
  – How much were you actually paid? Did you receive overtime?
  – Were there any deductions made from your wages? What kinds?

• What were you told the deductions were for?

• How much was your paycheck after all deductions were made?
  – How many hours did you work?
  – Did you receive rest, breaks, lunch, etc?
  – What were the employers’ directions and instructions / rules and policies regarding the job and/or living?

• Describe how you were treated on the job generally.
  – Did your supervisors ever threaten you?

• Physically, with bodily harm? Deportation?

• Describe your living conditions.
  – Where did you live?
  – Were you required to live here? What if you wanted to live elsewhere?
  – Were you able to sleep, did you have enough to eat?

• Were you free to come and go as you please when not working? Please describe.

• Did you or could you complain to anyone about your working conditions and lack of pay?
  – What would happen if you did complain?

• When did you finally leave your employment? How did you leave?

• What were the circumstances of your departure? Where did you go?

• Did you incur a debt to obtain the job or during your work? How much debt did you incur?
- Do you still owe money? To whom?

**Threats of Harm to Victim and Family**

- Since you left your employment, has anyone (manager, owner, and supervisor) tried to contact you? Please describe.
  - Are they trying to locate you? Phone calls, asking or threatening coworkers to find you?
- Have you received threats of harm to you and/or your family? If so, please describe.
  - Do you believe your employer(s) will carry out threats?
- Have you or your family received threats due to any debts you may have?
- Does your employer(s) know where your family lives?
- Do you fear of returning home?
  - What do you fear may happen to you?
  - What could happen to you if did return?
- Do you feel you have suffered emotionally and/or psychologically from this incident? Please describe.
INSTRUCTIONS: The reference column is where you will type the Handbook reference (chapter, section, subsection, and paragraph/line number(s)) you are commenting on. The Comment column is where you will type your comment. If you recommend changing any given statement, please provide the exact language you recommend as replacement. If you recommend adding anything new, please provide the exact language you wish to see added. Leave the Response column blank. The Handbook originator uses this column.

If you use an in-house comment chart, please transfer your data to this chart, leaving the Response column blank.

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Issue Date: TBD
Effective Date: TBD
Superseded: None.
Federal Enterprise Architecture Number: 306-112-002b

1. **Purpose/Background.** This Directive establishes policy and guidelines designed to address potential undue negative consequences derived from participation in child exploitation investigations. U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) is aware of the potential for serious problems resulting from high-risk assignments to child exploitation investigations (CEIs). The unique strains and challenges from these investigations add to the stressors that law enforcement personnel regularly encounter. HSI is committed to providing the care and handling that the men and women who investigate, and support the investigation of, child sexual exploitation crimes deserve. It is the goal of HSI to deliver a resilience program that includes a proactive focus on primary and continual prevention of these stressors, confidential and voluntary assistance to personnel struggling with personal or job-related stressors, and transition services that help ensure a healthy shift when the employee is assigned to another group or to duties that do not include exposure to graphic material. To do this, HSI has created the Awareness and Resilience Mentoring for Operational Readiness (ARMOR) program.


2. **Policy.** It is the policy of HSI to make reasonable efforts to enhance its personnel’s resilience to, and mitigate the risks or potential consequences derived from, continued work in CEIs by complying with this Directive and promoting participation in the ARMOR Program.

3. **Definitions.** The following definitions apply for purposes of this Directive:

   3.1. **Burnout** – Exhaustion of body, mind, and motivation due to exposure to prolonged and unresolved work stress or frustration. Burnout is often a consequence of perceived disparity between the demands of the job and the resources that an employee has available to him or her.¹

¹ Center for Mental Health in Schools & Student/Learning Supports at UCLA, (2018). *What causes burnout?*
3.2. **Child Exploitation** – The act of using a minor child for profit, labor, sexual gratification, or some other personal or financial advantage.

3.3. **Content Impact** – Issues that arise from exposure to child exploitation-related material or to victims of child exploitation.

3.4. **Process Impact** – Issues, such as pressure to cover leads and lack of technology support related to the process of conducting a CEI that result in a sense of urgency and frustration.

3.5. **Resilience** – The process – involving behaviors, thoughts and actions – of adapting well in the face of adversity, trauma, tragedy, threats, or significant sources of stress.

3.6. **Secondary Traumatic Stress** – The emotional distress that results when an individual hears about (or witnesses) the first-hand traumatic experiences of another.

3.6. **Traumatic Stress** – Reactive anxiety or depression following a traumatic event.

3.7. **Unique Stressors** – Atypical events, situations, material, subject matter, etc. that personnel are exposed to in CEI investigations.

3.8. **Vicarious Trauma** – Internal changes in core beliefs, identity, needs/wants, relationships, or views of others as a result of repeated exposure to traumatic material. This may develop into a state of significant tension and preoccupation with perceived perpetrators and with victims’ suffering.

4. **Responsibilities.**

4.1. The **Executive Associate Director of HSI** is responsible for the oversight of the provisions of this Directive.

4.2. The **Assistant Director, Investigative Programs**, is responsible for ensuring the overall implementation of the provisions of this Directive within HSI.

4.3. The **Unit Chief, Child Exploitation Investigations Unit (CEIU)**, is responsible for the implementation of the provisions of this Directive within HSI.

4.4. **HSI Special Agents in Charge (SACs)** are responsible for implementing the provisions of this Directive within their respective areas of responsibility (AORs). In addition, SACs (or their designee) are responsible for nominating a Primary ARMOR Coordinator within their AOR. The selection and nomination must be documented via a memorandum to the National ARMOR Program Manager (NPM). If the nominee is not a currently certified Peer Support Member (PSM), the selectee will apply for Peer Support certification following the formal process outlined in the ICE Peer Support Handbook.
dated December 11, 2017, or as updated. The NPM will ensure that each nominee is vette prior to attending Peer Support certification training. If needed, the SAC, in consultation with the Primary ARMOR Coordinator, will nominate a Secondary ARMOR Coordinator(s) to assist the Primary Coordinator in performing the related duties. The appointment of a Secondary ARMOR Coordinator(s) may be beneficial for Resident Agent in Charge (RAC) offices, satellite offices, or large SAC offices. Primary and Secondary ARMOR Coordinator positions are considered a collateral duty.

4.5. The **National ARMOR Program Manager (NPM)** is responsible for ensuring proper implementation, usage, and coordination of ARMOR and verifying that the Primary and Secondary ARMOR Coordinator nominees meet the requisite qualification standards. The NPM position may be collateral or full-time as needed. The NPM is an HSI employee currently working, or who has worked, as a CEI Case Agent, Forensic Examiner, or Intelligence Research Specialist (IRS). The NPM must have at least three years of criminal investigative or forensic examinations experience in CEI. The NPM must successfully complete the Peer Support Certification Course.

4.6. **ARMOR Coordinators (Primary and/or Secondary)**

The requirements for selection and accreditation for Primary and Secondary ARMOR Coordinators are as follows:

1) Be an HSI Special Agent, Forensic Examiner, IRS, or Victim Assistance Specialist;

2) Possess a high level of credibility among peers;

3) Have successfully completed, or is selected to complete, the PSP Certification Course; and

4) Have at least three years of experience in CEI.

An ARMOR Coordinator (Primary or Secondary) nominee, who does not meet the above prerequisites, may seek a waiver from the NPM through a memorandum justifying an exemption of the requirements.

ARMOR Coordinators are responsible for:

1) Providing a viable network of peer support resources for personnel involved in CEI;

2) Engaging in proactive group outreach efforts with the intention of building and maintaining a pervasive and positive sense of *esprit de corps*;\(^2\)

3) Ensuring that regular ARMOR Musters are conducted with all personnel involved in CEI;

4) Communicating non-attendance to supervisors;

5) Serving as the local informational source regarding Peer Support and ARMOR;

6) Serving as the local information source regarding the Employee Assistance Program (EAP) and its role in ARMOR; and

7) Recruiting employees who are willing and who qualify to attend a Peer Support Certification Course and become members of the Peer Support and ARMOR Programs.

4.7. **Resident Agents in Charge (RACs) and Group Supervisors (GSs)** are responsible for working with the ARMOR Coordinator on the availability and delivery of program services and ensuring that designated employees participate in services as outlined in this Directive including ARMOR Operational Readiness Training, ARMOR Musters, ARMOR Event-Driven Support Services, and ARMOR Transition Training.

4.8. **HSI Special Agents, Computer Forensic Agents, Computer Forensic Analysts, and Intelligence Research Specialists** are responsible for complying with the provisions of this Directive.

5. **Procedures/Requirements.**

5.1. HSI employees engaged in CEI diligently work to counteract the increase in child sex abuse. There is a true sense of urgency in this effort, fueled by a strong desire to apprehend perpetrators, rescue victims, and prevent others from being victimized. Because a successful investigation has tangible results, many employees report that this work is among the most gratifying of their career. This satisfaction and sense of exigency may cause the agency to look past the needs of its employees, or encourage employees to neglect their own well-being as they work to stop perpetrators and rescue those who are defenseless. The Crimes Against Children Research Center found that up to 35% of participants in their study reported problems arising from exposure to CEI-related material, and 40% thought more support services were needed.\(^3\) ARMOR is a key tool in helping employees successfully rescue victims without suffering undue negative consequences.

5.2. ARMOR is a strengths-based health promotion approach designed to identify and accentuate individual and group strengths, mitigate the unique occupational stressors of CEI work, and enhance resilience skill development. It targets stigma and negative help-seeking attitudes associated with acknowledging injury. ARMOR draws on empirical research and on intervention programs designed to assist individuals and groups who are engaged in protracted high-stress operations such as the U.S. Army's “Battlemind

Psychological Debriefings, and courses such as the U.S. Airforce’s “Tools for Health and Resilience in a Virtual Environment (T.H.R.I.V.E)” that recognize, prevent, and mitigate the stress that is associated with witnessing live, high-definition video feeds of violence and death via remote surveillance and combat.

5.3. ARMOR is a program designed to aid personnel directly involved in CEI. It applies, but is not limited, to HSI Special Agents, Computer Forensic Agents, Computer Forensic Analysts, and IRS. Task Force Officers (TFOs) assigned to HSI offices may participate in ARMOR as needed. TFOs whose home agencies do not provide resilience-building services are encouraged to participate in ARMOR. Other ICE employees whose job duties include exposure to CEI may also participate in the program.

5.4. In most cases, ARMOR services are offered at the SAC offices. Employees assigned to a location that is not affiliated with a SAC office will receive services through the nearest SAC office. Employees of the Cyber Crimes Center will receive ARMOR services through the Washington, DC SAC office.

5.5. Unique Stressors – While the tactics and techniques used to investigate child sexual exploitation crimes are similar to those used for investigating almost any other criminal activity, this type of work can carry unique stressors. The stressors that seem central to this investigative arena result from both the process and the content of the work.

5.6. Process Impact – The process of investigating sexual exploitation crimes against children has changed and continues to change, perhaps more rapidly and dynamically than in any other law enforcement specialty. Issues that bring a sense of urgency and frustration include:

1) The need to address leads, make cases, and save live victims;

2) Ever-evolving and often novel investigative approaches and techniques;

3) Dependence on or shortage of technology and IT support personnel with unusually high quantities of data to investigate;

4) Lack of training specific to CEI work;

5) Unusual time demands of online chat, forum, and darknet surveillance; and

6) Inter-jurisdictional and intra-agency cooperation and coordination.

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ARMOR: The Child Exploitation Investigations Resilience Program

2018-ICLI-00046 124
5.7. **Content Impact** – Exposure to explicit material alone is often considered potentially harmful. Studies show that people who view four or more hours of traumatic images per day are more likely to report high levels of acute stress related to the events depicted in the images, and frequent exposure predicted stress symptoms and physical health problems two or three years later. Due to the insidious nature of the crimes that are explicitly demonstrated through images and audio and video files, and the inability of victims to protect themselves, people exposed to the material often report a visceral reaction. Additional factors that can magnify the negative content impact include:

1) Active online social media and/or darknet or telephonic investigations involving role-play and/or solicitation of spontaneous disturbing material and conversations;

2) Interaction/interviews with perpetrators and suspected perpetrators; and

3) Interaction/interviews with minor victims.

5.8. Individuals must exert cognitive and emotional energy to either make sense of or find peace with the callous treatment of children, or to let go of or change, long-held beliefs, and expectations about human and societal behavior.

5.9. As defined in Section 3.5, secondary traumatic stress is the emotional distress that results when an individual hears about (or witnesses) the first-hand traumatic experiences of another. Its symptoms mimic those of post-traumatic stress disorder (PTSD). Accordingly, individuals affected by secondary stress may find themselves re-experiencing personal trauma or notice an increase in arousal and avoidance reactions related to the indirect trauma exposure. They may also experience changes in memory and perception; alterations in their sense of self-efficacy; a depletion of personal resources; and disruption in their perceptions of safety, trust, and independence.

5.10. Participants in studies focusing on exposure to child pornography have reported seeing in their coworkers or experiencing themselves:

1) Personal, family, and marital problems including:

   a) Insomnia;

   b) Depression;

   c) Agitation and distress;

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d) Weight gain;

   e) Hypervigilance around children; and

   f) Decreased marital or sexual satisfaction.

2) Work-related problems including:

   a) Anger;

   b) Loss of objectivity;

   c) Drop in productivity;

   d) Hypersensitivity; and

   e) One-upmanship.

5.11. If an individual struggling with stressors of the job and the resultant problems listed above is unable or unwilling to address the issue, serious syndromes such as burnout and vicarious trauma may result.\textsuperscript{9}

5.12. These conditions can result in great cost to the employee, his or her family, and the agency. The lack of an agency’s acknowledgment of the potential for CEI work to have a negative impact may cause a reduction in the number of people willing to engage in the work, and may also negatively impact the quality of the work they do.\textsuperscript{10}

5.13. Safeguards – HSI has codified program-specific activities designed to build on individual and group strengths, and have put in place safeguards designed to manage and mitigate risk. The core of ARMOR is composed of four crucial activities that can positively influence the well-being and resilience of individuals engaged in CEIs:

1) Protective or preventative measures deployed prior to initial exposure to potentially disturbing material when feasible, or as soon as possible following initial exposure when necessary;

2) Regular and mandatory musters for those continually exposed, designed to build and maintain resilience, reduce symptoms if and when they begin to appear, and minimize stigma associated with having undesired reactions and asking for help with them;

3) Response services, including group or individual debriefings, following particularly distressing exposure or whenever requested; and


4) A transition-out plan, including the ability for employees who determine that they need a temporary or permanent break from exposure to disturbing content to request and receive re-assignment of duties without fear of a derogatory notation in their permanent employee record.

5.14. ARMOR is based on research that compiles recommendations for the areas listed above. These recommendations come from actual Special Agents, Officers, and IRSs who have significant experience conducting this type of work. Such studies indicate that the safeguards that best help in mitigating and managing stress are the cultivation of organizational support for this investigative activity and the development and maintenance of a cohesive group environment.  

5.15. Neither ARMOR nor certified members of the program evaluate fitness or make recommendations for involuntary removal from CEI work. The ARMOR Program is designed to be the avenue through which HSI can provide important services that minimize risk and that improve satisfaction, well-being, resilience, and success, and facilitate a healthy transition out when the time comes.

5.16. Nothing in this Directive shall inhibit the ability of management to reassign personnel, cases, or duties as needed to promote the needs of the agency.

5.17. Peer Support – ARMOR is an official extension of the ICE Peer Support Program (PSP).

5.18. The mission of the PSP is to offer assistance and support to all ICE employees and, on a limited basis, to their family members in times of personal need or following critical or traumatic incidents. The PSP’s objective is to minimize trauma and render assistance in an attempt to accelerate normal recovery from abnormal events, some of which are unique to federal law enforcement. Social support from close relationships has been found to play a positive role in mental and physical health responses to trauma.  

5.19. The PSP is a sanctioned program, governed by ICE Policy 1037.1, Peer Support Program, dated February 22, 2013, or as updated, and the ICE Peer Support Program Handbook, dated December 11, 2017, or as updated, that clearly regulate, among other things:

1) Member selection, training, and conduct;

2) Legal aspects, including confidentiality; and


ARMOR: The Child Exploitation Investigations Resilience Program
3) Clinical aspects, including fundamental theories of human resistance, resilience, and recovery, as well as purposes and parameters of sanctioned peer support activity.

(Note: Due to the sensitive nature of the PSP, all personal information of personnel using ARMOR will be treated with the utmost confidentiality and released to others only as allowed by ICE Policy 1037.1, Peer Support Program, dated February 22, 2013, or as updated, and the ICE Peer Support Program Handbook, dated December 11, 2017, or as updated. PSMs who improperly breach confidentiality will be removed from the PSP and may be subject to disciplinary action. PSMs who properly refuse to disclose confidential information will not be subject to any disciplinary action.)

5.20. PSMs who provide ARMOR services must advise of the confidentiality policy at the outset of initial ARMOR activity. In the event that information obtained in the ARMOR setting is subject to disclosure and the situation does not require immediate or emergency action, PSMs must seek consultation from the NPM or the Program Clinical Advisor before divulging such information.

5.21. The objectives of ARMOR are to:

1) Clearly inform all employees associated with CEI work about the nature of investigations prior to entering the field. This includes first- and second-line supervisors as well as those not officially assigned to a CEI Group but who may be exposed to explicit material;

2) Provide all involved personnel, including supervisors, with education and training about possible negative reactions when exposed to CEI material;

3) Encourage bonds among employees, communication among peers, and regulated intermittent physical and mental distancing from case work;

4) Reduce the stigma associated with seeking assistance during stressful events and encourage personnel to help each other deal with potential negative stress reactions;

5) Openly discuss the possibility of adverse reactions;

6) Address isolation among personnel, particularly among IRSs who may have limited information about the progress or closure of cases; and

7) Facilitate a healthy transition, whether permanent or temporary, to duties that do not include exposure to CEI material.

5.22. ARMOR has four official mechanisms to accomplish the stated objectives:

1) ARMOR Operational Readiness Training;

2) ARMOR Time-Driven Resilient Mind Musters;
3) ARMOR Event-Driven Support Services; and

4) ARMOR Transition Training.

5.23. ARMOR Operational Readiness Training – This training is designed to emphasize strengths and increase awareness of unexpected and unpleasant reactions from exposure to graphic content and to prevent harm from exposure and/or reactions. ARMOR Operational Readiness Training will be offered to all current employees newly assigned (or returning) to CEI prior to initial exposure. This includes first- and second-line supervisors newly assigned to engage in, or oversee, CEI work. Training will be provided as soon as possible following initial exposure for newly arriving employees whose preliminary assignment includes exposure, and to employees at RAC offices when exposed to potentially disturbing material. Employees returning to CEI work after extended time away are invited to attend ARMOR Operational Readiness Training prior to, or upon, returning.

1) Other attendees in the training will include the ARMOR Coordinator, and may include the GS, other employees (Special Agents and IRSs) currently engaged in CEI work, other PSMs, and a mental health professional from the EAP. The training will use the following agenda:

a) Newcomers will be provided an overview of the techniques and the material involved in the investigation process.

b) The ARMOR Coordinator will provide information about normal cognitive, emotional, and physical reactions to graphic material or to material that has personal relevance due to content (e.g., age, gender, clothing of victim or location, furniture in the background). The ARMOR Coordinator can refer to the EAP Clinician as needed.

c) Participants will be asked to describe current coping mechanisms for dealing with stress and sources of support (e.g., mindfulness practices, family, religion, exercise).

d) A designated current employee will describe in cautious detail some of the content to which he or she has been exposed, his or her immediate and subsequent reactions to the content, and how the employee dealt with his or her reactions. The case will be vetted by the ARMOR Coordinator prior to the ARMOR Operational Readiness Training session.

e) The ARMOR Coordinator or the EAP Clinician will provide information on self-care behaviors that are known to reduce long-term negative consequences from normal reactions. Such behaviors include maintaining a healthy diet and exercise routine, mindfulness practices, limited alcohol consumption, open communication
about reactions and concerns with a trusted peer, minimizing isolation and increasing group cohesiveness.\textsuperscript{13}

f) Employees who have never been exposed to material will be shown images or files brought in to the training. Material used for ARMOR Operational Readiness Training will be provided by CEIU. The same approved material will be used in all offices. Exposure to material will be conducted in a tiered approach – starting with less egregious material – to illustrate various types of child exploitation image, video, or audio files.

g) All participants in the ARMOR Operational Readiness Training session, including newcomers, will debrief the exposure experience.

h) Participants will discuss how their previously listed coping methods and the methods introduced in agenda item d above can be applied in processing the recent exposure experience.

i) The ARMOR Coordinator will provide information about the ARMOR Program, PSP, and EAP, including specific instructions on how and when to reach out for personal help or group debriefings.

2) The ARMOR Coordinator will contact the newcomers several days after the ARMOR Operational Readiness Training, but before the employee is assigned any child exploitation investigative duties. The purpose of this interaction is to allow the newcomer to share the assimilation of his or her reactions in a confidential setting with a certified PSM, and to develop an understanding that talking with a PSM about any reactions or concerns, or any other personal issue, is confidential and can be helpful.

5.24. ARMOR Time-Driven Resilient Mind Musters – Time-Driven Resilient Mind Musters are conducted, at a minimum, on a quarterly basis. The ARMOR Muster is an extension of the ARMOR Operational Readiness Training, and sessions are designed to address the cumulative effects of prolonged or repeated exposure, reduce isolation, emphasize strengths and successes, increase group communication, and foster support among peers. They are led by the ARMOR Coordinator. The format and content of the ARMOR Muster will vary with each meeting and each group, but the concepts taught in the ARMOR Operational Readiness Training should be referenced. There is no length requirement or location restriction on the meeting. With supervisor (or other appropriate) approval(s), it can take place off-site.

1) Each session will include time when any participant can talk about images or cases that were particularly impactful to him or her. Participants are not required to discuss images or cases. This is not a structured debriefing and a natural flow between cognitive and emotional reactions is encouraged. Complete historical reconstructions

and redundancy should be avoided.\textsuperscript{14} This exercise is not intended to focus on weaknesses or challenges; rather, it will provide a chance for group members to express thoughts or reactions that they may believe should not be shared anywhere else. They can also learn different coping mechanisms from other ARMOR Muster participants. All participants are encouraged to be supportive.

2) At least twice each year the ARMOR Muster will be attended by a licensed mental health professional from the EAP. HSI will require that the clinician have experience working with law enforcement populations and child sex abuse or significant trauma issues. A portion of the meeting will be dedicated to sharing relevant and new information about the unique stressors in this field and coping mechanisms that have been shown to be effective. Mechanisms that have proven effective include diet, exercise, mindfulness, etc. The PSP Clinical Advisor will provide relevant information for the ARMOR Coordinator to share with the group.

3) All employees involved with CEI work are encouraged to attend as many sessions as possible, but must attend no fewer than two sessions each fiscal year. At least one of the required sessions must include the mental health professional. This minimum attendance requirement applies to employees whose full-time assignment is CEI and to employees not specifically assigned to CEI work but who spend over 50% of their time working CEI cases.

4) Supervisors may attend the ARMOR Muster. Supervisors who are exposed to material or who engage in detailed discussions about the abuse details of cases are strongly encouraged to attend or seek assistance through the PSP or EAP. Supervisors and others must understand that a supervisor's attendance at an ARMOR Muster is not for evaluation of employee performance.

5) With supervisory concurrence, employees who have transitioned out of CEI work are eligible to attend the ARMOR Muster.

6) At supervisory/coordinator concurrence, employees not meeting the minimum ARMOR Muster attendance requirements can be mandated to attend the next ARMOR Muster and/or attend a one-on-one consultation with the EAP clinician. This consultation is not considered mental health treatment and no records of the consultation, other than confirmation of attendance, will be maintained. This consultation will not be reported in any background investigation. Failure to meet the minimum attendance is considered a breach of policy and may result in reassignment from CEI work.

5.25. ARMOR Event-Driven Support Services – There are instances where an individual or a group may be subjected to first-hand trauma and may need specialized assistance. Such examples may include a particularly disturbing case with unusually high demands on time and resources, a case whose material included images or sounds that hit particularly


ARMOR: The Child Exploitation Investigations Resilience Program
close to home (clothes on a victim may be the same clothes as an employee’s child’s, abuse event may be similar to an experience an employee had as a child, etc.), execution of a warrant that included use of force or involved loss of life or limb, suicide of a subject or victim, or a hands-on or production case with live victims. In such cases, ARMOR Event-Driven Support Services may be warranted. Services can be delivered in a group or on an individual basis.

1) **Group ARMOR Debriefing** — Supervisors are required to monitor the overall workflow of their reports. This observation should be broadened to include recognizing when a case or cases include particularly egregious acts against children, unusual proximity to employees, direct contact with live victims, violent confrontations, or death of a victim, colleague, or suspect. More than with any other investigative group, supervisors of CEI work should assess the general mood and feel of the groups or individuals they lead. Supervisors should consult with the ARMOR Coordinator, the Peer Support Clinical Advisor, or the EAP to determine if an ARMOR Debriefing is warranted. Supervisors and coordinators are authorized to call the EAP and schedule a debriefing whenever needed.

2) The EAP Clinician is required to have experience working within the law enforcement culture and must be trained in child abuse or related trauma issues. The EAP Clinician will conduct the ARMOR Debriefing following accepted and ethical debriefing procedures.

3) **Event-Driven Individual Assistance.** Employees may be more susceptible to negative consequences of high stress at work when they are experiencing considerable stressors in their personal life. Similarly, unaddressed negative consequences from work can negatively impact an employee’s personal life and interpersonal relationships. Employees are encouraged to seek help for any issue and at any time that they are beginning to feel overwhelmed. Employees can utilize the EAP for free, confidential, professional help without agency involvement or knowledge. Using the EAP to address issues related to CEI work cannot, in and of itself, result in loss of employment, clearance, or ability to carry a service weapon.

4) The PSP is also available. Ultimately, all HSI, Enforcement and Removal Operations, and Management and Administration offices will have certified PSMs. Employees engaged in CEI work can reach out to any PSM in or outside of their group, office, Directorate, or AOR. The ARMOR Coordinator can provide a list of all certified members.

5.26. **ARMOR Transition Training** — HSI has not placed limits on the length of time an employee can conduct CEIs, but is very concerned that exceedingly long tours of duty can have an unhealthy cumulative effect. Many employees involved in CEI work report that they do not want rigid limits and that being forced to leave the work could have its own negative consequence. Some employees have reported not recognizing negative consequences and reporting full satisfaction while working CEI cases for several years, but upon reassignment acknowledging that an earlier transition out may have been
advised. **Employees are strongly encouraged to practice thorough self-monitoring.** Further, employees are encouraged to seek and accept feedback from family, friends, mentors, and trusted coworkers as a valid monitoring tool. A key objective of ARMOR Operational Readiness Training, Resilient Mind Musters, and Event-Driven Support Services is to help employees know when they need a break from CEI work.

1) Employees who determine that continued exposure to graphic CEI material would be detrimental to their well-being can request temporary or permanent reassignment to a different group or to duties in the current group that do not include exposure to material. Employees can make such a request without fear of reprisal, and no derogatory notation will be entered in the employee’s permanent employee record. If timely reassignment to a different investigative group is not feasible, management can exercise discretion in assigning duties within the same group that do not include exposure to CE material.

2) CEI work is highly charged with little to no down-time. Departure from the work, whether as a result of requested separation or routine rotation to a new assignment, can be a difficult transition. Unresolved concerns about changed world-view or perception of self in the community can continue to fester long after exposure ends. ARMOR Transition Training is intended to recognize the good work accomplished and ease reintegration into perceived less significant investigative work.

3) ARMOR Transition Training is conducted by the ARMOR Coordinator or the EAP Clinician. Training can be provided to an individual or a group of individuals. Transition Training will be a collaborative process where employees will be asked to:

   a) Recap the most rewarding and most challenging cases – focusing on investigative experience and case outcome instead of emotional experience;

   b) Consider new tools developed and how those tools will aid in future work;

   c) Examine personal effects of the work, focusing primarily on growth and self-awareness without neglecting normal negative effects;

   d) Develop a plan of action should negative effects continue or have disruptive professional, personal, or interpersonal consequences; and

   e) Set attainable professional, personal, and interpersonal goals for the following year.

4) The ARMOR Coordinator and/or the EAP Clinician will review healthy coping mechanisms such as maintaining a healthy diet and exercise routine, mindfulness practices, limited alcohol consumption, and open communication about residual or recurring concerns with a trusted peer. Transitioning employees will be invited to participate in future ARMOR activities if they believe that they need the association or that they can help others.
6. Recordkeeping.

6.1. Primary ARMOR Coordinators will maintain an accurate, current, and consolidated record of attendance for the four mechanisms as follows:

1) ARMOR Operational Readiness Training;

2) ARMOR Time-Driven Resilient Mind Musters;

3) ARMOR Event-Driven Support Services; and

4) ARMOR Transition Training.

6.2. Due to the mandatory attendance requirements in this Directive, Primary ARMOR Coordinators will make attendance records available to management when requested.

7. Authorities/References.


7.2. Title 5, United States Code (U.S.C.), Section 7901, Health Service Programs.


7.5. 5 C.F.R. § 792, Federal Employees’ Health and Counseling Programs.

7.6. 5 C.F.R. § 2635, Standards of Ethical Conduct for Employees of the Executive Branch.


7.11. ICE Policy Memorandum 17001.1, “Directing Complaints Appropriately to the Joint Intake Center (JIC), the Office of Professional Responsibility (OPR), the Office of the Inspector General (OIG), or Local Management” (November 10, 2010).
7.12. ICE Policy 14011.1, Reporting Guidelines for Significant Incident Reports (SIRs) and Significant Prospective Enforcement Activity Reports (SPEARs) (August 16, 2010).

7.13. ICE Directive 1022.1 (former number: 1-15.0), Table of Offenses and Penalties, and accompanying Guidelines and Instructions on Use of the Table of Offenses and Penalties (December 8, 2006).

8. Attachments. None.

9. No Private Right. This document provides only internal HSI policy guidance, which may be modified, rescinded, or superseded at any time without notice. It is not intended to, does not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any administrative, civil, or criminal matter. Likewise, no limitations are placed by this guidance on the otherwise lawful enforcement or litigative prerogatives of ICE.

Derek N. Benner
Deputy Executive Associate Director and
Senior Official Performing the Duties of the
Executive Associate Director
Homeland Security Investigations
From: #HSI Boston-Management
Sent: 26 Jun 2018 11:01:50 +0000
To: #HSI SAC OFFICES <HSISACOFFICES@ice.dhs.gov>
Cc: 

Have any comment forms back to me by COB July 2.

Thanks,

From: #HSI SAC OFFICES <HSISACOFFICES@ice.dhs.gov>
Sent: Monday, June 25, 2018 4:16 PM
To: #HSI SAC OFFICES <HSISACOFFICES@ice.dhs.gov>

At the request of [Name], Division Chief, Policy, Planning and Records Management Division, the following message is being sent to all Special Agents in Charge. Please disseminate to appropriate personnel.

Attached you will find, for your review and comments, a draft HSI Directive titled ARMOR: The Child Exploitation Investigations Resilience Program.

If providing comments, please use the attached Comment Form. **Negative responses are required.**

Please reply directly to Unit Chief [Name] at [Email] and courtesy copy your AOR’s Operations Manager **NLT COB, July 5, 2018.**

Thank you,

[Name] | Operations Manager
---|---
DHS | ICE | Homeland Security Investigations

Domestic Operations | 500 12th Street, S.W., Washington, D.C. 20536
Office: 202-732-2107 | Cell: 956-592 -2501

2018-ICLI-00046 136


# HSI Directives Comment Form

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Comments provided by (name of SAC Office): Submitted on:

**INSTRUCTIONS:** The reference column is where you will type the Handbook reference (chapter, section, subsection, and paragraph/line number(s)) you are commenting on.

The Comment column is where you will type your comment. If you recommend changing any given statement, please provide the exact language you recommend as replacement. If you recommend adding anything new, please provide the exact language you wish to see added.

Leave the Response column blank. The Handbook originator uses this column.

If you use an in-house comment chart, please transfer your data to this chart, leaving the Response column blank.

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Issue Date: TBD
Effective Date: TBD
Superseded: None.
Federal Enterprise Architecture Number: 306-112-002b

1. **Purpose/Background.** This Directive establishes policy and guidelines designed to address potential undue negative consequences derived from participation in child exploitation investigations. U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) is aware of the potential for serious problems resulting from high-risk assignments to child exploitation investigations (CEIs). The unique strains and challenges from these investigations add to the stressors that law enforcement personnel regularly encounter. HSI is committed to providing the care and handling that the men and women who investigate, and support the investigation of, child sexual exploitation crimes deserve. It is the goal of HSI to deliver a resilience program that includes a proactive focus on primary and continual prevention of these stressors, confidential and voluntary assistance to personnel struggling with personal or job-related stressors, and transition services that help ensure a healthy shift when the employee is assigned to another group or to duties that do not include exposure to graphic material. To do this, HSI has created the Awareness and Resilience Mentoring for Operational Readiness (ARMOR) program.


2. **Policy.** It is the policy of HSI to make reasonable efforts to enhance its personnel’s resilience to, and mitigate the risks or potential consequences derived from, continued work in CEIs by complying with this Directive and promoting participation in the ARMOR Program.

3. **Definitions.** The following definitions apply for purposes of this Directive:

3.1. **Burnout** – Exhaustion of body, mind, and motivation due to exposure to prolonged and unresolved work stress or frustration. Burnout is often a consequence of perceived disparity between the demands of the job and the resources that an employee has available to him or her.¹

¹ Center for Mental Health in Schools & Student/Learning Supports at UCLA, (2018). *What causes burnout?*
3.2. **Child Exploitation** – The act of using a minor child for profit, labor, sexual gratification, or some other personal or financial advantage.

3.3. **Content Impact** – Issues that arise from exposure to child exploitation-related material or to victims of child exploitation.

3.4. **Process Impact** – Issues, such as pressure to cover leads and lack of technology support related to the process of conducting a CEI that result in a sense of urgency and frustration.

3.5. **Resilience** – The process – involving behaviors, thoughts and actions – of adapting well in the face of adversity, trauma, tragedy, threats, or significant sources of stress.

3.6. **Secondary Traumatic Stress** – The emotional distress that results when an individual hears about (or witnesses) the first-hand traumatic experiences of another.

3.6. **Traumatic Stress** – Reactive anxiety or depression following a traumatic event.

3.7. **Unique Stressors** – Atypical events, situations, material, subject matter, etc. that personnel are exposed to in CEI investigations.

3.8. **Vicarious Trauma** – Internal changes in core beliefs, identity, needs/wants, relationships, or views of others as a result of repeated exposure to traumatic material. This may develop into a state of significant tension and preoccupation with perceived perpetrators and with victims’ suffering.

4. **Responsibilities.**

4.1. The **Executive Associate Director of HSI** is responsible for the oversight of the provisions of this Directive.

4.2. The **Assistant Director, Investigative Programs**, is responsible for ensuring the overall implementation of the provisions of this Directive within HSI.

4.3. The **Unit Chief, Child Exploitation Investigations Unit (CEIU)**, is responsible for the implementation of the provisions of this Directive within HSI.

4.4. **HSI Special Agents in Charge (SACs)** are responsible for implementing the provisions of this Directive within their respective areas of responsibility (AORs). In addition, SACs (or their designee) are responsible for nominating a Primary ARMOR Coordinator within their AOR. The selection and nomination must be documented via a memorandum to the National ARMOR Program Manager (NPM). If the nominee is not a currently certified Peer Support Member (PSM), the selectee will apply for Peer Support certification following the formal process outlined in the ICE Peer Support Handbook.
dated December 11, 2017, or as updated. The NPM will ensure that each nominee is vetted prior to attending Peer Support certification training. If needed, the SAC, in consultation with the Primary ARMOR Coordinator, will nominate a Secondary ARMOR Coordinator(s) to assist the Primary Coordinator in performing the related duties. The appointment of a Secondary ARMOR Coordinator(s) may be beneficial for Resident Agent in Charge (RAC) offices, satellite offices, or large SAC offices. Primary and Secondary ARMOR Coordinator positions are considered a collateral duty.

4.5. The National ARMOR Program Manager (NPM) is responsible for ensuring proper implementation, usage, and coordination of ARMOR and verifying that the Primary and Secondary ARMOR Coordinator nominees meet the requisite qualification standards. The NPM position may be collateral or full-time as needed. The NPM is an HSI employee currently working, or who has worked, as a CEI Case Agent, Forensic Examiner, or Intelligence Research Specialist (IRS). The NPM must have at least three years of criminal investigative or forensic examinations experience in CEI. The NPM must successfully complete the Peer Support Certification Course.

4.6. ARMOR Coordinators (Primary and/or Secondary)

The requirements for selection and accreditation for Primary and Secondary ARMOR Coordinators are as follows:

1) Be an HSI Special Agent, Forensic Examiner, IRS, or Victim Assistance Specialist;

2) Possess a high level of credibility among peers;

3) Have successfully completed, or is selected to complete, the PSP Certification Course; and

4) Have at least three years of experience in CEI.

An ARMOR Coordinator (Primary or Secondary) nominee, who does not meet the above prerequisites, may seek a waiver from the NPM through a memorandum justifying an exemption of the requirements.

ARMOR Coordinators are responsible for:

1) Providing a viable network of peer support resources for personnel involved in CEI;

2) Engaging in proactive group outreach efforts with the intention of building and maintaining a pervasive and positive sense of esprit de corps;\(^2\)

3) Ensuring that regular ARMOR Musters are conducted with all personnel involved in CEI;


ARMOR: The Child Exploitation Investigations Resilience Program
4) Communicating non-attendance to supervisors;

5) Serving as the local informational source regarding Peer Support and ARMOR;

6) Serving as the local information source regarding the Employee Assistance Program (EAP) and its role in ARMOR; and

7) Recruiting employees who are willing and who qualify to attend a Peer Support Certification Course and become members of the Peer Support and ARMOR Programs.

4.7. **Resident Agents in Charge (RACs) and Group Supervisors (GSs)** are responsible for working with the ARMOR Coordinator on the availability and delivery of program services and ensuring that designated employees participate in services as outlined in this Directive including ARMOR Operational Readiness Training, ARMOR Musters, ARMOR Event-Driven Support Services, and ARMOR Transition Training.

4.8. **HSI Special Agents, Computer Forensic Agents, Computer Forensic Analysts, and Intelligence Research Specialists** are responsible for complying with the provisions of this Directive.

5. Procedures/Requirements.

5.1. HSI employees engaged in CEI diligently work to counteract the increase in child sex abuse. There is a true sense of urgency in this effort, fueled by a strong desire to apprehend perpetrators, rescue victims, and prevent others from being victimized. Because a successful investigation has tangible results, many employees report that this work is among the most gratifying of their career. This satisfaction and sense of exigency may cause the agency to look past the needs of its employees, or encourage employees to neglect their own well-being as they work to stop perpetrators and rescue those who are defenseless. The Crimes Against Children Research Center found that up to 35% of participants in their study reported problems arising from exposure to CEI-related material, and 40% thought more support services were needed.³ ARMOR is a key tool in helping employees successfully rescue victims without suffering undue negative consequences.

5.2. ARMOR is a strengths-based health promotion approach designed to identify and accentuate individual and group strengths, mitigate the unique occupational stressors of CEI work, and enhance resilience skill development. It targets stigma and negative help-seeking attitudes associated with acknowledging injury. ARMOR draws on empirical research and on intervention programs designed to assist individuals and groups who are engaged in protracted high-stress operations such as the U.S. Army’s “Battlemind

Psychological Debriefings,"⁴ and courses such as the U.S. Airforce’s “Tools for Health and Resilience in a Virtual Environment (T.H.R.I.V.E)”⁵ that recognize, prevent, and mitigate the stress that is associated with witnessing live, high-definition video feeds of violence and death via remote surveillance and combat.

5.3. ARMOR is a program designed to aid personnel directly involved in CEI. It applies, but is not limited, to HSI Special Agents, Computer Forensic Agents, Computer Forensic Analysts, and IRSs. Task Force Officers (TFOs) assigned to HSI offices may participate in ARMOR as needed. TFOs whose home agencies do not provide resilience-building services are encouraged to participate in ARMOR. Other ICE employees whose job duties include exposure to CEI may also participate in the program.

5.4. In most cases, ARMOR services are offered at the SAC offices. Employees assigned to a location that is not affiliated with a SAC office will receive services through the nearest SAC office. Employees of the Cyber Crimes Center will receive ARMOR services through the Washington, DC SAC office.

5.5. Unique Stressors – While the tactics and techniques used to investigate child sexual exploitation crimes are similar to those used for investigating almost any other criminal activity, this type of work can carry unique stressors. The stressors that seem central to this investigative arena result from both the process and the content of the work.

5.6. Process Impact – The process of investigating sexual exploitation crimes against children has changed and continues to change, perhaps more rapidly and dynamically than in any other law enforcement specialty. Issues that bring a sense of urgency and frustration include:

1) The need to address leads, make cases, and save live victims;

2) Ever-evolving and often novel investigative approaches and techniques;

3) Dependence on or shortage of technology and IT support personnel with unusually high quantities of data to investigate;

4) Lack of training specific to CEI work;

5) Unusual time demands of online chat, forum, and darknet surveillance; and

6) Inter-jurisdictional and intra-agency cooperation and coordination.


5.7. **Content Impact** – Exposure to explicit material alone is often considered potentially harmful. Studies show that people who view four or more hours of traumatic images per day are more likely to report high levels of acute stress related to the events depicted in the images, and frequent exposure predicted stress symptoms and physical health problems two or three years later. Due to the insidious nature of the crimes that are explicitly demonstrated through images and audio and video files, and the inability of victims to protect themselves, people exposed to the material often report a visceral reaction. Additional factors that can magnify the negative content impact include:

1) Active online social media and/or darknet or telephonic investigations involving role-play and/or solicitation of spontaneous disturbing material and conversations;

2) Interaction/interviews with perpetrators and suspected perpetrators; and

3) Interaction/interviews with minor victims.

5.8. Individuals must exert cognitive and emotional energy to either make sense of or find peace with the callous treatment of children, or to let go of or change, long-held beliefs, and expectations about human and societal behavior.

5.9. As defined in Section 3.5, secondary traumatic stress is the emotional distress that results when an individual hears about (or witnesses) the first-hand traumatic experiences of another. Its symptoms mimic those of post-traumatic stress disorder (PTSD). Accordingly, individuals affected by secondary stress may find themselves re-experiencing personal trauma or notice an increase in arousal and avoidance reactions related to the indirect trauma exposure. They may also experience changes in memory and perception; alterations in their sense of self-efficacy; a depletion of personal resources; and disruption in their perceptions of safety, trust, and independence.

5.10. Participants in studies focusing on exposure to child pornography have reported seeing in their coworkers or experiencing themselves:

1) Personal, family, and marital problems including:

   a) Insomnia;

   b) Depression;

   c) Agitation and distress;

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d) Weight gain;
e) Hypervigilance around children; and
f) Decreased marital or sexual satisfaction.

2) Work-related problems including:
   a) Anger;
   b) Loss of objectivity;
   c) Drop in productivity;
   d) Hypersensitivity; and
   e) One-upmanship.

5.11. If an individual struggling with stressors of the job and the resultant problems listed above is unable or unwilling to address the issue, serious syndromes such as burnout and vicarious trauma may result.⁹

5.12. These conditions can result in great cost to the employee, his or her family, and the agency. The lack of an agency’s acknowledgment of the potential for CEI work to have a negative impact may cause a reduction in the number of people willing to engage in the work, and may also negatively impact the quality of the work they do.¹⁰

5.13. Safeguards – HSI has codified program-specific activities designed to build on individual and group strengths, and have put in place safeguards designed to manage and mitigate risk. The core of ARMOR is composed of four crucial activities that can positively influence the well-being and resilience of individuals engaged in CEIs:

1) Protective or preventative measures deployed prior to initial exposure to potentially disturbing material when feasible, or as soon as possible following initial exposure when necessary;

2) Regular and mandatory musters for those continually exposed, designed to build and maintain resilience, reduce symptoms if and when they begin to appear, and minimize stigma associated with having undesired reactions and asking for help with them;

3) Response services, including group or individual debriefings, following particularly distressing exposure or whenever requested; and

4) A transition-out plan, including the ability for employees who determine that they need a temporary or permanent break from exposure to disturbing content to request and receive re-assignment of duties without fear of a derogatory notation in their permanent employee record.

5.14. ARMOR is based on research that compiles recommendations for the areas listed above. These recommendations come from actual Special Agents, Officers, and IRSs who have significant experience conducting this type of work. Such studies indicate that the safeguards that best help in mitigating and managing stress are the cultivation of organizational support for this investigative activity and the development and maintenance of a cohesive group environment.\textsuperscript{11}

5.15. Neither ARMOR nor certified members of the program evaluate fitness or make recommendations for involuntary removal from CEI work. The ARMOR Program is designed to be the avenue through which HSI can provide important services that minimize risk and that improve satisfaction, well-being, resilience, and success, and facilitate a healthy transition out when the time comes.

5.16. Nothing in this Directive shall inhibit the ability of management to reassign personnel, cases, or duties as needed to promote the needs of the agency.

5.17. Peer Support – ARMOR is an official extension of the ICE Peer Support Program (PSP).

5.18. The mission of the PSP is to offer assistance and support to all ICE employees and, on a limited basis, to their family members in times of personal need or following critical or traumatic incidents. The PSP’s objective is to minimize trauma and render assistance in an attempt to accelerate normal recovery from abnormal events, some of which are unique to federal law enforcement. Social support from close relationships has been found to play a positive role in mental and physical health responses to trauma.\textsuperscript{12}

5.19. The PSP is a sanctioned program, governed by ICE Policy 1037.1, Peer Support Program, dated February 22, 2013, or as updated, and the ICE Peer Support Program Handbook, dated December 11, 2017, or as updated, that clearly regulate, among other things:

1) Member selection, training, and conduct;

2) Legal aspects, including confidentiality; and


ARMOR: The Child Exploitation Investigations Resilience Program
3) Clinical aspects, including fundamental theories of human resistance, resilience, and recovery, as well as purposes and parameters of sanctioned peer support activity.

(Note: Due to the sensitive nature of the PSP, all personal information of personnel using ARMOR will be treated with the utmost confidentiality and released to others only as allowed by ICE Policy 1037.1, Peer Support Program, dated February 22, 2013, or as updated, and the ICE Peer Support Program Handbook, dated December 11, 2017, or as updated. PSMs who improperly breach confidentiality will be removed from the PSP and may be subject to disciplinary action. PSMs who properly refuse to disclose confidential information will not be subject to any disciplinary action.)

5.20. PSMs who provide ARMOR services must advise of the confidentiality policy at the outset of initial ARMOR activity. In the event that information obtained in the ARMOR setting is subject to disclosure and the situation does not require immediate or emergency action, PSMs must seek consultation from the NPM or the Program Clinical Advisor before divulging such information.

5.21. The objectives of ARMOR are to:

1) Clearly inform all employees associated with CEI work about the nature of investigations prior to entering the field. This includes first- and second-line supervisors as well as those not officially assigned to a CEI Group but who may be exposed to explicit material;

2) Provide all involved personnel, including supervisors, with education and training about possible negative reactions when exposed to CEI material;

3) Encourage bonds among employees, communication among peers, and regulated intermittent physical and mental distancing from case work;

4) Reduce the stigma associated with seeking assistance during stressful events and encourage personnel to help each other deal with potential negative stress reactions;

5) Openly discuss the possibility of adverse reactions;

6) Address isolation among personnel, particularly among IRSs who may have limited information about the progress or closure of cases; and

7) Facilitate a healthy transition, whether permanent or temporary, to duties that do not include exposure to CEI material.

5.22. ARMOR has four official mechanisms to accomplish the stated objectives:

1) ARMOR Operational Readiness Training;

2) ARMOR Time-Driven Resilient Mind Musters;
3) ARMOR Event-Driven Support Services; and

4) ARMOR Transition Training.

5.23. ARMOR Operational Readiness Training – This training is designed to emphasize strengths and increase awareness of unexpected and unpleasant reactions from exposure to graphic content and to prevent harm from exposure and/or reactions. ARMOR Operational Readiness Training will be offered to all current employees newly assigned (or returning) to CEI prior to initial exposure. This includes first- and second-line supervisors newly assigned to engage in, or oversee, CEI work. Training will be provided as soon as possible following initial exposure for newly arriving employees whose preliminary assignment includes exposure, and to employees at RAC offices when exposed to potentially disturbing material. Employees returning to CEI work after extended time away are invited to attend ARMOR Operational Readiness Training prior to, or upon, returning.

1) Other attendees in the training will include the ARMOR Coordinator, and may include the GS, other employees (Special Agents and IRSs) currently engaged in CEI work, other PSMs, and a mental health professional from the EAP. The training will use the following agenda:

   a) Newcomers will be provided an overview of the techniques and the material involved in the investigation process.

   b) The ARMOR Coordinator will provide information about normal cognitive, emotional, and physical reactions to graphic material or to material that has personal relevance due to content (e.g., age, gender, clothing of victim or location, furniture in the background). The ARMOR Coordinator can refer to the EAP Clinician as needed.

   c) Participants will be asked to describe current coping mechanisms for dealing with stress and sources of support (e.g., mindfulness practices, family, religion, exercise).

   d) A designated current employee will describe in cautious detail some of the content to which he or she has been exposed, his or her immediate and subsequent reactions to the content, and how the employee dealt with his or her reactions. The case will be vetted by the ARMOR Coordinator prior to the ARMOR Operational Readiness Training session.

   e) The ARMOR Coordinator or the EAP Clinician will provide information on self-care behaviors that are known to reduce long-term negative consequences from normal reactions. Such behaviors include maintaining a healthy diet and exercise routine, mindfulness practices, limited alcohol consumption, open communication...
about reactions and concerns with a trusted peer, minimizing isolation and increasing group cohesiveness.\textsuperscript{13}

f) Employees who have never been exposed to material will be shown images or files brought in to the training. Material used for ARMOR Operational Readiness Training will be provided by CEIU. The same approved material will be used in all offices. Exposure to material will be conducted in a tiered approach – starting with less egregious material – to illustrate various types of child exploitation image, video, or audio files.

g) All participants in the ARMOR Operational Readiness Training session, including newcomers, will debrief the exposure experience.

h) Participants will discuss how their previously listed coping methods and the methods introduced in agenda item d above can be applied in processing the recent exposure experience.

i) The ARMOR Coordinator will provide information about the ARMOR Program, PSP, and EAP, including specific instructions on how and when to reach out for personal help or group debriefings.

2) The ARMOR Coordinator will contact the newcomers several days after the ARMOR Operational Readiness Training, but before the employee is assigned any child exploitation investigative duties. The purpose of this interaction is to allow the newcomer to share the assimilation of his or her reactions in a confidential setting with a certified PSM, and to develop an understanding that talking with a PSM about any reactions or concerns, or any other personal issue, is confidential and can be helpful.

5.24. **ARMOR Time-Driven Resilient Mind Musters** – Time-Driven Resilient Mind Musters are conducted, at a minimum, on a quarterly basis. The ARMOR Muster is an extension of the ARMOR Operational Readiness Training, and sessions are designed to address the cumulative effects of prolonged or repeated exposure, reduce isolation, emphasize strengths and successes, increase group communication, and foster support among peers. They are led by the ARMOR Coordinator. The format and content of the ARMOR Muster will vary with each meeting and each group, but the concepts taught in the ARMOR Operational Readiness Training should be referenced. There is no length requirement or location restriction on the meeting. With supervisor (or other appropriate) approval(s), it can take place off-site.

1) Each session will include time when any participant can talk about images or cases that were particularly impactful to him or her. Participants are not required to discuss images or cases. This is not a structured debriefing and a natural flow between cognitive and emotional reactions is encouraged. Complete historical reconstructions

and redundancy should be avoided. This exercise is not intended to focus on weaknesses or challenges; rather, it will provide a chance for group members to express thoughts or reactions that they may believe should not be shared anywhere else. They can also learn different coping mechanisms from other ARMOR Muster participants. All participants are encouraged to be supportive.

2) At least twice each year the ARMOR Muster will be attended by a licensed mental health professional from the EAP. HSI will require that the clinician have experience working with law enforcement populations and child sex abuse or significant trauma issues. A portion of the meeting will be dedicated to sharing relevant and new information about the unique stressors in this field and coping mechanisms that have been shown to be effective. Mechanisms that have proven effective include diet, exercise, mindfulness, etc. The PSP Clinical Advisor will provide relevant information for the ARMOR Coordinator to share with the group.

3) All employees involved with CEI work are encouraged to attend as many sessions as possible, but must attend no fewer than two sessions each fiscal year. At least one of the required sessions must include the mental health professional. This minimum attendance requirement applies to employees whose full-time assignment is CEI and to employees not specifically assigned to CEI work but who spend over 50% of their time working CEI cases.

4) Supervisors may attend the ARMOR Muster. Supervisors who are exposed to material or who engage in detailed discussions about the abuse details of cases are strongly encouraged to attend or seek assistance through the PSP or EAP. Supervisors and others must understand that a supervisor’s attendance at an ARMOR Muster is not for evaluation of employee performance.

5) With supervisory concurrence, employees who have transitioned out of CEI work are eligible to attend the ARMOR Muster.

6) At supervisory/coordinator concurrence, employees not meeting the minimum ARMOR Muster attendance requirements can be mandated to attend the next ARMOR Muster and/or attend a one-on-one consultation with the EAP clinician. This consultation is not considered mental health treatment and no records of the consultation, other than confirmation of attendance, will be maintained. This consultation will not be reported in any background investigation. Failure to meet the minimum attendance is considered a breach of policy and may result in reassignment from CEI work.

5.25. ARMOR Event-Driven Support Services — There are instances where an individual or a group may be subjected to first-hand trauma and may need specialized assistance. Such examples may include a particularly disturbing case with unusually high demands on time and resources, a case whose material included images or sounds that hit particularly

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close to home (clothes on a victim may be the same clothes as an employee’s child’s, abuse event may be similar to an experience an employee had as a child, etc.), execution of a warrant that included use of force or involved loss of life or limb, suicide of a subject or victim, or a hands-on or production case with live victims. In such cases, ARMOR Event-Driven Support Services may be warranted. Services can be delivered in a group or on an individual basis.

1) **Group ARMOR Debriefing** — Supervisors are required to monitor the overall workflow of their reports. This observation should be broadened to include recognizing when a case or cases include particularly egregious acts again children, unusual proximity to employees, direct contact with live victims, violent confrontations, or death of a victim, colleague, or suspect. More than with any other investigative group, supervisors of CEI work should assess the general mood and feel of the groups or individuals they lead. Supervisors should consult with the ARMOR Coordinator, the Peer Support Clinical Advisor, or the EAP to determine if an ARMOR Debriefing is warranted. Supervisors and coordinators are authorized to call the EAP and schedule a debriefing whenever needed.

2) The EAP Clinician is required to have experience working within the law enforcement culture and must be trained in child abuse or related trauma issues. The EAP Clinician will conduct the ARMOR Debriefing following accepted and ethical debriefing procedures.

3) **Event-Driven Individual Assistance.** Employees may be more susceptible to negative consequences of high stress at work when they are experiencing considerable stressors in their personal life. Similarly, unaddressed negative consequences from work can negatively impact an employee’s personal life and interpersonal relationships. Employees are encouraged to seek help for any issue and at any time that they are beginning to feel overwhelmed. Employees can utilize the EAP for free, confidential, professional help without agency involvement or knowledge. Using the EAP to address issues related to CEI work cannot, in and of itself, result in loss of employment, clearance, or ability to carry a service weapon.

4) The PSP is also available. Ultimately, all HSI, Enforcement and Removal Operations, and Management and Administration offices will have certified PSMs. Employees engaged in CEI work can reach out to any PSM in or outside of their group, office, Directorate, or AOR. The ARMOR Coordinator can provide a list of all certified members.

5.26. ARMOR Transition Training — HSI has not placed limits on the length of time an employee can conduct CEIs, but is very concerned that exceedingly long tours of duty can have an unhealthy cumulative effect. Many employees involved in CEI work report that they do not want rigid limits and that being forced to leave the work could have its own negative consequence. Some employees have reported not recognizing negative consequences and reporting full satisfaction while working CEI cases for several years, but upon reassignment acknowledging that an earlier transition out may have been
advised. Employees are strongly encouraged to practice thorough self-monitoring. Further, employees are encouraged to seek and accept feedback from family, friends, mentors, and trusted coworkers as a valid monitoring tool. A key objective of ARMOR Operational Readiness Training, Resilient Mind Musters, and Event-Driven Support Services is to help employees know when they need a break from CEI work.

1) Employees who determine that continued exposure to graphic CEI material would be detrimental to their well-being can request temporary or permanent reassignment to a different group or to duties in the current group that do not include exposure to material. Employees can make such a request without fear of reprisal, and no derogatory notation will be entered in the employee’s permanent employee record. If timely reassignment to a different investigative group is not feasible, management can exercise discretion in assigning duties within the same group that do not include exposure to CE material.

2) CEI work is highly charged with little to no down-time. Departure from the work, whether as a result of requested separation or routine rotation to a new assignment, can be a difficult transition. Unresolved concerns about changed world-view or perception of self in the community can continue to fester long after exposure ends. ARMOR Transition Training is intended to recognize the good work accomplished and ease reintegration into perceived less significant investigative work.

3) ARMOR Transition Training is conducted by the ARMOR Coordinator or the EAP Clinician. Training can be provided to an individual or a group of individuals. Transition Training will be a collaborative process where employees will be asked to:

   a) Recap the most rewarding and most challenging cases – focusing on investigative experience and case outcome instead of emotional experience;
   b) Consider new tools developed and how those tools will aid in future work;
   c) Examine personal effects of the work, focusing primarily on growth and self-awareness without neglecting normal negative effects;
   d) Develop a plan of action should negative effects continue or have disruptive professional, personal, or interpersonal consequences; and
   e) Set attainable professional, personal, and interpersonal goals for the following year.

4) The ARMOR Coordinator and/or the EAP Clinician will review healthy coping mechanisms such as maintaining a healthy diet and exercise routine, mindfulness practices, limited alcohol consumption, and open communication about residual or recurring concerns with a trusted peer. Transitioning employees will be invited to participate in future ARMOR activities if they believe that they need the association or that they can help others.
6. **Recordkeeping.**

6.1. Primary ARMOR Coordinators will maintain an accurate, current, and consolidated record of attendance for the four mechanisms as follows:

1) ARMOR Operational Readiness Training;

2) ARMOR Time-Driven Resilient Mind Musters;

3) ARMOR Event-Driven Support Services; and

4) ARMOR Transition Training.

6.2. Due to the mandatory attendance requirements in this Directive, Primary ARMOR Coordinators will make attendance records available to management when requested.

7. **Authorities/References.**


7.2. Title 5, United States Code (U.S.C.), Section 7901, Health Service Programs.


7.5. 5 C.F.R. § 792, Federal Employees’ Health and Counseling Programs.

7.6. 5 C.F.R. § 2635, Standards of Ethical Conduct for Employees of the Executive Branch.


7.11. ICE Policy Memorandum 17001.1, “Directing Complaints Appropriately to the Joint Intake Center (JIC), the Office of Professional Responsibility (OPR), the Office of the Inspector General (OIG), or Local Management” (November 10, 2010).
7.12. ICE Policy 14011.1, Reporting Guidelines for Significant Incident Reports (SIRs) and Significant Prospective Enforcement Activity Reports (SPEARs) (August 16, 2010).

7.13. ICE Directive 1022.1 (former number: 1-15.0), Table of Offenses and Penalties, and accompanying Guidelines and Instructions on Use of the Table of Offenses and Penalties (December 8, 2006).

8. Attachments. None.

9. No Private Right. This document provides only internal HSI policy guidance, which may be modified, rescinded, or superseded at any time without notice. It is not intended to, does not, and may not be relied upon to create any right or benefit, substantive or procedural, enforceable at law by any party in any administrative, civil, or criminal matter. Likewise, no limitations are placed by this guidance on the otherwise lawful enforcement or litigative prerogatives of ICE.

Derek N. Benner  
Deputy Executive Associate Director and  
Senior Official Performing the Duties of the  
Executive Associate Director  
Homeland Security Investigations
Advanced Human Trafficking Investigations
Law Enforcement Course

November 28 - 30, 2018
Time: 8AM-5PM

Location
Charleston County
Sheriff's Department
Leeds Ave
North Charleston, SC 29405

Topics Covered

- Human Trafficking - Culture - Mindset
- Identifying Human Trafficking Crimes
- Creating a Systematic Approach to Human Trafficking Investigations
- Proactive Human Trafficking Investigations
- Importance of Evidence Collection
- Tools and Techniques for Human Trafficking Operations & Investigations with Training Lab
- Resources for Law Enforcement to Help Investigate Human Trafficking - Training Lab
- Victimology
- Illicit Massage Businesses - Sex and Labor Trafficking
- Labor Trafficking
- Identifying and Interviewing Human Trafficking Victims
- Trauma-Informed & Victim Centered Approach
- Community Education and Engagement

24 hours of Continuing Law Enforcement Education (CLEE)

Course Purpose

This course will provide law enforcement officers with operational tools and techniques that will allow them to proactively identify and investigate human trafficking while understanding the importance of a victim-centered and trauma-informed methodology.

Who Should Attend

Local, State, and Federal Law Enforcement, Tribal Police, and Prosecutors.
This course is not open to the general public.

Instructors

Major
Raleigh Police Department, Retired

QMHP, MPP
Anti-Human Trafficking Advocate

Special Agent
ICE/HSI, Retired

Enrollment Question
Phone: 800.819.7787
Email: HelpERASE.org

Registration Link

HelpERASE.org
ABOUT US

ERASE Child Trafficking is a U.S. based organization with global impact. We are focused on eliminating child trafficking by implementing a holistic approach, from education and recovery to life reclamation.

ERASE’s mission is to be a unifying voice creating a cultural shift in the perception of child trafficking, working towards its eradication by empowering action against this inhumanity through education, recovery and life reclamation.
WHY ERASE OFFERS HUMAN TRAFFICKING TRAINING TO LAW ENFORCEMENT

Human Trafficking is the fastest-growing business of organized crime. Trends and patterns are constantly training. Most law enforcement agencies do not have policy and procedures in place for investigating human trafficking crimes.

Law enforcement officers are on the front lines of this battle. Patrol officers are often the first to come in contact with victims of human trafficking. Victims rarely self-report due to fear or not identify themselves as victims, we rely on police officers to step in and help. After identifying victims, detectives or agents need to know how to investigate these crimes while using a victim-centered approach.

Our training takes officers through the steps of identifying, investigating and building prosecutable cases.
TRAFFICKING NUMBERS

2nd / 27 / 1 / 150.2

Second largest and fastest growing criminal enterprise

27 million victims

1 million children exploited in commercial sex every year

$150.2 billion dollars generated worldwide
TRAFFICKING NUMBERS

12-14 is the average age that U.S. kids are first pulled into commercial sex.

83% of sex trafficking victims found in the U.S. were U.S. citizens.

Between 1.6 and 2.6 million youth run away each year.
COURSE PURPOSE

This course will provide law enforcement officers with operational tools and practices that will allow them to proactively identify and investigating human trafficking while understanding the importance of a **victim-centered** and **trauma-informed methodology**.

COURSE DESCRIPTION

This course provides attendees with an overview of Human Trafficking crimes, as defined in the U.S. Trafficking Victims Protection Act of 2000 (TVPA) and state laws. Case analysis and development is discussed, as well as the legal and investigative elements of Human Trafficking crimes. A victim-centered approach to proactive investigations and effective approaches to interviewing victims is introduced. Pre and post-operational planning are also covered. Additionally, participants will understand the importance of utilizing digital evidence and technologies when investigating Human Trafficking crimes.
COURSE OBJECTIVES

By the end of the course, through the course manual, materials and instructor presentations, the attendees will know:

- Indicators of Human Trafficking specific to their area.
- The importance of using a victim-centered approach when working with victims of Human Trafficking.
- Various concepts and methods on how to identify and interview victims of Human Trafficking.
- Available resources to investigate Human Trafficking crimes.
- How to develop a case after receiving a tip about Human Trafficking.
- The importance of proactive investigations.
- Government benefits and protections for victims of Human Trafficking.
- Technologies available to identify Human Trafficking Victims.
- The importance of community education, engagement, and creating a community task force.
COURSE AGENDA

Day 1
0800-0815 Opening remarks
0815-0915 Culture and Mindset
Where does Human Trafficking start?
0915-0930 Class Objectives and Introduction
0930-0945 Break
0945-1050 HT Practices and Principles
1100-1200 HT Practices and Principles
1200-1300 Lunch

1300-1330 Exercise - Choices
1330-1430 Federal/State HT Law
1430-1445 Break
1445-1550 Victimology
1550-1600 Break
1600-1700 Spotlight, Website Review and Related Technology

Day 2
0800-0815 Day 1 Review
0815-0915 Understanding HT Victims/Trauma
0915-0930 Break
0930-1200 Tools and Techniques for HT Operations - Investigations With Training Lab
1200-1300 Lunch

1300-1315 Tunnel Vision
1315-1430 Drugs as a Form of Coercion
1430-1445 Break
1445-1550 Combining Public Health and Public Safety Strategies to combat HT
1600-1700 Victim Centered Approach

Day 3
0800-0850 Massage Parlors: IMBs
0900-1000 Human Trafficking Advocate Speaker
1000-1010 Break
1010-1030 What Does Trauma Look Like
1030-1200 Training Lab
1200-1300 Lunch in class

1300-1450 HT Case Development and Investigative Procedures
1500-1550 DHS Programs : HSTC/APAN Importance of a Task Force
1600-1700 Local Resources - Closing Remarks Participant feedback

- Additional Case Study-Digital Evidence Sources
- Preservations Letters, Court Orders DHS Film: Web of Lies, Labor Trafficking
- Practical Exercise: Use host agency paperwork and write Op Plan for Demand or Supply Operation
- Agenda Subject to Change
INSTRUCTORS

Major [Redacted]
Raleigh Police Department, Retired

Major Hoffman is a 24-year veteran of the Raleigh Police Department. He worked in all divisions of the Raleigh Police Department and was assigned to work at the District Attorney’s Office as an investigator. He is a certified police instructor with 17 years of experience and still regularly trains officers.

While supervising the Raleigh Intelligence Center, he focused on developing a consistent and proactive response to Human Trafficking cases. He served as the Human Trafficking Coordinator for the Raleigh Police Department and supervised operations that included Anti-Human Trafficking Operations. He continues to plan and collaborate with other law enforcement agencies and victim service providers to address Human Trafficking.

Major Hoffman is a native Spanish speaker which allows him to conduct outreach and impact Spanish speaking victims of Human Trafficking. He regularly assists with public awareness events and is a member of the Rapid Response Team in Raleigh.

He has a passion for developing collaborative Anti-Human Trafficking Operations that reinforce the need for local, state, and federal law enforcement agencies to collaborate.

Special Agent [Redacted]
ICE/HSI, Retired

Retired Special Agent Volk was a member of the Department of Homeland Security Investigations is a respected figure in law enforcement with over 30 years of domestic and international experience. In 1991, he joined the U.S. Customs Service, which later became the Department of Homeland Security, Immigration and Customs Enforcement in 2003 as a result of the horrific events of 9/11/2001.

In February 2011, he was assigned to the Office of the Special Agent in Charge Miami, Human Trafficking Group and was the Coordinator for the South Florida Human Trafficking Task Force (SFHTTF) until December 2017 when he retired. He worked many Human Trafficking cases with other local, state, and federal law enforcement agencies with the assistance of non-governmental organizations, faith-based organizations and local and state government agencies.

As an instructor, presenter or class coordinator, he traveled to the International Law Enforcement Academies in Hungary, Botswana, and Vietnam. In this capacity, he educated international law enforcement officers from all over the world on the prevention of Human Trafficking, protection of victims and prosecution of human traffickers. He also assisted the Bahamian and Jamaican Police Departments and Prosecuting Attorneys establish their own Human Trafficking programs. He regularly presents to local police departments, universities, high schools and community organizations.
INSTRUCTORS

DMHP, MPP
Human Trafficking Advocate

2015 Presidential Management Fellow, who rotated throughout the Federal Government, working at both The Department of Health and Human Services - Office on Trafficking in Persons (OTIP) and The Human Smuggling and Trafficking Center.

While at the Office on Trafficking in Persons, Lori helped stand up the National Human Trafficking Training and Technical Assistance Center and develop new public awareness materials for the "Look Beneath the Surface" campaign. At the Human Smuggling and Trafficking Center, an Inter-agency effort, she stood up The Human Trafficking Community of Interest which unified partners against human trafficking through web-based tools, interactive communication, & real-time information sharing.

Currently working at the Department of Homeland Security Headquarters Chief Financial Office, where she manages the Immigration and Borders portfolio consisting of Immigration Customs Enforcement (ICE) and The United States Citizenship and Immigration Services (USCIS).

Holds a Bachelor’s in Criminology, Law, and Society with a concentration in Conflict Analysis & Resolution and a Master’s in Public Policy with a concentration in Terrorism, Transnational Crime, and Corruption from George Mason University.

Has been an advocate for vulnerable populations for well over a decade serving victims/survivors and building capacity in the areas of domestic violence, human trafficking, mental health, and at-risk youth. Lori is a qualified mental health professional in the state of Virginia. The 2016 Winter Edition of The George Mason Spirit Magazine published an article highlighting Lori’s work with vulnerable populations and dedication to serving her community. Lori is active in the field of domestic sex trafficking where she volunteers and supports local initiatives including being an acting-board member of Amara-legal, a law firm dedicated to helping victims of trafficking obtain record expungements. She strongly believes that each individual should be afforded the opportunity to succeed.
For Additional Information Contact

Executive Director

ChildTrafficking.org

800-819-
The course is Nov 28-30. Attached is some information about the course.

From: [Redacted]
Sent: Thursday, October 11, 2018 3:00 PM
Subject: HT LE Class

Good Afternoon,
I hope everyone is doing well. Thank you for taking the time to meet with us last week in preparation for the upcoming class. Thank you for coordinating the meetings last week and your support for our training.

Our goal is to deliver a class that helps you make high-impact human trafficking cases. Below is an email that has the information about the class for the participants. This would go to those who you would want to attend the class. Within the email is the registration link. This class is for law enforcement only as some material is Law Enforcement Sensitive. There will be a few guest speakers that will be coordinating.

Prior to the class starting, we will send out an email to the participants with the logistics of the class, i.e., parking, what to bring to the class, and the agenda.

Please feel free to reach out with any questions or concerns.

**********Copy and Paste Email**********

All,
The Tri-County Human Trafficking Task Force will be hosting a three-day training course titled: Advanced Human Trafficking Investigations Law Enforcement Course - 24 hours of Continuing Law Enforcement Education (CLEE).

ERASE Child Trafficking will be presenting the course with Instructors [Redacted], Raleigh Police Department Retired, [Redacted], QMHP, MPP, and Special Agent [Redacted], ICE/HSI Retired.

There is NO COST to the participant to attend this course. Please see attachments for description and details.
Audience:
Local Law Enforcement, State, Federal, Tribal Police, and Prosecutors.
This class is not open to the public.

Location:
Charleston County Sheriff's Department
3691 Leeds Ave
North Charleston, SC 29405

Session:
November 28 - 30, 2018
8:00 A.M - 5:00 P.M

Complete registration online by following the link below:
https://www.erasechildtrafficking.org/human-trafficking-training-for-law-enforcement

Regards,

Executive Director
800.819.9207
917.573.8080
EraseChildTrafficking.org
A Non Profit - 501(c)(3) Organization
Advanced Human Trafficking Investigations
Law Enforcement Course

November 28 - 30, 2018
Time: 8AM-5PM

Location
Charleston County
Sheriff’s Department
Leeds Ave
North Charleston, SC 29405

Topics Covered

- Human Trafficking - Culture - Mindset
- Identifying Human Trafficking Crimes
- Creating a Systematic Approach to Human Trafficking Investigations
- Proactive Human Trafficking Investigations
- Importance of Evidence Collection
- Tools and Techniques for Human Trafficking Operations & Investigations with Training Lab
- Resources for Law Enforcement to Help Investigate Human Trafficking - Training Lab
- Victimology
- Illicit Massage Businesses - Sex and Labor Trafficking
- Labor Trafficking
- Identifying and Interviewing Human Trafficking Victims
- Trauma-Informed & Victim Centered Approach
- Community Education and Engagement

24 hours of Continuing Law Enforcement Education (CLEE)

Course Purpose

This course will provide law enforcement officers with operational tools and techniques that will allow them to proactively identify and investigate human trafficking while understanding the importance of a victim-centered and trauma-informed methodology.

Who Should Attend

Local, State, and Federal Law Enforcement, Tribal Police, and Prosecutors.
This course is not open to the general public.

Instructors

Major [ ]
Raleigh Police Department, Retired

QMHP, MPP
Anti-Human Trafficking Advocate

Special Agent [ ]
ICE/HSI, Retired

Enrollment Questions: CALL 800.819.ERASE
Email: [ ]

HelpERASE.org

Registration Link: [ ]
Advanced Human Trafficking Investigations
Law Enforcement Course
ABOUT US

ERASE Child Trafficking is a U.S. based organization with global impact. We are focused on eliminating child trafficking by implementing a holistic approach, from education and recovery to life reclamation.

ERASE’s mission is to be a unifying voice creating a cultural shift in the perception of child trafficking, working towards its eradication by empowering action against this inhumanity through education, recovery and life reclamation.

Building Partnerships to Combat Child Trafficking
 WHY ERASE OFFERS HUMAN TRAFFICKING TRAINING TO LAW ENFORCEMENT

Human Trafficking is the fastest-growing business of organized crime. Trends and patterns are constantly training. Most law enforcement agencies do not have policy and procedures in place for investigating human trafficking crimes.

Law enforcement officers are on the front lines of this battle. Patrol officers are often the first to come in contact with victims of human trafficking. Victims rarely self-report due to fear or not identify themselves as victims, we rely on police officers to step in and help. After identifying victims, detectives or agents need to know how to investigate these crimes while using a victim-centered approach.

Our training takes officers through the steps of identifying, investigating and building prosecutable cases.

Human Trafficking is the fastest-growing business of organized crime.
Withheld pursuant to exemption (b)(6); (b)(7)(C) of the Freedom of Information and Privacy Act.
TRAFFICKING NUMBERS

12-14

12-14 is the average age that U.S. kids are first pulled into commercial sex.

83%

83% of sex trafficking victims found in the U.S. were U.S. citizens.

1.6-2.6

Between 1.6 and 2.6 million youth run away each year.
**COURSE PURPOSE**

This course will provide law enforcement officers with operational tools and practices that will allow them to proactively identify and investigating human trafficking while understanding the importance of a **victim-centered** and **trauma-informed methodology**.

**COURSE DESCRIPTION**

This course provides attendees with an overview of Human Trafficking crimes, as defined in the U.S. Trafficking Victims Protection Act of 2000 (TVPA) and state laws. Case analysis and development is discussed, as well as the legal and investigative elements of Human Trafficking crimes. A victim-centered approach to proactive investigations and effective approaches to interviewing victims is introduced. Pre and post-operational planning are also covered. Additionally, participants will understand the importance of utilizing digital evidence and technologies when investigating Human Trafficking crimes.
COURSE OBJECTIVES

By the end of the course, through the course manual, materials and instructor presentations, the attendees will know:

- Indicators of Human Trafficking specific their area.
- The importance of using a victim-centered approach when working with victims of Human Trafficking
- Various concepts and methods on how to identify and interview victims of Human Trafficking
- Available resources to investigate Human Trafficking crimes
- How to develop a case after receiving a tip about Human Trafficking
- The importance of proactive investigations
- Government benefits and protections for victims of Human Trafficking
- Technologies available to identify Human Trafficking Victims
- The importance of community education, engagement, and creating a community task force
COURSE AGENDA

Day 1
0800-0815 Opening remarks
0815-0915 Culture and Mindset
Where does Human Trafficking start?
0915-0930 Class Objectives and Introduction
0930-0945 Break
0945-1050 HT Practices and Principles
1100-1200 HT Practices and Principles
1200-1300 Lunch

1300-1330 Exercise - Choices
1330-1430 Federal/State HT Law
1430-1445 Break
1445-1550 Victimology
1550-1600 Break
1600-1700 Spotlight, Website Review and Related Technology

Day 2
0800-0815 Day 1 Review
0815-0915 Understanding HT Victims/Trauma
0915-0930 Break
0930-1200 Tools and Techniques for HT Operations - Investigations With Training Lab
1200-1300 Lunch

1300-1315 Tunnel Vision
1315-1430 Drugs as a Form of Coercion
1430-1445 Break
1445-1550 Combining Public Health and Public Safety Strategies to combat HT
1600-1700 Victim Centered Approach

Day 3
0800-0850 Massage Parlors: IMBs
0900-1000 Human Trafficking Advocate Speaker
1000-1010 Break
1010-1030 What Does Trauma Look Like
1030-1200 Training Lab
1200-1300 Lunch in class

1300-1450 HT Case Development and Investigative Procedures
1500-1550 DHS Programs: HSTC/APAN Importance of a Task Force
1600-1700 Local Resources - Closing Remarks Participant feedback

Additional Case Study-Digital Evidence Sources
Preservations Letters, Court Orders DHS Film: Web of Lies, Labor Trafficking
Practical Exercise: Use host agency paperwork and write Op Plan for Demand or Supply Operation
Agenda Subject to Change
INSTRUCTORS

Major
Raleigh Police Department, Retired

Major is a 24-year veteran of the Raleigh Police Department. He worked in all divisions of the Raleigh Police Department and was assigned to work at the District Attorney’s Office as an investigator. He is a certified police instructor with 17 years of experience and still regularly trains officers. While supervising the Raleigh Intelligence Center, he focused on developing a consistent and proactive response to Human Trafficking cases. He served as the Human Trafficking Coordinator for the Raleigh Police Department and supervised operations that included Anti-Human Trafficking Operations. He continues to plan and collaborate with other law enforcement agencies and victim service providers to address Human Trafficking.

Major is a native Spanish speaker which allows him to conduct outreach and impact Spanish speaking victims of Human Trafficking. He regularly assists with public awareness events and is a member of the Rapid Response Team in Raleigh.

He has a passion for developing collaborative Anti-Human Trafficking Operations that reinforce the need for local, state, and federal law enforcement agencies to collaborate.

Special Agent
ICE/HSI, Retired


In February 2011, he was assigned to the Office of the Special Agent in Charge Miami, Human Trafficking Group and was the Coordinator for the South Florida Human Trafficking Task Force (SFHTTF) until December 2017 when he retired. He worked many Human Trafficking cases with other local, state, and federal law enforcement agencies with the assistance of non-governmental organizations, faith-based organizations and local and state government agencies.

As an instructor, presenter or class coordinator, he traveled to the International Law Enforcement Academies in Hungary, Botswana, and Vietnam. In this capacity, he educated international law enforcement officers from all over the world on the prevention of Human Trafficking, protection of victims and prosecution of human traffickers. He also assisted the Bahamian and Jamaican Police Departments and Prosecuting Attorneys establish their own Human Trafficking programs. He regularly presents to local police departments, universities, high schools and community organizations.
INSTRUCTORS

QMHP, MPP
Human Trafficking Advocate

As a 2015 Presidential Management Fellow, who rotated throughout the Federal Government, working at both The Department of Health and Human Services - Office on Trafficking in Persons (OTIP) and The Human Smuggling and Trafficking Center.

While at the Office on Trafficking in Persons, she helped stand up the National Human Trafficking Training and Technical Assistance Center and develop new public awareness materials for the ‘Look Beneath the Surface’ campaign. At the Human Smuggling and Trafficking Center, an Inter-agency effort, she stood up The Human Trafficking Community of Interest which unified partners against human trafficking through web-based tools, interactive communication, & real-time information sharing.

Currently working at the Department of Homeland Security Headquarters Chief Financial Office, where she manages the Immigration and Borders portfolio consisting of Immigration Customs Enforcement (ICE) and The United States Citizenship and Immigration Services (USCIS).

Holds a Bachelor’s in Criminology, Law, and Society with a concentration in Conflict Analysis & Resolution and a Master’s in Public Policy with a concentration in Terrorism, Transnational Crime, and Corruption from George Mason University.

Has been an advocate for vulnerable populations for well over a decade serving victims/survivors and building capacity in the areas of domestic violence, human trafficking, mental health, and at-risk youth. She is a qualified mental health professional in the state of Virginia. The 2016 Winter Edition of The George Mason Spirit Magazine published an article highlighting her work with vulnerable populations and dedication to serving her community. She is active in the field of domestic sex trafficking where she volunteers and supports local initiatives, including being an acting-board member of Amara-legal, a law firm dedicated to helping victims of trafficking obtain record expungement. She strongly believes that each individual should be afforded the opportunity to succeed.
Erase Child Trafficking

For Additional Information Contact

Executive Director

ChildTrafficking.org

800-819-7597

EraseChildTrafficking.org
### Part 1: Please identify the applicant point of contact (POC)

<table>
<thead>
<tr>
<th>Applicant POC</th>
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<tr>
<td><strong>Organization Name</strong></td>
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<td><strong>POC Name</strong></td>
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<td><strong>Phone Number</strong></td>
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<td><strong>Email Address</strong></td>
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### Part 2: Please identify the application

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<td><strong>Solicitation Name</strong></td>
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<td><strong>Project Title</strong></td>
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### Part 3: Please identify the project location and applicant type

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<td><strong>Applicant Type (Tribal Nation, State, County, City, Nonprofit, Other)</strong></td>
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Part 4: Please provide a project abstract

Enter additional project abstract information. Unless otherwise specified in the solicitation, this information includes:

- Brief description of the problem to be addressed and target area and population
- Project goals and objectives
- Brief statement of project strategy or overall program
- Description of any significant partnerships
- Anticipated outcomes and major deliverables

Text should be single spaced; do not exceed 400 words.

**Project Abstract**

The Manchester New Hampshire Police Department (MPD) and Child and Family Services of New Hampshire (CFS), are applying to enter into a cooperative. MPD is requesting $728,493 and CFS is requesting $637,556 to develop the New Hampshire Human Trafficking Task Force (NH-HTTF), under the Enhanced Collaborative Model to Combat Human Trafficking Purpose Area 1 solicitation, Competition ID # [REDACTED].

Human trafficking, both sex and labor, exists in New Hampshire. Cases span the entire state. Victims have been male, female, citizen and non-citizen, adults and minors. In 2013 stakeholders investigated 7 cases; in 2014, 6 cases; and in 2015, 6 cases. In 2013 and 2014 stakeholders prosecuted no cases, and in 2015 stakeholders prosecuted 4 cases. In 2015 stakeholders provided services to 60 victims. Data from 2013 and 2014 indicates services for victims but is only anecdotal.

The NH-HTTF is a multidisciplinary group of stakeholders convened with the goal of developing and enhancing the multidisciplinary trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:
- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, and federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

Over the 3 year project period the TF will formalize and enhance existing efforts and build capacity statewide by: 1) establishing and sustaining an effective leadership and structure that will engage necessary resources to support the goal; 2) making data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking within the geographic area; 2) Identifying victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques; 4) conducting proactive investigations of sex and labor trafficking with goal of successful prosecution of cases at state or federal level; and 5) ensuring a comprehensive array of services are readily available to meet individualized needs of all victims.

The NH-HTTF is led by a core team comprised of MPD, CFS, ICE Homeland Security Investigations (HSI), The US Attorney’s Office for the District of New Hampshire (USAO/NH), and Give Way To Freedom (GWTF).

Through this collaboration we will improve state efforts to identify victims; investigate & prosecute sex and labor cases at local, state, and federal level; and address the needs of victims through delivery of a comprehensive array of services.
Part 5: Please indicate whether OJP has permission to share the project abstract

If the applicant is willing for the Office of Justice Programs (OJP), in its discretion, to make the information in the project abstract above publicly available, please complete the consent section below. Please note, the applicant’s decision whether to grant OJP permission to publicly release this information will not affect OJP’s funding decisions. Also, if the application is not funded, granting permission will not guarantee that information will be shared, nor will it guarantee funding from any other source.

- Permission not granted
- Permission granted (Fill in authorized official consent below.)

On behalf of the applicant named above, I consent to the information in the project abstract above (including contact information) being made public, at the discretion of OJP consistent with applicable policies. I understand that this consent is only necessary to the extent that my application is unfunded; information submitted in an application that is funded (including this abstract) is always releasable to the public consistent with FOIA rules. I certify that have the authority to provide this consent.

**Authorized Official (AO) Consent**

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<th>AO Name</th>
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<tr>
<td>Title</td>
<td>President &amp; Chief Executive Officer</td>
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<tr>
<td>Organization Name</td>
<td>Child and Family Services of NH</td>
</tr>
<tr>
<td>Phone Number</td>
<td>603-518- [Redacted]</td>
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*Note: This document is to be submitted as a separate attachment with a file name that contains the words “Project Abstract.”*
STATEMENT OF THE PROBLEM:

Sex and labor trafficking happen in New Hampshire, and cases span the entire state. While consistent data collection continues to be one of our main challenges, we know between 2013 and 2015 that stakeholders, including members of the current Task Force ("TF"), responded to the cases described below, all of which represent unique incidents.

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<th>'16 Inv</th>
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<tbody>
<tr>
<td>Labor</td>
<td>3</td>
<td>2</td>
<td></td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex</td>
<td>4</td>
<td>4</td>
<td></td>
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<td>5</td>
<td>4</td>
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**Labor Investigations & Prosecutions:** There have been six documented investigations, involving construction, restaurants and clubs, home health care, and forestry, since 2013 (*source: ICE/HSI*). These cases occurred in Hillsborough, Merrimack, Grafton, Coos, and Strafford Counties. Perpetrators have been individuals, small businesses, and labor contractors. While none of the cases were prosecuted, two reached private settlements and another was pursued by the Department of Labor Wage and Hour Division (WHD) for workplace violations. One investigation was ultimately found not to be trafficking, however, under the directives of the United States Attorney’s Office (USAO), potential victims were treated as such until investigating agents had clearly ruled out trafficking. This is standard operating procedures for our efforts, recognizing victims often come to our attention in ways in which they are not readily identified as victims of trafficking.

**Sex Investigations & Prosecutions:** There have been 17 sex trafficking investigations since 2013 representing 25 perpetrators, 17 arrests, 12 indictments, 4 prosecutions and 8 convictions (*source: ICE/HSI, Manchester Police Department*). Several investigations are still ongoing. These cases have occurred in Hillsborough, Rockingham, and Merrimack Counties. A federal case from Rockingham County involving a 15 year-old runaway and 4 male defendants began in
spring 2014. Defendants were convicted on Mann Act charges in the fall of 2015, and sentenced to 5-8 years. Because it involved a minor engaged in commercial sex, this was a trafficking case.

A county prosecution in Rockingham involving the use of heroin to coerce adult victims into prostitution resulted in a sentence of 8-20 years incarceration. A county prosecution in Merrimack involving an adult couple selling two underage girls for sex came to light when they sought to sell one into a forced marriage. Two cases in Hillsborough are currently under indictment. Each case was prosecuted by a different jurisdiction, demonstrating both the scope of trafficking within the state as well as the active engagement by prosecutors.

<table>
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<th>2013</th>
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<th>Total</th>
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<tr>
<td>Labor</td>
<td>8</td>
<td>2</td>
<td>1</td>
<td>11</td>
</tr>
<tr>
<td>Sex</td>
<td>unknown</td>
<td>unknown</td>
<td>60</td>
<td>60</td>
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**Services for Labor victims:** Since 2013, 11 victims of labor trafficking have received services. Two were US citizen minors who received services from Child and Family Services of NH ("CFS", **source:** CFS). Nine were adult foreign nationals, some of whom entered the country legally, several on H2B visas, while others were undocumented. In one case, the victim arrived on a fiancé visa. Instead of marriage she was forced to care for an elderly man with dementia, and was not allowed to leave the house or socialize. Six were eligible for, and received support from the HHS/ORR National Human Trafficking Victim Assistance Program (TVAP) and an immigration attorney (**source:** International Institute of New England (IINE)). All 6 of those have received T visas. The remaining 3 received services from other programs (**source:** USAO, Give Way to Freedom, Catholic Charities NH). We identified an additional 11 potential labor victims that exhibited red flags but left the area or chose to return to their country instead of staying to pursue immigration relief (**source:** IINE). Where possible, providers worked to connect those individuals with services in their new location.
**Services for Sex victims:** For sex trafficking, data prior to 2015 is anecdotal and not included due to an inability to declare cases unique. A total of 60 victims received services in 2015 (*source: CFS, NH Coalition Against Domestic and Sexual Violence (NHCADSV)*). CFS served 6 victims: 2 minors, and 4 youth ages 18-21 who were coerced into prostitution. CFS identified an additional 26 potential victims ages 18-21 who disclosed trading sex for basic needs, but there was not enough information in the file to confirm force, fraud, or coercion. NHCADSV reported 54 victims served by its 10 members in 2015.

And these are not all. We face the same data challenges as the entire anti-trafficking field. For example, although we suspect trafficking in certain cases, the individuals involved have either not disclosed, and/or we have only been able to interact with them for a short period of time, not enough time to build the trust necessary to disclose. The latter is often due to a lack of services to meet their unique needs. Compounding this is the fact that within many TF member agencies, formal data tracking for human trafficking does not exist. The few agencies that do formally collect data only began to do so in 2015, and those agencies face a learning curve for staff, such that numbers are likely lower than reality. For example, CFS included questions related to trafficking in its database in late 2014. They have expressed that the combination of staff turnover and a learning/implementation curve is the likely explanation for the relatively low numbers of youth victims recorded over the last year. Law enforcement began to collect data early in 2015, but only as a by-product of intelligence sharing and case discussions within the Law Enforcement Committee. This challenge is discussed in further detail below.

Meanwhile, the diversity of cases we have seen illustrates the scope of the problem in NH. Victims tend to come from already vulnerable populations – foreign nationals, runaway and homeless youth, and those with substance use disorders, and are both male (6) and female (65).
adults (63) and minors (8), citizens (61) and non-citizens (10). We have identified cases in 6 of
the 10 counties in the state. The majority came from the two largest counties, Rockingham and
Hillsborough, in which lives approximately 53% of the total NH population, but cases have also
been identified in Grafton and Coos, two of the more rural counties.

Characteristics of the NH geography, economy, and demographics, further support the data
we do have. First, NH is a gateway to New England, New York, and Canada. Several known
drug trafficking routes run through the state via I-95, I-93, I-89, and Rt. 16. It is well known that
traffickers use these routes to transport victims, and our cases support this finding. For example,
the Rockingham federal case described above involving a runaway was identified in Salem, NH
which is located on the I-93 corridor, directly adjacent to the NH/MA border.

Second, NH is home to low-wage/low-skill industries that rely on migrant labor, such as
hospitality/tourism in the White Mountains and Seacoast, agriculture and forestry in the North
Country, and fishing on the Seacoast. Each year Merrimack and Belknap Counties host
NASCAR races and Bike Week, and local law enforcement has raised concerns about labor
trafficking due to the increase in temporary hotel staffing and traveling vendors.

Finally, there are a number of other populations that are more vulnerable to trafficking,
including a large population of runaway and homeless youth in cities such as Manchester and
Nashua, and an increasing number of individuals addicted to opiates and other drugs. Nationally
it is recognized that about 30% of runaway and homeless youth engage in survival sex, and
anecdotal evidence from CFS staff confirms this for NH. NH also have a significant opiate
epidemic, and we have seen firsthand how individuals with drug addiction problems are
vulnerable to trafficking. Virtually every sex trafficking case identified in 2015 involved the
trafficker exploiting the victim’s heroin addiction to coerce them to engage in commercial sex
acts. Within the past year, we have had one trafficking victim die as a result of heroin abuse.

**Previous or current attempts to address the problem:**

The Task Force has never received DOJ funding. It originated in 2012, when former NH Attorney General Michael Delaney convened a Commission to Combat Human Trafficking. Comprised of diverse stakeholders, the Commission operated through three Committees – Law Enforcement, Policy, and Community Engagement. Through 2013 and 2014 the group worked to amend state law, and began developing a best practice guide for professionals. By the end of 2014, we recognized the need for a more coordinated and operationalized effort, including a specific Victim Services component.

**Law enforcement and Service provider partnership:** Meanwhile, law enforcement and victim services continued to work together on cases. The two fields have a long history of such partnerships. Applicants Child and Family Services (CFS) and Manchester Police Department (MPD) work closely, including on all potential human trafficking cases as well as all emergency cases involving a youth at risk of abuse. In addition, other TF partners, including USAO, HSI, Give Way to Freedom (GWTF), and others, have a long history of collaboration. For example, during a 2012 case involving potential labor trafficking, the USAO, HSI, two legal service agencies, and one victim service agency worked together to set up an interview in a safe and comfortable location, ensure interpreters were available, and offer services and support. While the victims chose to return to their home country, the response set a standard for collaboration. This is reflected in a more recent case where Elliott Hospital notified partner HSI of a victim entering medical detox. Staff at Elliot, HSI, GWTF, and partner YWCA collaborated to meet and interview the victim, and arrange for a safe shelter upon her release from the hospital.

With this backdrop the current Task Force formed in June of 2015, building off of the
original Commission and existing collaborations between law enforcement and services. At the start we adopted the Enhanced Collaborative Model to Combat Human Trafficking (ECM) goals and objectives as our roadmap for operationalizing efforts. One key project we completed was a statewide survey, designed to give us an understanding of stakeholder basic awareness, knowledge and experience, and training experience and needs (herein after “Baseline Survey”). Respondents were from law enforcement, victim services, healthcare, youth services, legal services, prosecutors, educators, and businesses (collectively hereinafter “professional stakeholders”). These are fields the TF determined to be priorities due to an ability to investigate cases, identify victims, and/or provide support to all trafficking victims in NH. We received over 400 responses statewide. The results relate to the objectives for this project, and we intend to repeat the survey annually to measure improvements and identify ongoing gaps.

We have also met monthly to 1) develop a strong membership and structure that promotes collaboration, accountability, and sustainability; and 2) better understand the needs and priorities related to our goals and objectives. Through these efforts we have ascertained our overarching challenge: a lack of a formal system or infrastructure to respond to trafficking victims. We respond, and there are systems that we call on - primarily DV agencies - but they lack capacity and resources. We connect victims with services but the best way to describe this setup is, "we make it work as best we can." The benefit of what exists is that we have many interested partners, who have recognized the need and committed to supporting victims and statewide efforts to build capacity. The drawback is that none of these agencies have the capacity to manage the development of a system, stranding us in perpetual reaction mode. Efforts to develop protocols, to collect data, to coordinate training to stakeholders have all been stymied by lack of human resources. The work is often being done as an add-on by one dedicated person, and the
entire project collapses if that person leaves. This is not the way to build a sustainable, coordinated, state-wide response that identifies victims, proactively investigates and prosecutes cases, and provides comprehensive services to all victims.

Stemming from the knowledge that we must create the infrastructure, we have prioritized the following 7 specific **outstanding problems, gaps in services, and unmet needs regarding investigations, prosecutions, and victim services in NH:**

First, we need dedicated case management for all survivors. The only trafficking-specific case management services in NH are from the HHS/ORR per-capita National Trafficking Victims Assistance Program (TVAP) which is limited foreign national victims with or seeking HHS certification. Dedicated support for US Citizens, LPRs, and foreign nationals with immigration status such as asylees and refugees, however, does not exist. Often, survivors receive no case intensive management, putting them at risk of falling through the cracks of the multiple systems involved in their treatment and care. Those that do receive case management do so through other programs such as domestic violence crisis centers or runaway and homeless youth programs. Despite overlap in populations and services, the identification of more cases only adds to the workload of already overwhelmed staff, with the complexity of the survivor’s needs placing additional burdens on the limited resources of these programs. Moreover, without dedicated case management, professionals who have identified survivors are left uncertain as to whom to make referrals. As a result of these limitations to service, many survivors of trafficking leave soon after having been engaged, or decline services altogether.

Second, NH is facing a significant opiate crisis, and because of this many investigators are being diverted to drug investigations. Our law enforcement partners continue to be committed to investigating sex and labor trafficking, and they continue to investigate, share intelligence, and
provide support for investigation, but none have the capacity to commit a full time investigator that can focus solely on proactive investigations of sex and labor trafficking. This is especially true for the smaller jurisdictions that may lack even the basic capacity to investigate trafficking given the complexity and resource-intensive nature of such investigations.

Third, we need to create a stronger service network statewide. In our Baseline survey, 52% of respondents were unaware of resources for victims. When asked about their biggest challenge, law enforcement repeatedly indicates a lack of services. The gap here is not in the existence of services, but rather in the outreach, training, and ability to connect survivors with those services. This is especially true in the more rural counties.

Fourth, training for professional stakeholders remains a critical gap. While TF members have all had training, 37% of respondents to our Baseline Survey indicated they had received no training. Training has been concentrated in Hillsborough, Rockingham and Merrimack Counties. For the rest of the state training is scattered. This results in missed opportunities to identify victims. Law enforcement especially has indicated a need to train all officers statewide given their likelihood of encountering cases. On any given day investigators, including labor investigators, encounter potential victims while responding to other incidents, but not necessarily pursuing trafficking leads because they lack the training to identify it. The same is true for service providers, especially those in the Substance Use Disorder Community given the current opiate epidemic in NH, and the intersection of that and sex trafficking.

Fifth, we lack protocols. With no system in place, everything continues to operate informally. This creates confusion and delay investigations and services, and tends to involve more parties and information sharing than necessary which further jeopardizes investigations, prosecutions, and victim safety. As cases increase and we look to build out capacity state-wide, policies and
protocols are critical in order to ensure trauma-informed practices, confidentiality, safety, and that victims are connected with services.

Sixth, as described above, we lack a coordinated and systematic mechanism for collecting data. Data collection varies from anecdotal, to informal spreadsheets created by one engaged staff member, to actual database fields for a handful of agencies. The Division of Children, Youth and Families (DCYF), will implement data collection in the fall pursuant to a 2014 federal law. Notably, they will be collecting data on both sex and labor trafficking of children, although the law mandated it only for sex. Nonetheless, formal data collection by a handful of agencies is not enough. We cannot effectively develop a response until we better understand what we are seeing, and thus need to coordinate the sharing of that data, and extend formal collection to all TF members. For example we need to coordinate data collection so we better understand the challenges for victims in rural settings, and so we can make data informed decisions.

Finally, a challenge that connects all five of the others is a lack of dedicated management and coordination. A lack of dedicated coordination results in duplicative efforts, wasted resources, largely unrealized victim outcomes, and widely different messages among service providers, law enforcement, victims, and the general public. For example, when the TF first started meeting we discovered three groups were independently working on a curriculum for high school staff. A lack of dedicated coordination also means individual disciplines and members are left trying to organize, collaborate, and overcome barriers on their own, resulting in frustration and tension between organizations. Efforts to resolve this by identifying additional partners, formalizing a referral process, rolling out a consistent training for stakeholders, developing protocols and gathering data to inform our efforts, have repeatedly been stymied by the fact that no agency or person has the ability to dedicate enough time to manage such projects. The Task Force has had
the benefit of very basic part time interim coordination through support from GWTF and volunteer time, however as we formalize efforts and build out statewide there is a need for full time coordination to achieve our goal and objectives.

This funding will provide the starter funds to dedicate staff, provide training, and coordinate data collection and evaluation that we can then use to build out a system across the state, and show the state legislature and others the need to support such infrastructure building. We will hire two full time Intensive Case Managers (ICMs) to provide case management to all victims. They will act as central points for referrals and services, and through their work help identify additional resources that can be leveraged to create a stronger service network. Manchester PD will dedicated a full time investigator to focus solely on proactive sex and labor investigations, who can operate and support investigations statewide and support smaller jurisdictions that lack the capacity to engage in long term and complex trafficking investigations. We will use TIMs and PMT to collect data, providing us with a mechanism and basis to coordinate data collection, and will hire an evaluator to analyze collected data to inform our efforts. Funding will allow us to develop and deliver consistent training to stakeholders, and provide professional development to enhance TF member ability to investigate, prosecute, and provide services to all victims. And finally, funds for this project will allow us to hire a full time Project Director that can manage efforts, marshal resources, direct the inputs of all the partners, and guide the development of protocols to set consistent standards for response.

**PROJECT DESIGN AND IMPLEMENTATION:**

**Geography:** The TF will cover the entire state of NH. Given its small size in terms of population and geography, this approach is both reasonable and necessary. The ten counties in the state fall into three categories. First, Hillsborough which has strong law enforcement and
service provider partnership efforts. Second, Rockingham and Merrimack. Although not as robust as Hillsborough, both have strong foundations for law enforcement efforts and services. The third category comprises the rest of the state, where capacity is scattered.

Over the 3 year project period we will formalize and enhance efforts in Hillsborough, Rockingham and Merrimack Counties, and build capacity statewide in-order to achieve the goal of developing and enhancing the multidisciplinary trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to:

- Identify victims of all forms of trafficking;
- Investigate & prosecute sex and labor cases at local, state, and federal level; and
- Address individualized service needs of victims through delivery of a comprehensive array of services.

The TF will work together through dedicated staff, including a Project Director to oversee efforts; monthly meetings and continuous communication; case reviews; shared development and use of materials, protocols, and a common agenda; data collection and analysis; and additional ways as described below and in the Attachments. Specifically, the following five objectives and correspondent activities flow from and provide focus for our collaboration toward our goal:

**Objective 1:** We will make data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking in NH ("Obj. 1"). Key activities will include:

**Activity 1.1:** Manchester PD (MPD) and Child and Family Services of NH (CFS), along with project partners USAO, ICE/HIS, and GWTF (collectively hereinafter "Core Team"), have jointly developed a plan and process for routine collection of data. Data will be collected from law enforcement partners, service provider partners, and outreach/training efforts. It will be entered into TIMS and PMT as appropriate, and we will refine the plan as necessary if funded.

**Activity 1.2:** We will develop a process for sharing and analyzing data in order to develop a comprehensive understanding of trafficking in NH. This will include sharing data from TIMS
and PMT at TF meetings, and analyzing through discussion at our quarterly Core Team meetings and with input from the Evaluator. Law enforcement will also work with the NH Intelligence and Analysis Center to identify ways they can assist efforts. The Project Director will work with Core Team partners and all TF members to develop protocols for data and information sharing.

**Activity 1.3:** We will coordinate on the submission of semiannual progress reports. Part of the role of the Project Director will be to coordinate the writing, compiling and submission of semi-annual progress reports, including pulling all necessary information from TIMS, PMT, and other TF records such as meeting minutes and attendance sheets. The Evaluator will assist.

**Activity 1.4:** The TF has partnered with Plymouth State University to provide project evaluation and assist with data analysis. The Core Team, in collaboration with Dr. Stephanie Halter, has developed the plan described in Attachment 6, to evaluate TF performance using both quantitative data from performance measures and qualitative data from stakeholders. The findings will be used to improve our efforts.

For additional details see Attachment 6, Plan for Evaluation and Data Collection.

**Objective 2:** We will identify victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques ("Obj. 2"). We have a committee comprised of representatives from law enforcement, victim services, and other stakeholders specifically for Training and Community Engagement (hereinafter “Training Committee”). The Project Director, with support from the Training Committee, will:

**Activity 2.1:** Develop training and public awareness materials with shared message. In the fall of 2015 we began developing shared materials, with the intent of cutting down on redundant efforts, establishing consistent messaging, and connecting stakeholders with trainings so that they can both identify potential victims, and interact (as appropriate, for instance with service
provider stakeholders) in a trauma-informed manner.

**Activity 2.2:** Ensure relevant stakeholders receive training. As described above, p. 6, the TF has identified 8 groups as relevant professional stakeholders. These are our priority audiences. We will provide training for these audiences and, whenever possible, our trainings and outreach will be performed jointly with a representative from both services and law enforcement.

For additional details see Attachment 5, Plan for delivering Training and Professional Development, and Attachment 3, Plan for Proactive Investigations.

**Objective 3:** We will conduct proactive investigations of sex and labor trafficking with the goal of successful prosecution of cases at state or federal level (“Obj. 3”).

**Activity 3.1:** Identify physical and organizational location of TF. Current efforts are a hybrid, combining Manchester PD, HSI, and other partners including State Police, Nashua, Salem, Hampton, and Portsmouth PDs. Physically this group is anchored in Manchester, with MPD and HSI as the organizational leads along with the USAO. Manchester is only a short distance from Concord where the USAO is located. This funding will allow us to formalize this arrangement and establish a collaborative Human Trafficking multi-jurisdictional unit.

Law enforcement staff will be co-located in office space provided by HSI, located at the Norris Cotton Federal Building, in Manchester. HSI Manchester hosts the New Hampshire Internet Crimes Against Children Task Force’s (ICAC) Computer Forensics Laboratory, and can thus leverage the ICAC’s computer forensics expertise to further investigations. The U.S. Department of Labor, Wage and Hour Division (WHD) is also in Manchester, making collaboration for labor investigations easier.

Additional activities for this objective include: **Activity 3.2:** Conducting proactive investigations; **Activity 3.3:** Developing clear protocols and procedures for victims’ rights and protections; and **Activity 3.4:** Implementing victim-centered and trauma-informed techniques.
Objective 4: We will ensure a comprehensive array of services are readily available to meet individualized needs of all victims ("Obj. 4"). With this funding the Task Force will:

Activity 4.1: Assemble comprehensive array of victim services, including formalizing and enhancing our existing service partnerships in Hillsborough, Rockingham and Merrimack counties, and building capacity state wide through dedicated staff, outreach and stakeholder training to ensure a comprehensive array of services are available to meet the individualized needs of all victims. CFS will hire two ICMs who will be located in Hillsborough and Rockingham Counties, but receive referrals for any case regardless of location. These are the 2 largest counties in terms of population, and over 50% of victims identified there.

Activity 4.2: Leverage (not duplicate) existing services. In Hillsborough and Rockingham the ICMs will leverage our existing service partnerships, described in more detail in Attachment 4, to ensure a comprehensive array of services for the majority of victims identified. CFS has the benefit of locations statewide, thus for referrals outside of Hillsborough and Rockingham, the ICMs will work with the closest CFS site, as well as the efforts of any TF members located in that area, to identify additional services that can be leveraged to meet the victim’s needs.

Activities 4.3 and 4.4: Services will be provided to all victims – sex, labor, foreign national, US citizen, and LPRs. CFS will provide case management to all victims, with the exception of certified foreign national victims which will be referred to the TVAP program administered by IIINH. In the event that a foreign national victim is outside the capacity of IIINH due to location, CFS will seek permission from OVC to continue to provide support or work with the TVAP grantees such that CFS or another local partner can provide those services.

For additional details see Attachment 4, Plan for Delivering Comprehensive Services
Objective 5: We will establish and sustain effective leadership and a structure that will engage necessary resources to support the 3 goals (“Obj. 5”). Key activities include:

Activity 5.1: Identifying consistent, experienced, and committed task force leadership. Over the last 18 months we have worked to identify consistent, experienced, and committed task force leadership. The current leadership was identified through planning meetings between the USAO, AGO, GWTF, and HSI. Together they identified MPD and CFS as ideal leads for law enforcement and service provision and GWTF for overall coordination, given their respective experience, location, and organizational stability to support a sustained effort. MPD, CFS, and GWTF are joined by USAO, HSI to comprise the leadership ("Core Team"). All members of the Core team are responsible for leadership of TF efforts including participating in Core Team meetings and planning.

Detective Sergeant [REDACTED] represents MPD and non-federal law enforcement on the Core Team. He supervises and supports investigations, and co-leads the Law Enforcement Committee. He shares responsibility for providing training to stakeholders, and engaging necessary resources to support proactive investigations of all forms of trafficking, and ensuring that data is reported into PMT or according to procedures developed by the TF. He has been a member of the TF for 3 years, and provided leadership since June 2015.

[REDACTED], the Program Manager for CFS’s Runaway and Homeless Youth Program. Her role on the Core team is to represent service providers. Her responsibilities include supervising case managers, ensuring that data is reported into TIMS or according to procedures developed by the TF, and co-leading the Services Committee. She has been a member of the TF for 3 years, and provided leadership since June 2015.

[REDACTED] represents Give Way to Freedom, and has been designated to be the Project
Director. As part of the Core Team, she is responsible for convening meetings, providing support to all Committees as necessary, overseeing the work of the Evaluator, performing administrative tasks, and providing overall guidance and management for TF efforts in pursuit of the goal and objectives. She also co-leads the Training Committee. She has been a member of the TF for 3 years, provided informal leadership for 2 years and formal leadership since June 2015.

[Redacted] is the Resident Agent in Charge (RAC) and represents HSI. His role is to represent federal investigation interests. He supervises and supports investigations, and co-leads the Law Enforcement Committee. He shares responsibility for providing training to stakeholders, and engaging necessary resources to support proactive investigations of all forms of trafficking, and ensuring that data shared for PMT and TIMS according to procedures developed by the TF. He has been a member of the TF for 2 years, and provided leadership since November 2014.

[Redacted] is an Assistant United States Attorney (AUSA) and represents the USAO. He is responsible for prosecuting federal cases, and engaging necessary resources to support proactive investigations of all forms of trafficking. He has worked with TF partners for 2 years, and is new to the leadership.

[Redacted] is the Victim/Witness Coordinator at the USAO. Her role is to serve as a point of connection at USAO, provide the bridge between law enforcement and services, and co-lead the Victim Services Committee. Her responsibilities include working to ensure victims are connected to services, and helping engage necessary resources to support victims and victim service development. She has been part of the leadership group for two years.

**Activity 5.3: Identify and dedicate sufficient administrative staff:** As described above, the TF will hire a Project Director who will be responsible for the overall development of the TF and progress toward the goal and objectives. This includes, but is not limited to, guiding joint
development of training and outreach materials; performing administrative tasks including convening regular meetings, guiding the development and update of task force protocols, formalizing MOUs, and conducting outreach to expand task force membership; and collecting, sharing, and reporting task force data. The Project Director will also deliver trainings, and work with the Services Committee to build capacity for statewide services. She will be located at CFS, with workspace available at MPD and the ability to meet at HSI as necessary and required.

**Activity 5.2:** Ensure membership includes all essential agencies: The TF is multidisciplinary and diverse, and all members are vetted and will be asked to sign a Memorandum of Understanding (MOU) agreeing to adhere to TF policies and protocols, to be formalized within 90 days of any award. A full list of current members can be found in the draft Member MOU, Attachment 11. These include, but are not limited to: the USAO; the NH Attorney General’s Office (AGO); the Hillsborough County Attorney’s Offices; Nashua and Salem Police Departments; a cross section of service providers including youth service provider Child and Family Services (CFS); the International Institute of New Hampshire (IINH) which services immigrants and refugees; New Hampshire Legal Assistance; the Division of Children, Youth and Families (child welfare); the US Department of Labor, Wage and Hour Division (MOU pending) and Office of the Solicitor; victim/witness coordinators and advocates from the USAO, AGO, and HSI; the NH Episcopal Church (faith based); Elliot Hospital (MOU pending), and the NH Restaurant and Lodging Association (allied professionals). Throughout the 3 year project period we will identify and recruit new members based on identified gaps, capacity building state-wide, analysis of performance metrics, and results of the Evaluator’s efforts.

**Structurally** the TF operates with the leadership of the Core Team, 4 Standing Committees, and task-specific Project Groups. This structure was designed by Core Team partners USAO,
Give Way to Freedom (GWTF), and the AGO, after careful consideration of the successes and failures from the last three years and a keen eye toward what promotes active engagement.

The **Core Team** provides leadership and guidance to TF efforts. Its responsibilities include but are not limited to: developing strategy and identifying priorities based on data and feedback from the Advisory Committee and Evaluator; setting goals and creating accountability for timely actions for Committees and project groups; and approving media releases.

The **Advisory Committee** is comprised of select key stakeholders representing diverse agencies and fields, and membership is by invite only. Its purpose is to provide input on statewide efforts, including challenges, gaps, and best practices. Providing a common place for stakeholders to convene helps maintains harmonious working relationships across sectors.

The **Law Enforcement Committee** is comprised of local, state, and federal law enforcement; county, state, and federal prosecutors; and federal labor investigators. It serves as a central location to discuss and de-conflict cases; share intelligence and coordinate investigations; provide training and technical assistance to members and other jurisdictions; and help develop case protocols and data collection.

The **Victim Services Committee** serves as a hub where providers can discuss challenges, gaps, and best practices. Through these discussions the Committee helps the TF identify and prioritize where to build additional capacity, partners, and leverageable resources throughout the state. Once per quarter the Committee also offers professional development to all members.

The **Training & Community Engagement Committee** is open to any TF member and is comprised of law enforcement, services, and others. It is responsible for developing shared materials, establishing content standards, delivering training to stakeholders, and identifying additional trainers for topics outside of TF member expertise.
Project Groups are short term, task-specific collaborations to address specific policy, protocol and system/infrastructure building goals. They are an additional way for law enforcement and services to work together, and may be comprised of members from both the Law Enforcement and the Services Committees and in some cases non-TF members with specialized knowledge. We have found that this is the best way to facilitate collaboration as well as achieve results in a timely manner.

Activity 5.4: Hold in-person task force meetings at least quarterly. The TF currently meets once per month, and will continue to do so. Meetings are always the 4th Thursday of the month, in the same location. We open the space 1 hour before each meeting starts and invite any new members to come early for an orientation, or project groups to use the time and space for work. We have found that this setup encourages maximum participation, while simultaneously cutting down on the number of meetings and scheduling conflicts. Moving forward every third meeting will be devoted to Committee work. Twice per year we will dedicate at least 1 hour of the 2 hour meetings to professional development. See Attachment 7 Time to Task.

Activity 5.5: Develop and update operational protocols that outline roles and responsibilities of members and the collaborative work of the TF. The TF has identified, and will develop, the following protocols to formalize, describe, clarify, and/or guide our efforts: Roles and responsibilities of law enforcement and services responding to incidents; referrals to and from law enforcement and services; responding to emergencies and after-hours referrals; information sharing including confidentiality and informed consent; collection, sharing, analyzing and jointly reporting data; using culturally and linguistically appropriate victim-centered and trauma-informed approaches during investigations and the delivery of services, including identifying, screening, and interviewing victims; victim rights and protections including: requests for
Continued Presence (CP) or other documents needed to support immigration relief, and coordination of services with victim assistance professionals in law enforcement or prosecutors’ offices; handling cases with large numbers of victims; investigative and prosecutorial protocols; working with the media; TF membership; training/outreach standards to ensure all forms of trafficking and all victims are addressed; fundraising to support goals and priorities.

Development of the protocols will be a collaborative effort under the direction of the Project Director. We will convene Project Groups to research and develop one or more of the listed topics. Each draft protocol will be reviewed by the Services Committee, Law Enforcement Committee, and Core Team. Each of the listed protocols will have a written draft by the end of year 2 at the latest. In years two and three we will review and refine each protocol. Additional protocols will be developed as needed, based on member feedback and experiences.

**Open Awards:** Although not the direct grantee, MPD is part of the Internet Crimes Against Children Task Force and receives funds from that grant in the form of overtime reimbursement. CFS has no open awards of any funding related to investigating, prosecuting, or providing services for victims of human trafficking.

**CAPABILITIES AND COMPETENCIES:**

*Experience and administrative or financial capacity to manage federal grants:*

**Manchester Police Department:** The City of Manchester, New Hampshire has an extensive financial accounting system, which is capable of keeping individual grants separate from each other as well as separate from general funds. Procedures are in place to ensure this separation of accounts. An independent audit is performed annually. A portion of the audit was designed to meet the requirements of the federal Single Audit Act and related OMB Circular 133. All funds awarded under this program will be accounted for separately and distinctly from all other sources.
of revenue/funding. Written accounting policies and procedures are in place. The financial management system is capable of tracking actual expenses and outlays with budgeted amounts. Each grant is setup as an individual project, which includes budget, expenses, outlays and funds received for reimbursement. Internal controls are in place to ensure at that all grant expenses are solely for authorized purposes. In addition, a quarterly budget status report is generated for the individuals responsible for administrative and programmatic functions of the grant.

**Child and Family Services** has managed federal grants since 1972, and has the demonstrated capacity to oversee federal grants. All federal reviews and site visits have been successful. Examples of grants received include in 2009, an American Recovery and Reinvestment Act to provide homeless prevention; and ACF grants for: Street Outreach, Manchester (since 1996); Street Outreach, Seacoast (since 2012); Transitional Living Program (since 1993); and specialized TLP for pregnant and parenting (since 2002).

*Fiscal controls* are demonstrated through their financial management system, which assures that positive financial outcomes are achieved through the receipt, disbursement, and accounting of funds consistent with sound financial practices. Accounting policies and procedures are in place to guide staff members who handle all financial matters including proper financial management practices, cash management, month-end processing and reporting, purchasing and property control, processing cash disbursements, grant contracting, and payroll.

Financial statements are prepared monthly and audited annually. CFS has no outstanding findings in its audit and conforms to all state and federal accounting practices including OMB A-133. CFS uses Blackbaud’s **Financial Edge** fund accounting software - an accounting management information system that establishes separate income and expenditure “cost centers” for each CFS service division on a monthly basis, creating accurate fiscal monitoring and
program management. Each month, income and expense statements (profit/loss) with budget comparison are prepared for each cost center and monitored by the Program Directors, CFO, CEO and COO. Statements are used to prepare reports required by funders.

Key staff responsible for management and implementation:

**Manchester Police Department** will be represented by:

Sergeant will provide supervisory support. He has been a member of the Manchester Police Department for over 17 years. He has been a Sergeant for over 7 years and has been assigned as the Domestic and Sexual Assault Unit Supervisor for over two years. He has received specialized training on human trafficking investigations, and investigated more than 10 human trafficking cases. Through his work he has extensive experience working with victims of crime and employing victim-centered and trauma-informed techniques.

**Investigator:** A full time investigator will be assigned. The investigator will have experience investigating human trafficking, and training in trauma-informed practices.

Business Service Officer, is the AOR and Financial POC for this project, and has the financial responsibility for this grant.

**Child and Family Services NH Key Staff**

MSW, is the Chief Operating Officer for CFSNH. He has more than 25 years of leadership experience in the non-profit sector with demonstrated success in agency operations, fundraising, talent management and strategic planning. His work has been focused on the most vulnerable populations in NH.

MA, LCMHC, is the Program Manager for the Runaway and Homeless Youth Program at CFS. She has over ten years of experience in human services, focusing primarily on adolescent and family services. She joined CFSNH in 2006 to focus on enhancing
the well-being of children and families. In 2008, she transitioned into runaway and homeless youth services, and currently oversees a continuum of runaway and homeless youth services that covers more than 15 NH communities. Through her experience working with runaway and homeless youth, she has encountered and worked with many victims of trafficking.

**Intensive Case Managers:** To be hired. Successful candidates will ideally have experience providing case management to victims of trafficking, but at minimum 1) hold a Bachelor’s Degree in Social Work or related field with three years of experience working with vulnerable populations; 2) have experience using a trauma informed approach; and 3) demonstrated success in working with community-based service providers. Additional qualifications are listed in the Job Description, Attachment 10. The ICM will provide case management for all victims in NH, and be supervised by [ ] with support from the Project Director Erin Albright. Between the two they have experience working with all victims, all ages, all nationalities.

[ ] Chief Financial Officer, has his BS in Business Administration from the University of New Hampshire. Since 1987 he has served in a range of general manager, controller, director of finance, and chief financial officer positions. [ ] brings over 25 years of experience that includes the management of operations for large nonprofit organizations, preparing, managing, and overseeing state, federal and other contracts.

**Give Way to Freedom:** [ ] Esq. is the Regional Program Director at Give Way to Freedom, and will be the Task Force Project Director. She has worked in the anti-trafficking field for over 8 years, in law enforcement and services. For 2.5 years she managed all data for the Boston Police Department’s Human Trafficking Unit, and the Massachusetts Trafficking Task Force. From 2011-2015 she managed TVAP for New England, including providing comprehensive, culturally appropriate and trauma-informed case management to foreign national
victims, overseeing the development of a network of service providers to do the same, and working closely with law enforcement and attorneys to strengthen supports for survivors. For the last 5 years she has also worked closely with Task Forces to build collaboration and capacity.

See Attachment 10 for Key Position descriptions and resumes

*Experience and expertise of key victim service partners:* (see also Attachment 4)

**Child and Family Services of NH** provides an array of services to vulnerable individuals including: mental health counseling; runaway and homeless youth services; eldercare; transitional and independent living; foster care; family counseling; adolescent substance abuse treatment; in-school social work; after-school programs for adjudicated youth; pregnancy counseling and prenatal supports & services. In addition, CFS has trained staff to meet the needs of lesbian, gay, bisexual, transgender and questioning youth through our street outreach, counseling and housing programs. With 14 office sites, CFS delivers 28 programs across the state-- addressing human need at every age and stage of life-- to an average of 21,000 children, youth and families, annually. Through its multiple programs serving vulnerable populations, CFS has served many trafficking victims. Although CFS has only recently begun to include trafficking in data collection, anecdotal evidence shows that this is true. Moreover CFS services employ a strength-based, client-centered, trauma-informed approach that is consistent with best practice for providing services to victims of human trafficking.

The **YWCA** and **Crisis Center Central New Hampshire** provide support to domestic and sexual violence survivors in Hillsborough, Rockingham, Merrimack counties. As such, and given the lack of dedicated trafficking services in those areas, they have received referrals for, and provided services to, trafficking victims for many years. Victims have been both U.S. Citizens and foreign nationals, and they have served both sex and labor victims. For example in 2014 the
YWCA provided advocacy and shelter for a foreign national labor trafficking victim while she pursued certification and immigration relief.

**International Institute of New England/New Hampshire:** Through a 2011 sub-grant from HHS, IINE became the New England Regional Service Coordinator for the HHS/ORR TVAP Program (TVAP) program, responsible for establishing and managing a network of qualified, subcontracted service providers throughout the region that provide comprehensive case management to foreign national victims of trafficking. In 2015 the program stepped away from regional coordination, and now focuses on providing comprehensive case management. Staff has been trained in identifying trafficking and using victim-centered and trauma-informed practices.

**New Hampshire Legal Assistance:** Through its employee, [redacted], Director of Fair Housing Project, NHLA has provided legal services to trafficking victims including immigration, benefits, fair housing, and family law matters. She has successfully represented six foreign national victims in NH in applying for T-visas, and many other victims in applying for U-visas. She has worked with trafficking victims – both sex and labor, male and female – for over four years, first at Catholic Charities and now at NHLA.

**Plan for supervising case managers and direct service staff:** Case managers and other direct service staff supported by the project will be supervised by [redacted] weekly, alternating between individual meetings and group meetings. They also have access to agency supervisors 24/7 days a week, and the Project Director will provide technical assistance as necessary.

**Plan that describes how those coming in contact with minors will be screened:** For all direct service staff and others, including volunteers, coming into contact with minors, CFS or one of the law enforcement partners will perform a criminal background check, a driving record check, and a query check with DCYF to identify any history of child abuse and/or neglect.
Manchester PD, in collaboration with lead federal investigation partner Homeland Security Investigations, the United States Attorney’s Office, and members of the Law Enforcement Committee (LE Committee) including NH State Police, Nashua, Salem, Hampton, and Portsmouth PDs, the Attorney General’s Office, the Hillsborough County Attorney’s Office, and the Department of Labor Wage and Hour Division, will conduct proactive activities with the intent to increase the identification of cases and victims, investigations, and prosecutions of both sex and labor trafficking within the state of NH.

The law enforcement team will be anchored at the local and state level by Manchester Police Department through a full-time dedicated MPD Detective, Sergeant [REDACTED], will have supervisory responsibilities, and 6 current detectives will contribute an average of 5 hours a week in order to investigate cases statewide. The assigned Detectives will exercise primary jurisdiction over applicable state laws, and HSI Special Agents will exercise jurisdiction over federal law. Jurisdiction will not be a problem, as state law allows for any law enforcement officer to make arrests state-wide, and the detectives will seek deputization in each NH county. Deputization will allow both local and federal law enforcement officers to exercise arrest authority for state offenses, state-wide. This is a common scenario throughout NH, given the number of small and rural police departments that lack the capacity for more complex investigations. Additionally, the New Hampshire State Police (NHSP) will participate in order to further ensure state-wide jurisdiction. Finally, HSI will train and certify key law enforcement personnel to be federal task force officers (TFO). TFO credentials will authorize the law enforcement officer to enforce federal law outside of New Hampshire, when necessary.

The assigned Detective will be partnered with HSI Special Agents, as well as Detectives.
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Further, the law enforcement team will be equipped with computer forensic support provided by HSI and the NH Internet Crimes Against Children's Task Force. Collectively, all of these partners comprise the Law Enforcement Committee (LE Committee), which serves as a central location to discuss and de-conflict cases; share intelligence and coordinate investigations; provide training and technical assistance to members and other jurisdictions; and help develop case protocols and data collection. The LE Committee is led by Manchester Police Department, the USAO, and ICE/HSI, and will meet on a quarterly basis.

The LE Committee will develop proactive and long-term investigations by targeting areas throughout New Hampshire that are at risk for human trafficking activity. It will begin with a comprehensive, state-wide threat assessment for both sex and labor trafficking. Directed by the results of the threat assessment as well as historical and other data, it will utilize a variety of investigative techniques, from undercover operations to overt techniques to combat the issue. Further, law enforcement will utilize its broad array of investigative authorities, from drug trafficking investigations to financial investigations to labor investigators, to target those who facilitate, or benefit from human trafficking activity.

For sex trafficking we will target areas in which commercial sex activity and drug trafficking are common, as identified by the threat assessment, in order to develop long-term, proactive investigations. For labor trafficking we target areas of vulnerability identified by the threat assessment, and will work with DOL WHD and recruit other labor and code compliance inspectors who have more access to vulnerable labor environments and, with training, better
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Capability of identifying labor trafficking within their daily responsibilities. Additionally, major events throughout the state, such as NASCAR races and Bike Week, will be targeted due to their connection to an increased sex trade, and the increase in contract workers at hotels and travel sales vendors that are vulnerable to labor trafficking.

The LE Committee will coordinate all efforts, and engage in aggressive outreach and education to increase awareness of human trafficking in NH. The information received both from the law enforcement and multidisciplinary partners, as well as from the general public, will improve as a result. These sources of information will lead to additional long-term, proactive investigations. Specific initiatives include:

A. **Targeted outreach/awareness/training initiatives:** The TF and LE Committee have a five part plan for targeted training and outreach for law enforcement and investigators, designed to increase the identification of cases and victims, investigations and prosecutions of both sex and labor trafficking.

First, in Year 1 we will seek to incorporate human trafficking, sex and labor, in the academy curriculum. We will do this by adapting our existing basic training (see Attachment 5) for a law enforcement audience, and then by working with Police Standards and Training to incorporate it in the academy curriculum. By doing this we will ensure that future officers all have at least a basic ability to identify potential cases of both sex and labor trafficking.

Second, we will engage and provide basic training to police departments throughout the state. On any given day law enforcement in NH encounters potential human trafficking victims while not necessarily pursuing human trafficking leads. In a typical situation, law enforcement may encounter these individuals during the course of investigating, or responding to other incidents such as drug trafficking, or motor vehicle violations. Although the Manchester Police
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Departments maintains a Detective Unit dedicated to investigating trafficking, the referral and handling of potential human trafficking situations is, at times, disjointed. Trainings will target not only those law enforcement officers that investigate human trafficking, but those that investigate other offenses, and those who may encounter human trafficking through their regular course of duty such as at traffic stops. The LE Committee will prioritize audiences/jurisdictions based on the results of our threat assessment, historical case locations, and the results of our Baseline survey (See Attachment 2, Project Narrative and Attachment 5, Training Plan). By increasing human trafficking awareness throughout NH law enforcement, better intelligence will be shared with those dedicated to investigating human trafficking.

Third, we will continue to build the capacity of our LE Committee to stand as a team of investigators with advanced skills that can act as points of contact for their respective jurisdictions, and/or provide technical assistance and investigative support to other jurisdictions. We will do this by 1) inviting agencies that have received the basic level training to participate in the LE Committee, and 2) providing professional development training to LE Committee members. Advanced level professional development training targeting the LE Committee will occur at least semiannually, and will include trauma informed interviewing, psychology of addiction, case studies from successful cases that were investigated both locally and out-of-area, as well as best practices that enhance investigations and prosecutions of labor and sex trafficking. The existence of this team to support investigations is especially important for our statewide approach, as many of the smaller jurisdictions do not have capacity to actively participate in the LE Committee or investigate cases.

Fourth, the LE Committee, through member DOL WHD, will enhance our outreach to labor investigators at the state level and others in positions to identify instances of labor trafficking.
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Through these targeted outreach and training efforts, the LE Committee will increase awareness within the law enforcement community. This will help us engage in proactive and long term investigations because increased awareness will breed better investigative referrals, and will further develop expertise amongst the law enforcement community.

B. **The development of new partnerships and information sharing initiatives with federal, state, local and tribal agencies**

Through the targeted outreach and training described above, the TF will develop new partnerships and information sharing initiatives to enable and support proactive investigations. Agencies that join the LE Committee will be asked to sign an MOU that includes basic provisions on information sharing, and adhere to any information sharing policies and protocols developed by the TF. The LE Committee will continue to meet quarterly, providing a forum for partners to share information. These meetings will include sharing data and analysis from PMT. In addition, anticipating that resources might prevent some police departments from active engagement, the LE Committee will serve as a point of contact for information sharing, investigative assistance and technical support.

We will also devote specific attention to two areas of critical partnerships. First, by developing new partnerships and information sharing initiatives with federal, state, and local labor investigators and stakeholders. In October 2015 we established a new partnership with DOL WHD, and in December 2015 we trained all of their investigators for New England on identification of trafficking. WHD is now a member of the Task Force, and will assist in
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outreach to establish partnerships and information sharing activities with local and state level investigators and stakeholders, thereby building capacity to ensure labor receives equal identification and attention as sex trafficking. The Law Enforcement partners in the Core Team, the Project Director, and the representatives from WHD will work together to establish information sharing protocols that align with TF objectives but preserve each agency's mandate.

Second, with the opiate epidemic, we are seeing a substantial number of cases involving heroin as the means of coercion. In one case, the trafficker stood by holding a bag of heroin while the victim was vomiting in the trash can, and told her she could only have it if she got back to work. We will work with the DEA and drug units to provide training and share information so that they can identify potential trafficking during the course of their investigations, and refer such instances to the LE Committee or appropriate person within their Police Department.

Finally, understanding that an effective approach includes collaborations outside of law enforcement, Manchester PD, HSI, the USAO and the LE Committee will work with the Services Committee and multidisciplinary partners to address drug addiction and mental illness associated with human trafficking. This approach will not only put the immediate needs of the victim first, but will cultivate reliable and cooperative witnesses to further the investigation. This will also extend to developing relationships and partnerships with allied professionals poised to identify labor trafficking including the Restaurant and Lodging Association and its members.

The development of additional partnerships will increase both the volume and quality of investigative referrals. Moreover, it will enable law enforcement to utilize a wider variety of investigative resources to combat human trafficking. This will help us engage in proactive and long term investigations because we will be able to leverage the intelligence and expertise that is being collected through other types of investigations, to include drug trafficking and
C. Through the **improvement and sustainment of investigative & intelligence gathering methods.** In this area the Task Force will do three things:

First, we will provide professional development training designed to improve investigative techniques, as described above. The long term result will be a core group of advanced investigators across the state that can act as point person for their respective jurisdictions, and/or provide technical assistance and investigative support to other law enforcement.

Second, establish a coordinated intelligence effort by developing a partnership with the NH Information and Analysis Center (NHIAC) as a clearinghouse for intelligence. The NHIAC is a New Hampshire State Police (NHSP) led initiative. Through NHSP participation on the LE Committee, the NHIAC is already being consulted to further human trafficking investigations in NH. Law enforcement is coordinating with the NHIAC to discuss ways to distribute human trafficking intelligence. One example is the development of intelligence notes for state-wide distribution. To date, three such intelligence notes have been distributed. Efforts such as this will help both improve and sustain intelligence gathering.

Third, through data-driven self-assessments including case debriefs at quarterly LE Committee meetings to identify successful and unsuccessful strategies; data collection, analysis and sharing with law enforcement partners; and working with the Evaluator to incorporate investigation-related questions into the annual evaluation efforts. The information from all of these efforts will be used to identify gaps and areas for improvement, which the TF will then take steps to address through trainings, new or amended protocols, and other appropriate actions.

The LE Committee, to include the NHIAC, will meet quarterly in order to discuss case progression, as well as to develop new intelligence streams. This will help us engage in proactive...
D. **Improvement of info sharing protocols with victim service providers**

At present, the Task Force provides a forum for victim services providers and law enforcement to share information on a monthly basis. These relationships and processes will be further formalized in the following ways should this grant be awarded to the NH Task Force.

The leadership of the LE Committee will work with the Project Director and Service Provider lead to create a formal information sharing policy and protocol applicable to all Task Force efforts. This document will address issues including, but not limited to, professional and legal responsibilities related to confidentiality and information sharing; handling tips made to task force members; referrals to and from service providers; what type of information is appropriate for open sharing and what is not; and a method for conflict resolution. As part of the process of improvement the TF will discuss and clarify roles, expectations, and challenges, and we will continue to look to the OVC e-guide for tips as to best practices and strategies other Task Forces have used to guide information sharing between members. In addition we will hold regular Case Review meetings separate from Task Force meetings, for only those actively involved in a particular case. We will develop a specific protocol for these meetings.

Consultation and coordination between the LE Committee, and the victim service providers is essential to creating a victim-centered, trauma informed environment. Human Trafficking investigations can only be successful with stable and reliable victims. In order to attain these types of witnesses, law enforcement must work closely with victim service providers. This will help us engage in proactive and long term investigations because it will facilitate victim cooperation with law enforcement.
E. **Enhancement of prosecution strategies through a two pronged effort**

In New Hampshire, human trafficking cases are currently being prosecuted in a vertical manner. Law enforcement involves the prosecuting agencies, whether that be the USAO or the County Attorney, during the early stages of the investigation in order to develop a methodical and coherent investigative work plan. We will enhance this first through continued collaboration with prosecution offices, increased prosecutor participation in the LE Committee, and prosecution-specific case reviews/deb briefs on at least a semi-annual basis that discuss pros, cons, challenges, and strategies.

Second, we will enhance prosecution strategies through more training and connecting with expertise nationally. Training will help local and state prosecutors identify human trafficking and prosecution techniques. Included in this will be recognition of a point person for each prosecutor’s office to whom cases and potential cases can be referred to ensure that cases do not move through the legal system unidentified. We will look to the DOJ Human Trafficking Prosecution Unit, other Task Forces and other prosecutorial training resources such as Aequitas for expertise and training support.

F. **Implementation of trauma-informed victim interaction and interviewing practices**

Reliable and stable witnesses are crucial to a successful Human Trafficking investigation. Victims and other witnesses are typically apprehensive about cooperating with a law enforcement investigation. Understanding trauma that the victim has previously experienced will help the investigator build rapport in order to cultivate cooperative and trustworthy witnesses. To that end, the LE Committee will focus training efforts to address the importance of a trauma-informed approach. It will leverage local expertise that has been developed during human trafficking investigations combined with service provider expertise from the many service
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provider partner that have expertise on trauma-informed practices. Further, the LE Committee
will host an HSI Forensic Interviewer to train law enforcement.

It will also work with the Project Director and Service Committee to draft and issue
investigative guidelines that outline best practices in which to engage when investigating human
trafficking. Those guidelines will focus heavily on the importance of a trauma-informed
approach.

The implementation of trauma-informed victim interaction and interviewing practices will
increase the number proactive and long term investigations. These practices will enable the
investigator to develop more reliable and stable witnesses to support the criminal prosecution.
Plan for Delivery of Comprehensive Services for all Victims

The Task Force, through the service provider partners, uses a coordinated, community-wide response (CCR). By using a CCR we are able to best leverage a variety of local, state, and federal resources. The CCR is anchored in Hillsborough County, the largest county in the state. It currently extends into two of the adjacent counties – Rockingham and Merrimack. Because services are not necessarily constrained by county lines, and because victims often move depending on available shelters, safety concerns, and/or service needs, the partners across these 3 counties are able to provide a comprehensive array of services for sex and labor victims of all ages, sexes, foreign nationals and U.S. citizens. For the purposes of demonstrating a comprehensive array of services, and in consideration of page limits, this plan focuses on the services in Hillsborough County and, for key services, Rockingham and Merrimack Counties.

Funding is necessary because although we can provide an array of services in those three counties, and we have the interest and commitment of many service providers across the state, we still face the fundamental issue of no dedicated programming or staff. This means that victims are often navigating the system on their own and when they do access services it is through programs not designed for, and thus not fully familiar with, their service needs. Referrals from stakeholder end up scattered across a range of agencies, most of which lack capacity, and in some case are ill suited to support survivors. In one case, undocumented survivors were referred to a community agency with no experience working with trafficking victims. This agency organized a public march on behalf of the victims that ended at the business place of the perpetrators. Even case managers with experience working with trafficking victims often lack the time to engage and develop the necessary connections and provide training that would build capacity. The need for services must to be matched by enhanced capacity that comes from
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dedicated staff to assure that referrals, system coordination, and training happen purposely,
ensuring fidelity to trauma-informed systems of care.

Results from our Baseline Survey (See Attachment 2, Project Narrative) indicated that 52%
of professional stakeholders across the state were unaware of resources to support victims of
trafficking. 28% knew of some resources, and only 20% of the 416 respondents indicated a
stronger knowledge of resources available for victims. This supports the need for dedicated staff,
as efforts to resolve this by identifying additional partners, formalizing a referral process,
developing protocols and gathering data to inform our efforts have repeatedly been stymied by
the fact that no agency or person has the ability to dedicate enough time to manage such projects.

Thus funding for this project will allow us to formalize and enhance our existing partnerships
in Hillsborough, Rockingham, and Merrimack Counties, and build capacity in the rest of the
state through the efforts of dedicated staff. It will support a full time Project Director, who will
work alongside all members to build statewide capacity through the identification of new
partners and resources, stakeholder trainings, protocol development, and data collection and
evaluation. It will enable us to hire two full time Intensive Case Managers (ICMs) that can
provide intensive case management to all survivors, act as points for referrals, and engage in
outreach to existing and new partners to identify additional resources alongside the Project
Director and other members.

**CFS as the lead:** Child and Family Services of New Hampshire (CFS) is the applicant and
lead service provider for the TF. CFS is a nonprofit organization, founded in 1850, that currently
aids more than 14,000 individuals, statewide, through 28 programs and 16 office sites. Its
statewide presence, lengthy history of providing services to diverse populations vulnerable to
trafficking (including runaway and homeless youth, families, eldercare, and adults with
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The two ICMs will be employed by CFS, and located in Hillsborough and Rockingham Counties.

**The Task Force Services Committee supports the CCR.** Continued development of the CCR is shared by CFS, the Services Committee and Project Director. The Committee is led by Core Team members from CFS, and Victim Witness Coordinator at the USAO. Committee membership is comprised of agencies that provide direct services within the CCR, umbrella organizations that represent groups of direct service providers that are part of the CCR, and agencies that would like to build their capacity to provide direct services to victims.

**Plans to build out the CCR:** With the benefit of dedicated staff, including the Project Director to devote time and management of efforts, the Task Force will engage in a resource and service mapping project to build out the CCR. As described below, we have a strong and comprehensive array of services in across Hillsborough, Rockingham, and Merrimack Counties. As demonstrated in the MOUs, we also have several committed partners outside of those counties, and as described above we intend to enhance those existing services and build capacity to provide a comprehensive array of services statewide. The mapping project will identify services, assess capacity and experience working with trafficking victims, and identify agencies that need/want training in order to work with, or improve their work with, trafficking victims across the state. This project will continue throughout the 3 year project period, with the goal of maximizing resources and leveraging existing supports. In addition to the Project Director’s time, ICMs will contribute to this project as they identify new resources through their regular case management efforts, and other TF members will also contribute time and knowledge.

**Services for all victims:** The existing CCR provides services to all victims – male, female,
Experience of Key Service Partners (continued from Project Narrative): Many service provider partners that comprise the CCR have no documented experience working with trafficking survivors. What service provider partners do have is a wealth of experience providing high quality services to other vulnerable populations such as runaway and homeless youth, domestic violence survivors, individuals with substance use disorders, and immigrant populations. And while we know that the needs of such populations can different – at times radically so – our service provider partners have recognized the need and are committed to working together to adapt and build capacity to provide services to all trafficking survivors. A prime example of this dedication are the Child Advocacy Centers (CACs). Traditionally they serve only children, but recognizing the needs of trafficking victims have begun to provide forensic interviews to adult trafficking victims. Another example is Elliot hospital. Recently we had a case where a victim was about to be discharged from medical detox, when at the last minute the residential program to which she was going had to postpone her enrollment. Through the efforts of the HSI Victim Assistance Specialist and Give Way to Freedom we identified two other programs that agreed to make space available for the interim period, despite the fact that such actions did not follow their established procedures. Ultimately the staff at Elliot stepped forward and offered to allow the victim to remain there. Given the choice, the victim chose to remain Elliot. This demonstrates the willingness of partners to adapt and provide support. In order to realize the potential therein, the commitments and interest must to be matched by the enhanced capacity that comes from dedicated staff to assure that referrals, system coordination,
Other funding: Currently there are no other OVC funded trafficking services in NH. The only trafficking-specific funding from either the state or federal level is through the HHS/ORR TVAP program, and is exclusively for non-citizen, non-Legal Permanent Resident (LPR) victims seeking certification. In accord with OVC and ORR policies, all pre-certified victims will receive services from the OVC funded program, and be transferred to the ORR funded program upon receipt of certification. CCR member IINH has an MOU with TVAP grantee U.S. Committee for Refugees and Immigrants (USCRI) to provide comprehensive case management under the TVAP program. The Project Director will provide training and technical assistance on the transition and differences between the 2 programs to ensure no duplication of funds.

Non-trafficking funding: Other non-trafficking specific state and federal funds will be used, in whole or in part, to provide services. This funding includes, but is not limited to, state funding through the Department of Health and Human Services to provide intensive home based counseling, respite and foster care and mental health and substance abuse treatment for victims and their families. Funding through the Federal Family and Youth Services Bureau can provide transitional living and case management services for young adults ages 18-21. Additional details are provided as relevant below.

SERVICE DELIVERY

Comprehensive service model: We will employ a victim-centered and trauma-informed Comprehensive Service model, grounded in intensive case management and individualized service plans that are tailored to meet victims’ identified needs. The model prioritizes victim safety and stability, leading to the goal of autonomy and economic self-sufficiency. Our CCR is a collaboration that brings together existing community resources and initiatives to ensure a
comprehensive array of services for victims and maximize resources. Many of the services are available at no cost, or through insurance to survivors of trafficking. Funds from this grant will be used to hire 2 full time ICMs, which the TF has identified as the critical gap in services statewide, as well as other gaps in the existing services in the short-term aftermath of victim identification, until the victim is able to access other federal, state or local programs for which they may be eligible.

**Intake/eligibility assessment** will be provided by OVC funded ICMs at CFS. All referred cases will go through an intake and eligibility assessment. The intake will be the existing CFS intake, adapted it to include any information required by TIMS that is not part of the existing intake, as well as questions that screen for trafficking because we know that not all cases arise via referral and most victims do not self-identify. The screening questions will help identify whether someone has been subjected to a form of severe trafficking in persons, as defined by federal law, 22 U.S.C. § 7102(9), and is thus eligible for the program. All CFS intake staff, as well as service provider partners and TF members will receive training on this definition. All victims will be encouraged to report to and assist law enforcement. Per current OVC rules, adult victims will be required to cooperate with reasonable requests from law enforcement on the investigation or prosecution of trafficking in persons. We will work closely with Manchester Police Department (MPD) and the Law Enforcement Committee to create a process that is trauma-informed and does not negatively impact or re-traumatize victims. Where we have concerns about such consequences we will seek an exception from OVC. Minors will be encouraged, but not required, to assist law enforcement.

**Intensive case management** will be provided by OVC funded ICMs at CFS for all victims – sex, labor, male, female, adult, youth, U.S. citizen and pre-certified foreign nationals, regardless
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Intensive case management will be embedded in the Manchester (Hillsborough) and Portsmouth (Rockingham) CFS sites, but delivered statewide as necessary through CFS’s other sites. These 2 locations were chosen because they are large cities within the 2 biggest counties, where over 50% of victims have been identified. The two ICMs will provide a single point of contact and coordination for survivor services and referrals. CFS will bring together the experience and expertise of its other services for vulnerable populations, including runaway and homeless youth, families, eldercare, and adults with disabilities, to ensure access to robust and high-quality “wraparound services” that meet victims where they are and helps to express their choices while working through the trauma of the situation and interacting with the necessary local and federal partners. CFS and the Project Director will also provide training and professional development to CFS staff and other interested stakeholders state-wide to build capacity for intensive case management and working with trafficking victims.

The core of intensive case management will be the individualized service plan (ISP). Using the intake/needs assessment as a starting point, ICMs and victims will work together to develop an ISP which readily identifies survivor goals, action steps, and timelines towards goal.
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achievement. All ISPs will be developed with the overarching goal of moving the victim towards increased autonomy, self-sufficiency, increased feelings of safety, and improved well-being while insuring all needs are met. Case managers will meet with the victim at least once a week during the first month of service to identify and address emerging issues and basic needs. ISPs will be reviewed with the victim once monthly or more to assess progress and to identify and plan for emergent service needs. Case management sessions will reduce in frequency as the victim’s housing, financial, legal, and emotional needs stabilize.

Shelter/housing: The plan for shelter and housing includes access to a variety of emergency and transitional shelters, and group and independent living options. Partners for housing are located statewide, as we often encounter safety or other concerns for victim remaining in the county in which the crime occurred. Victims will continue to receive intensive case management from one of the two ICMs regardless of their location, and ICMs will be able to receive support in identifying local resources from the CFS site closest to the shelter location, as well as other members of the TF and CCR. The project will leverage the availability of other trafficking-specific group and transitional shelters in the New England region as necessary and available. For example, clients may be given the option of relocating to a shelter outside of Boston if space allows. Specific shelter and housing supports include:

Emergency housing in Hillsborough will be provided for adult women by the YWCA at no cost to the grant, and by Families in Transition for all adults. In Rockingham, Cross Roads, Inc. (Cross Roads) will provide emergency shelter to men, women, and families at no cost to the grant. In Merrimack, the Crisis Center of Central NH will provide emergency housing for all victims at no cost to the grant. In some instances, including male victims, this may include several nights at a hotel, with the cost covered by VOCA emergency funds, thus at no cost to the
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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims grant. For more information on the services provided by these partners see Attachment 13, MOUS with Victim Service Partners.

**Transitional housing** will be provided in-house at CFS and through MOUs with partners as follows: For youth under 18, at no cost to the grant through CFS existing MOUs with several residential facilities and licensed foster homes including: Chase Home, Dover Children’s Home, Spaulding Youth Center, NFI and Webster House. For youth 18-21, through CFS Transitional Living Program in Hillsborough, Rockingham/Strafford, Merrimack and Grafton counties, at no cost to the grant. This is a 12-18 month program that provides supportive housing, life skills training and support services to young people who are homeless or transitioning out of foster care. The program is designed to promote self-sufficiency and reduce the risk of future homelessness. Funding is provided through a variety of sources including: Administration for Children and Families (ACYF/FYSB), HUD, NH DHHS and charitable awards.

**Cross Roads** will provide transitional living support to men, women, and families in Rockingham and Strafford Counties at no cost to the grant. **Families in Transition** will provide transitional living support in the form of affordable housing and support services in Hillsborough, Merrimack, and Rockingham counties and for all adult victims except those that are undocumented. The ICMs will work with immigration attorneys and the Project Director to pursue Continued Presence for any undocumented victim, but can also refer victims to Cross Roads in the event that immigration status is a barrier. The cost to participants at Families in Transition is 30% of their income.

**Group and independent housing:** YWCA will provide independent living support for women support for women and men over 18 in Hillsborough and Rockingham Counties at no cost to the grant. **Crisis Center of Central NH** provides group living housing to adult women in
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Merrimack County at no cost to the grant. For foreign national survivors, the International Institute of New Hampshire has relationships with several landlords in Manchester and Nashua and can help find appropriate apartments for victims. ICMs will help all eligible victims apply for rental and other housing assistance.

We have allocated $135,000, or $45,000 per year, to provide housing support – including transitional housing and independent living – over the 3 year project period. This includes 2 months rent and security deposit for 20 victims, at the local rental rate in Manchester. This will provide victims with immediate access to safe housing while case managers work with local housing agencies to provide permanent housing to victims. Where possible, such as once the victim is employed the cost will be shared by the victim as part of the transition to independence.

Not all victims will need such support, and some may not need the full amount.

**Sustenance and other basic needs** will be provided through an array of food pantries, public benefits, and donations. ICMs will help victims apply for SNAP benefits. CFS runs a drop-in center in Hillsborough that provides food. Task Force member Episcopal Church of New Hampshire has congregations statewide that operate food banks. Several of our partners also provide sustenance support, as documented in their MOUs. See Attachment 13. In addition, we have allocated $3,000 per year for sustenance, calculated at $100 each for 30 clients, for a total of $9,000 over a three year period. This will provide victims with immediate access to necessary items while case managers work to connect them with local food pantries and other resources within the community as needed.

**Medical:** Emergency and urgent medical issues will be handled by taking the victim to the closest emergency room or urgent care center. For all other medical care, ICMs will make referrals based on the victim’s location and circumstances, such as insurance considerations.
ICMs will work with victims to enroll them in state sponsored health insurance plans or connect them with local health clinics and mental health centers.

Partners for medical care include: in Hillsborough, Manchester Community Health Center will provide high quality, comprehensive, family-oriented primary health care services to meet the needs of a diverse community regardless of age, ethnicity, or income. Costs for these services are covered by insurance, at no cost to the grant. In Rockingham, Families First will provide integrated office based medical and dental services, pregnancy counseling and reproductive health and STI services to all victims. These services will be covered by insurance for most victims, and on a sliding scale for uninsured victims.

In Merrimack, partner Crisis Center of Central NH has a long history of collaborating with Concord Family Health (CFH) to meet the needs of victims of domestic and sexual violence and human trafficking. CFH provides comprehensive primary, preventive, behavioral health and dental care to uninsured, patients with mental illness or social stresses, people living in poverty and refugees, and women in need of reproductive health care. All services are provided regardless of ability to pay, with financial counselors on-site to assist patients with applying for financial assistance and Medicaid. ICMs will refer victims in Merrimack County to Concord Family Health, and we will reach out to include them via MOU in our CCR.

We have allocated a 3 year total of $15,000 for healthcare related expenses including medical care, mental health care, dental care and substance abuse treatment. These services are paid for by insurance for most victims, and most costs are fully covered by insurance. The allocation of funds is for uninsured clients and medical expenses not covered by health insurance such as: co-pays, deductibles, and dental care. This will provide victims with immediate access to health care while case managers work to connect them to state sponsored health insurance.
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plans or local health clinics and mental health centers. This allocation will also cover sliding scale fees. Because most victims are unemployed or in low wage jobs, and with the expansion of Medicaid in NH, we do not anticipate exorbitant fees. The cost was calculated based on supporting 10-15 clients per year, at an average of $500 per client.

**Dental** care will be provided by referral at no cost to the grant. Costs will be covered by insurance or by **pro bono** support (to be recruited). Project partners have several dental referral partners to use, depending on a victim’s insurance. These include Dental Connections, Family First Dental, and the Easter Seals Dental Clinic for victims that have Medicaid, and Small Smiles for children with Medicaid. Partner **Families First** also provides dental care. For victims that do not have dental insurance, the Project Director will work with the Task Force faith-based and community partners to recruit **pro bono** services from their congregations and connections. For any other costs we have included dental costs in our total healthcare allocation, described above.

**Mental Health** counseling services will be provide by **CFS** in-house for children, youth, and adults, couples and families. Funding for this service comes from insurance reimbursement and charitable donations. For victims over 21, and those requiring more intense support, CFS will make referrals to partners as follows: In **Hillsborough**, **Manchester Community Health** will provide assessments, individual counseling, and medication management among other services. Funds for these services are largely through insurance, at no cost to the grant. For uninsured case managers will work to enroll victims on state sponsored health plan and/or apply to victim’s compensation for reimbursement for mental health services. Also in Hillsborough, the Mental Health Center of Greater Manchester will provide emergency mental health assessments, counseling, and group therapy. These services are covered by insurance, and the Mental Health Center will assist victims in applying for insurance. In **Rockingham** **Families First** will provide
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Mental health counseling through insurance or a sliding scale fee for uninsured. For costs outside of insurance we have included mental health in our total healthcare allocation, described above.

**Interpretation and Translation** will be provided through a combination of trained volunteers and Language Bank at partner Ascentria Care Alliance to ensure all victims receive linguistically appropriate services. The grant has allocated $1650 per year for interpretation and translation services. Volunteers will be recruited by outreach through our faith-based and university partners, and they will receive training on confidentiality and providing interpretation by the Project Director.

**Substance Abuse Treatment**, including assessment, outpatient counseling, and recovery support, will be provided in-house by CFS at no cost to the grant for youth 12-24 and their families in both Hillsborough and Rockingham. Other partners in Hillsborough include Manchester Community Health Center and Elliot Hospital. Manchester Community Health Center will provide services including screening, brief intervention and referrals to treatment. In addition Manchester Community Health provides licensed alcohol and drug counselors on site for substance use counseling for patients and can provide referrals to other community services offering higher levels of care for substance use treatment. Costs for these services are covered by insurance, at no cost to the grant. Uninsured patients can access services through the NH Bureau of Drug Abuse Services. Elliot Hospital provides beds for medical detox. At present this is an informal agreement, established by ICE/HSI and the ER staff. Over the course of the project period we will look to formalize this arrangement, and replicate it at other hospitals.

**Families in Transition** will provide substance use treatment to women in Hillsborough and Rockingham. This service is covered by insurance. For costs outside of insurance and these programs we have included substance abuse treatment in our total healthcare allocation.
Moreover, we note that, as stated in the Narrative, substance abuse has become a significant challenge in NH. The state faces one of the worst opiate epidemics in the country, and "...is second to last, ahead of only Texas, in access to treatment programs. New Hampshire spends $8 per capita on treatment for substance abuse. Connecticut, for example, spends twice that amount."\(^1\) The state is in the midst of implementing a comprehensive plan to build capacity for such treatment, and we will work with the Governor's Commission on Alcohol and Drug Abuse Prevention, Treatment, and Recovery to engage stakeholders and identify additional treatment and recovery supports throughout the 3 year project period.

**Assistance with HHS certification** will be provided through the OVC funded Project Director Erin Albright, and the two ICMs. Attorney Albright managed the TVAP program, which supports foreign national victims seeking certification, for all of New England for the past 4 years. She is well versed in the process of certification, including coordination with law enforcement and allied experts to obtain documentation necessary to achieve ORR certification and assistance in coordination with federal law enforcement to request CP. She will work with immigration attorneys during this process. The two ICMs will provide assistance in obtaining necessary documents to support the victim’s application for services and programs for which they may be eligible.

**Victim Advocacy/Rights** will be provide by OVC funded ICMs as part of intensive case management. This includes accompaniment to court-proceedings, assistance in applying for benefits such as victim’s compensation. It also includes coordination/working with law enforcement victim specialists and advocates, including the Department of Homeland Security

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ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims

Victim Assistance Specialist, the Victim/Witness Coordinator at the U.S. Attorney's Office; and the Office for Victim Assistance at the NH Attorney General's Office. When relevant, State SART Coordinator, will help case managers and victims connect with the SART team in the appropriate region. For sexual assault forensic medical exams the ICM will work with Weeks from the NH Coalition Against Domestic and Sexual Violence.

**Life Skills** will be provided to all victims in house by OVC funded staff as part of intensive case management, and through in-house referrals to CFS independent living skills workshops offered at our drop-in centers and as part of our transitional living program. These workshops are funded by Administration for Children and Families, fundraising activities and charitable grants. These services include, but are not limited to, developing healthy relationships, managing household budgets, understanding program expectations, parenting classes, and self-care classes. Many of our service provider partners also provide life skills supports, and will do so as appropriate at no cost to the grant. For specific agencies see Attachment 13, Service Provider Partner MOUs.

**Literacy, job training, skills** will be provided through MOUs with partners at no cost to the grant. **Goodwill Northern New England** (Goodwill NNE) will provide job training and employment assistance for victims in Rockingham and Merrimack Counties that are considered an eligible homeless family, as defined by current Job Connection services program offered in partnership with Families in Transition. These services are delivered with an understanding of the barriers vulnerable populations often face in finding and keeping employment, and combine social work best practices and skilled workforce development tactics in order to ensure successful, long-term employment for each person served through this specialized service.
IINH will provide job training and culturally appropriate ESOL classes for foreign national victims in Hillsborough. ESOL classes are funded by the state, and IINH has contributed classes for 3 victims, for a total of $3585 in in-kind matching funds per year. Job training is funded by a mix of federal sources through ORR and DOL and other state and private funds and will be provided at no cost to the grant. For GED assistance, ICMs will make referrals to the Workforce Investment Act programs. For Hillsborough this is NH Jobs for American Grads (NH-JAG), and My Turn in Rockingham.

Employment Assistance will be provided through in-house referrals to CFS Street Outreach Program for youth ages 18-21 at no cost to the grant. Funding for this comes from HHS Administration for Children and Families, Family and Youth Service Bureau as well as charitable funding and in Manchester some city funding. Goodwill Northern NNE will provide employment assistance at no cost to the grant in Rockingham and Merrimack Counties for victims that meet program eligibility requirements stated above. To increase long term success, Goodwill support will not end when the job is secured. They will continue to work with victims until they are secure in the job and building personal stability.

Partner IINH will provide employment assistance at no cost to the grant, which may include vocational training, literacy training contextualized to a work setting, employment match programs, or transitional job programs, for all foreign nationals in Hillsborough through existing services funded by a mix of federal sources through ORR and DOL and other state and private funds. IINH currently provides these services to refugee and immigrant populations in Manchester and its surrounding communities, and to trafficking victims enrolled in TVAP. IINH also holds strong relationships with career centers and employment training programs throughout the state that can be leveraged for foreign national victims outside of the Manchester area.
Transportation will be provided using a variety of methods. OVC funded ICMs will provide transportation as part of intensive case management. In addition to staff time, 30 victims will be supported with gas cards, bus passes or taxi fare for local travel to attend meetings, doctor appointments, court appearances, job interviews or other travel needed to support safe, independent living. We have allocated $75 per year for 30 clients, for a total of $2,250 per year, or a 3 year total of $6,750 for this transportation. Several project partners including Manchester Community Health, DCYF, and YWCA also provide transportation assistance and will continue to do so at no cost to the grant. For victims located areas with public transportation options, ICMs will help them obtain a bus pass and provide an orientation to public transportation if necessary. For foreign national victims IINH has a relationship with the Manchester Transit Authority City Bus Service to provide victims with such an orientation. Transportation for certified foreign national victims will be the responsibility of the TVAP program.

24-hour response will be provided through the existing CFS 24-hour hotline. This hot-lines function on a rotating on-call system, ensuring that someone is always available. Cost to the grant will be that of OVC funded staff time when the 2 ICM’s rotations occur. All individuals that staff the lines will receive special training on human trafficking, and the project will implement a protocol for responding to victim emergencies and emergency referrals after hours, modeled after Vermont’s Rapid Response Support System (RRSS), which was designed and implemented by Project Director Erin Albright. The materials, training, and procedures used in VT’s RRSS will be adapted to NH’s unique circumstances. Several partners also have 24/7 emergency lines, and CFS will work with the Project Director and the Services Committee to connect these lines and establish a protocol for victim emergencies and after hour referrals.

Legal Services: Legal services will be provided by New Hampshire Legal Assistance
Purpose Area 1: Development of Human Trafficking Task Forces

ATTACHMENT 4: Plan for Delivery of Comprehensive Services for all Victims (NHLA). All victims will be offered a comprehensive legal screening, performed by NHLA.

This will include an explanation of rights and protections, and assistance with victim’s rights enforcement. We have allocated $5,000 per year for this service to include a 2 hour comprehensive legal screening for 30 clients, and 10 hours of follow up administrative and case tasks, at $50 per hour. NHLA will represent up to ten clients per year or matters related to housing, public benefits, domestic violence petitions, and education law at no cost to the grant. NHLA will refer clients with needs beyond those specific areas to trusted pro bono attorneys.
Purpose Area 1: Development of Human Trafficking Task Forces
Attachment 5: Plan for delivering training & accessing professional development opportunities

As part of the goals and objectives the project will conduct training and awareness activities and provide Task Force (TF) members with professional development opportunities.

**Development/Adaptation Of Training And Public Awareness Materials:** The TF has an existing Introduction to Human Trafficking ("Intro") training developed collaboratively by law enforcement and service providers that we will adapt as necessary and use to educate stakeholders and the community about human trafficking and TF activities. Topics covered include the global and local scope of the problem; laws and definitions including the definition of a victim under 22 U.S.C. § 7102(9); victim and perpetrator profiles and dynamics; risk factors and red flags; victim needs and services; and an overview of the TF. The content is suitable for all presentations delivered by the TF, whether joint presentations or targeting specific audiences. It includes both labor and sex trafficking, and uses case examples to illustrate the diversity of trafficking cases, victims, and traffickers. The TF Director will deliver this training to the full TF during our October meeting as part of an onboarding and orientation to the project.

The TF will compile a Library of additional jointly developed content that can be easily added to the Intro training to tailor it to specific audiences and/or provide more advanced level information. For example, a section on accessing public benefits might be added to a training for service providers, and a case study on labor trafficking might have additional facts related to the investigation added to it for a law enforcement audience. Through the Library as a clearinghouse, we will be able to ensure consistent messaging and quality content while simultaneously allowing for trainings to be tailored and flexible. In our experience, the more we are able to tailor the material to the audience, the greater the impact. This project will leverage the previous work of the Project Director and other members, and will be overseen by the Director and the Training and Community Engagement Committee. Both the Intro and Library will improve stakeholder
Purpose Area 1: Development of Human Trafficking Task Forces

Attachment 5: Plan for delivering training & accessing professional development opportunities to identify all forms of human trafficking, connect all victims with services, and where applicable investigate all forms of trafficking and deliver services to all victims.

The TF will use Blue Campaign and Rescue and Restore materials. We have also begun to develop a 7-10 minute “Snapshot of Human Trafficking in New Hampshire” video featuring TF members answering basic questions about the definition of trafficking, where it happens, victims and perpetrators, and how NH is responding. All filming and editing to-date has been donated, and we hope to have a final product by the fall. We will engage audiences to connect the problem to NH, and to learn how they can contact the TF for trainings, technical assistance, or to report a case. Should the need arise to develop additional materials the Training Committee will collaborate to design the materials and leverage community support to produce them.

**Target Audiences:** The results of the Baseline survey are helping us to identify specific gaps in knowledge. For example 37% of respondents indicated that they had received no training in human trafficking; 44% had received some training on recognizing sex trafficking, while only 24% had received training in recognizing labor trafficking. The survey also helps us identify specific training needs by asking respondents to identify the top three training topics that would benefit their organization, illustrated in the table below:

<table>
<thead>
<tr>
<th>Topic</th>
<th># responses</th>
<th>%</th>
<th>Topic</th>
<th># responses</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recognizing Sex Trafficking</td>
<td>320</td>
<td>77.10%</td>
<td>Laws and definitions</td>
<td>265</td>
<td>63.90%</td>
</tr>
<tr>
<td>Recognizing Labor Trafficking</td>
<td>298</td>
<td>71.80%</td>
<td>Victim and perpetrator profiles/dynamics</td>
<td>263</td>
<td>63.40%</td>
</tr>
<tr>
<td>Working with victims generally (victim experience, needs, support)</td>
<td>219</td>
<td>52.80%</td>
<td>Special considerations when working with foreign nationals</td>
<td>190</td>
<td>45.80%</td>
</tr>
<tr>
<td>Special considerations when working with minors (example: DCVF involvement)</td>
<td>210</td>
<td>50.60%</td>
<td>Special considerations when working with LGBTQ, and disabled victims</td>
<td>194</td>
<td>46.70%</td>
</tr>
<tr>
<td>Victim-Centered Approach and Trauma Informed Care for victims</td>
<td>196</td>
<td>47.20%</td>
<td>Investigating/Prosecuting a case</td>
<td>150</td>
<td>36.10%</td>
</tr>
<tr>
<td>Legal needs and services for victims</td>
<td>222</td>
<td>53.50%</td>
<td>Interviewing victims</td>
<td>173</td>
<td>41.70%</td>
</tr>
<tr>
<td>Health impact and care for victims</td>
<td>183</td>
<td>44.10%</td>
<td>Other</td>
<td>13</td>
<td>3.10%</td>
</tr>
</tbody>
</table>

Results can be analyzed by profession and geographic location, and will be used to identify target groups, individuals and organizations for training to improve the ability of the TF to
Purpose Area 1: Development of Human Trafficking Task Forces
Attachment ID #: [Redacted]
Attachment 5: Plan for delivering training & accessing professional development opportunities identify and serve all types of trafficking victims.

**Delivery:** Stakeholder trainings will occur semi-annually in 5 locations statewide such as Portsmouth, Keene, Lebanon, Berlin, and Conway. These are large cities spread throughout the state, enabling the TF to draw in diverse geographic audiences. Costs will be approximately $983 in mileage, covered by MPD, as well as project funded staff time shared by MPD and CFS. Additional stakeholder trainings may be provided upon request, at no cost to the grant except staff time. Delivery will be by Key Staff listed below, and members of the Training Committee.

**Professional Development:** First, through attending professional conferences. Sgt. [Redacted] from MPD, Erin Albright from CFS, Project Director Erin Albright, and 1 additional representative from MPD and CFS each will attend the BJA/OVC 2 day kick-off meeting. MPD and CFS will also send 2 representatives each (to be determined upon announcement of the conference time, location, and agenda) to one 4 day human trafficking training organized by DOJ or OJP. Two representatives from CFS will attend one OVC regional grantee meeting per year. Finally, two representatives from both law enforcement and service providers will also attend the annual Freedom Network Conference. This conference brings together experts in the anti-trafficking field, offering two days of workshops for professional development for both law enforcement and services, as well as TF development. Sending 2 people to each conference will maximize professional development opportunities and ensure that all key staff are informed. Whenever possible the TF will send different people to conferences to ensure as many members as possible have opportunities for such professional development. Total costs for these conferences for CFS are: $8,295 in year 1, and $4,233 in both year 2 and 3. For MPD: $8,104 in year 1, and $2664 in both years 2 and 3. See Attachment 8 for cost breakdown and description.

Second, professional development will be offered for all TF members semi-annually, during
Attachment 5: Plan for delivering training & accessing professional development opportunities
our regular monthly meeting. The first of the 6 trainings will be the Intro training described
above, which includes both laws and definitions, and identifying labor and sex trafficking. These
three topics received the highest interest for additional training in our Baseline survey.
Subsequent topics will be determined in a similar manner, based on surveys and/or informal
polling and availability of trainers capable of delivering needed topics such as trauma-informed
techniques for screening/interviewing victims and collaboration and building multidisciplinary
relationships. These trainings will be delivered by TF members with the relevant expertise.

In addition to the Freedom Network Conference, Law Enforcement will bring in local experts
for 2 of their quarterly meetings to provide professional development. For more information see
Attachment 3. We will also look to leverage existing professional development such as that
provided by the International Association of Chiefs of Police through a federal grant.

In addition to the Freedom Network Conference, Service providers will hold 2 professional
development trainings annually at the Services Committee meeting. Finally, we will leverage
opportunities available through webinars, and other federal grant-funded initiatives such as the
16 hour training for legal services delivered by Coalition to Abolish Slavery and Trafficking.

Cost and Key staff to conduct the activities described above include (CFS),
and will each dedicate 5% of her time each year to delivering trainings to stakeholders (CFS:
$3,880). Sgt will dedicated 4 hours per month to the same, for a total cost of
$3,880. The Project Director will also dedicate time to
developing/adapting materials, coordinating and delivering stakeholder trainings and
professional development. MPD and CFS will split this cost as follows: CFS year 1, 5% (3,250),
MPD 10% ($6,500); years 2 and 3: 10% ($6,500 each) for a total of: CFS - $9,750, MPD -
$13,000. See Attachment 8, Budget for additional information.
Program Evaluation and Data Collection Plan

Costs dedicated to data collection and evaluation activities:

Manchester PD and Child (MPD) and Family Services (CFS) will share the cost of data collection and evaluation. The agreed costs are: MPD will pay $15,000 per year, for 3 years, for the Evaluation Consultant. The CFS share will cover travel for the Evaluator at a cost of $1,361, and 15% of the Project Director’s time ($9,750). Data collection by Intensive case managers is part of routine case management tasks.

Proposed methods for the collection of data including a plan to use Online:

The project will collect all data outlined in the performance measures including, but not limited to: TF development and functions such as protocol development, members, and meetings; trainings activities such as content development, delivery, and audiences; investigations and prosecutions; and services for victims. The project will use the OVC Trafficking Information Management System (TIMS) and the BJA Performance Measurement Tool (PMT) as the primary mechanisms for collecting and managing data.

MPD and CFS have delegated responsibility for management and oversight of data collection to the Project Director, including ensuring quarterly reporting into TIMS and PMT. Key staff responsible for data collection are the representatives of the agencies that comprise the Core Team including: Project Director Erin Albright, the Intensive Case Managers, CFS Program Director [REDACTED], MPD Sgt. [REDACTED], the assigned MPD detective, ICE/HSI RAC AUSA [REDACTED] and Victim Witness Coordinator [REDACTED]. Actual entry of data into TIMS and PMT will be limited to Core Team members, with specific responsibilities to be determined based on efficiency and consistency considerations. For example, Intensive Case Managers will likely enter the information related to service delivery.
Purpose Area 1: Development of Human Trafficking Task Forces

Attachment ID: [REDACTED]

Attachment 6: Plan for Evaluation and Data Collection for Performance Measures
directly into TIMS, whereas information about a training and audiences might be reported to the
Project Director who will then enter it into PMT. All performance measure data will be reported
into TIMS and PMT quarterly at a minimum.

Information from non-Core Team partners will be collected and reported into TIMS and
PMT by the Project Director, using tools such as the TIMS tracking forms found in the OVC
Human Trafficking Task Force e-guide online. The Project Director will create any additional
tools necessary to facilitate data collection, including for PMT, and will be responsible for
providing training and orientation to the all TF members on data collection and use of the tools.
All data/performance metrics accrued prior to the orientation and implementation of the data
collection and tracking tools will be gathered by phone/email by the Project Director and entered
into TIMS and PMT.

At each Core Team quarterly meeting, Manchester Police Department, Child and Family
Services, The USAO, ICE/HIS, and the Project Director will discuss data collected and share
aggregate-level data that was reported through TIMS and PMT and other sources. From this
discussion, the Project Director will create one report that will be submitted to BJA and OVC as
part of the semi-annual progress reporting along with other documentation of TF work such as
meeting minutes, participation lists, and agendas. The information collected will also be shared
with the TF quarterly.

Project partners are committed to ensuring that all participants are fully informed about their
rights as to participation in the project, including data collection for evaluation, and their consent
to do so. The project will adhere to strict confidentiality policies with regard to collection and
entry of data. All participants will receive an explanation of information collected relevant to
their cases/services, and will be asked to sign an informed consent agreement to collect data, and
The evaluation consultant, qualifications, methodology and timeline:

**Evaluation Consultant**: The evaluation consultant will be Dr. [name], Associate Professor of Criminal Justice at Plymouth State University. Dr. [name] has extensive experience conducting applied evaluations recent project collaborators including the NH Courts, Juvenile Justice Agencies in Belknap County, UNH Cooperative Extension and some NH schools. Dr. [name] current project assists the NH Courts in evaluating their protocols which aim to make the courtroom environment more comfortable for children.

**Methodology and Timeline**: Dr. [name] will utilize a developmental evaluation approach (Patton, 2010) in implementing a process evaluation and analysis of the taskforce performance data throughout the grant period. A developmental approach is warranted, as this is a complex issue in a multifaceted system. Solutions and actions to overcome problems may not always be clear, and stakeholders may conflict on how to act. Dr. [name] role as the evaluator is thus as a team member, who partners with the other stakeholders to guide and facilitate learning, reflection, innovation and change.

Regular dissemination of information to TF members, in either reports and or visual displays (e.g. maps, graphs), will be the key to facilitating development of a process of continuous quality improvement and data-driven decision making. Using a utilization-focus approach (Patton, 2008), Dr. [name] will provide real-time feedback and information to the taskforce to facilitate a continuous development loop. The performance data entered into the PMT and TIMS systems by the Core Team will be analyzed by Dr. [name] or her graduate assistant quarterly and shared with taskforce members, with a written report produced annually. Additionally, the Dr. [name] will assist with data analysis for semi-annual reports and explaining any differences or discrepancies.
In addition to the performance measures, Dr. will assist the taskforce in collecting qualitative information to inform their practice beyond that provided by the performance measures. This includes developing a survey for professionals in New Hampshire who might encounter human trafficking survivors to continue to assess awareness, knowledge, perceptions of the problem in New Hampshire and training needs. The survey would be developed as a web-survey using Qualtrics and adapted from the TF Baseline survey.

Additionally, approximately 20 interviews of taskforce or key stakeholders will be conducted to assess process and implementation information not captured by the performance measures. Dr. will work with the Core Team to develop the questions for interviews. Interviews will be approximately 1 hour, with an additional hour of Dr. time spent in preparation and follow up activities. All interviews will take place via Skype or telephone to reduce time and costs related to travel. Interviews will likely occur in the 3rd and 4th quarter each year, in order to allow for enough time for the project to begin and for partners to engage in the funded work. In order to provide continued improvement, interviews will occur in all three of the project years.

All members of the Core Team will be involved with overseeing evaluation activities and the work of Dr. with primary responsibility resting with the Project Director. Using a developmental approach, the evaluation plan is emergent and developed in collaboration with others and hence subject to change. To start the evaluation process, the evaluator will orient to the issue, build relationships with task force members and key stakeholders and work to develop a learning framework with taskforce members.
Purpose Area 1: Development of Human Trafficking Task Forces

All objective and activities stem from, and are in furtherance of, the Task Force’s **goal** of continuing to develop and enhance the multidisciplinary human trafficking response in NH in a way that implements victim-centered, collaborative, and sustainable approaches to: a) Identify victims of all forms of trafficking; b) Investigate & prosecute sex and labor cases at local, state, federal level; and c) Address individualized service needs of victims through delivery of a comprehensive array of services.

<table>
<thead>
<tr>
<th>Abbreviation Key</th>
</tr>
</thead>
<tbody>
<tr>
<td>MPD: Manchester Police Department</td>
</tr>
<tr>
<td>CFS: Child and Family Services</td>
</tr>
<tr>
<td>USAO: United States’ Attorney’s Office</td>
</tr>
<tr>
<td>HSI: Homeland Security Investigations</td>
</tr>
<tr>
<td>LEC: Law Enforcement Committee</td>
</tr>
<tr>
<td>VSC: Victim Services Committee</td>
</tr>
<tr>
<td>TCE: Training &amp; Community Engagement Committee</td>
</tr>
<tr>
<td>Director: Project Director</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Activity</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>OBJ. 1: Establish and sustain effective leadership and structure that will engage necessary resources to support the 3 goals.</strong></td>
</tr>
<tr>
<td>Finalize partner MOU</td>
</tr>
<tr>
<td>Finalize membership MOU</td>
</tr>
<tr>
<td>Core Team Meetings (quarterly)</td>
</tr>
<tr>
<td>Protocol Development</td>
</tr>
<tr>
<td>Protocol review, finalizing, and updating</td>
</tr>
<tr>
<td>Convene Full Task Force Meetings</td>
</tr>
<tr>
<td>Law Enforcement Committee quarterly meetings</td>
</tr>
<tr>
<td>Victim Services Committee quarterly meetings</td>
</tr>
<tr>
<td>Training and Community Engagement Committee meetings</td>
</tr>
<tr>
<td>Project Group meetings</td>
</tr>
</tbody>
</table>

Page 1 of 5
<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recruit new members based on identified gaps and state-wide capacity building</td>
<td>Core Team</td>
<td>Ongoing as necessary</td>
<td>Ongoing as necessary</td>
<td>Ongoing as necessary</td>
</tr>
<tr>
<td>OBJ. 2: Make data-driven decisions based on shared understanding of the prevalence, scope, and nature of trafficking within geographic area</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop data collection and tracking tools</td>
<td>Director &amp; Evaluator</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide training/orientation to all project partners on performance measures and data collection tools</td>
<td>Director, Core Team</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Collect performance measure data using tools developed¹</td>
<td>All</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Collect performance measure data from project partners and enter in TIMS</td>
<td>Director</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Collect performance measure data from project partners and enter in PMT</td>
<td>Director</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Share data with TF members</td>
<td>Director, Evaluator</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Compile and Submit semi-annual report through GMS including identical aggregate data reports from TIMS and PMT</td>
<td>Director, Evaluator</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Finalize MOU with Plymouth State University for Program Evaluation</td>
<td>Core Team</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop evaluation questionnaire</td>
<td>Evaluator &amp; Core Team</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Evaluator analysis of performance metrics</td>
<td>Evaluator</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Evaluator interviews with stakeholders</td>
<td>Evaluator, stakeholders</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Evaluator interim and final reports (required) plus annual report (per proposal)</td>
<td>Evaluator</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Activity</td>
<td>Responsibility</td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>----</td>
<td>----</td>
<td>----</td>
</tr>
<tr>
<td>Attend DOJ/OJP 4 day trafficking training</td>
<td>2 LEA, 2 VSP – to be determined</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attend 2 day OVC grantees meeting</td>
<td>2 CFS staff, TBD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attend DOJ kickoff meeting</td>
<td>Director, MPD Sgt. Thompson, CFS Erin Kelly + 1 additional MPD and CFS staff</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attend Freedom Network professional development conference</td>
<td>2 LEA, 2 VSP to be determined</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adapt and finalize basic training for general audiences</td>
<td>Director + Training Committee</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Tailor basic training for priority professional audiences</td>
<td>Director + Training Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct introductory training/project orientation for project partners</td>
<td>Director</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Conduct semi-annual professional development training for project</td>
<td>TBD from TF members, stakeholders</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct professional development for law enforcement</td>
<td>TBD</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct professional development for service providers</td>
<td>TBD</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Conduct training for relevant stakeholders</td>
<td>Director, CFS MPD, Training Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

OBJ. 3: Identify victims of all types of trafficking through coordinated training, public awareness and outreach, and trauma-informed screening and interview techniques.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
</tr>
<tr>
<td>Compile a training library to be shared by project partners</td>
<td>Training Committee, Director</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Conduct and/or participate in public awareness activities</td>
<td>All members</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>OBJ 4:</strong> Conduct proactive investigations of sex and labor trafficking with goal of successful prosecution of cases at state or federal level</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Threat Assessment</td>
<td>Law Enforcement Committee</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Law Enforcement Committee meetings</td>
<td>MPD, HSI, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Law Enforcement professional development</td>
<td>TBD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proactive Investigations</td>
<td>All law enforcement partners</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Work with Police Standards and Training to incorporate trafficking into academy</td>
<td>MPD, HSI, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Outreach to labor investigators</td>
<td>MPD, Law Enforcement Committee, DOL</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Outreach to new police departments</td>
<td>MPD, Law Enforcement Committee</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td><strong>OBJ 5:</strong> Ensure a comprehensive array of services are readily available to meet individualized needs of all victims</td>
<td></td>
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</tr>
<tr>
<td>Hire Intensive Case Managers</td>
<td>CFS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Provide Intensive case management and comprehensive services delivery</td>
<td>CFS, Intensive Case Managers</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finalize CCR partner MOUs</td>
<td>Director</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
Purpose Area 1: Development of Human Trafficking Task Forces

Compition ID #: XXXX

ATTACHMENT 7: Project Timeline

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>YEAR 1</th>
<th>YEAR 2</th>
<th>YEAR 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expand CCR statewide</td>
<td>Services Committee, Director</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q1</td>
<td>Q2</td>
<td>Q3</td>
</tr>
</tbody>
</table>

1 The Director will gather by phone and/or email all data/performance metrics accrued prior to the orientation and implementation of the data collection and tracking tools and enter into TIMS and PMT.
BAR ADMISSION
Massachusetts Bar November 2010 - Present

EXPERIENCE.
Give Way to Freedom Regional Program Director Boston, MA October 2013 - Present
- Provide support and technical assistance to Task Forces and other stakeholders for the development of multidisciplinary, collaborative partnerships and protocols
- Develop and implement, in collaboration with United States Attorney's Office (VT) and Vermont Human Trafficking Task Force, Rapid Response program enabling law enforcement to connect victims of human trafficking with trained service providers as soon as possible after identification
- Build capacity for legal and social services for victims of trafficking in New England and downstate New York through identification of partners, coordination of training, and case oversight
- Provide technical assistance on policy related to human trafficking including criminal statutes, victims compensation statutes and regulations, and licensing regulations

International Institute of New England Anti-Trafficking in Persons Regional Service Coordinator Boston, MA October 2011 - Present
- Establish and manage regional network of victim services agencies to provide victim centered, trauma informed comprehensive case management to victims of human trafficking
- Deliver comprehensive case management to victims of human trafficking including strengths-based individualized service planning and case coordination with law enforcement and attorneys
- Provide tailored training and technical assistance to victim services providers, law enforcement, and attorneys on cultural competency and working with foreign national victims of trafficking

Massachusetts Task Force to Combat Human Trafficking Data and Outreach Specialist Boston, MA October 2009 - October 2011
Legal Intern June 2009 – October 2009
- Designed, implemented, and managed case data tracking system to compliment federal reporting requirements and provide reports for BPD leadership
- Performed in depth review and analysis of state, national, and international legislation on human trafficking and drafted new legislation to incorporate best practices and emerging issues
- Researched and created presentations and training materials for variety of audiences on topics including federal and state laws, best practices in combating labor trafficking for Harvard Carr Center sponsored webinar, and country specific information for international audience

Massachusetts Superior Court Judicial Fellow (Clerk) Boston, MA September 2010 - October 2011
- Prepared draft decisions and legal memoranda for civil and criminal cases
- Worked extensively with Justices on trials, hearings and motion sessions

Boston College Immigration and Asylum Project Legal Intern Boston, MA January 2009 – May 2009
- Represented client on successful motion to reopen application for asylum case
- Participated in Know Your Rights presentations at local detention centers, conducting interviews and providing advice on individual cases

2018-ICLI-00046 250
PROFESSIONAL ORGANIZATIONS and LEADERSHIP EXPERIENCE

Freedom Network
- Member of Steering Committee
- Co-chair of Policy Committee
December 2014 - Present

New Hampshire Commission to Combat Human Trafficking (now Task Force)
- Chair of Task Force
- Member of Executive Committee
- Member of Training and Community Partnership Committee
June 2015 - Present

Vermont Human Trafficking Task Force
- Technical Advisor to the Task Force
December 2011 - Present

Boston Bar Association, Delivery of Legal Services Committee
- Member of Steering Committee
- Co-chair of Human Trafficking Sub-Committee
September 2013 - May 2015

SELECT PRESENTATIONS

U.S. Department of Labor, Wage & Hour Division (New England)
- Identifying and Investigating Labor Trafficking
December 2015

New England Council on Crime & Delinquency Annual Conference
- Trauma & its Relevance in Cases of Human Trafficking
October 2015

Freedom Network Annual Conference
- Human Trafficking Task Force Troubleshooting
April 2015

Preble Street Anti-Trafficking Coalition, ME
- Collaboration & Protocol Development for Multi-Disciplinary Teams
September, 2014

New Hampshire Advisory Panel to US Commission on Civil Rights
- Testimony on status of anti-trafficking efforts in New Hampshire
June 2014, September 2013

Maine Advisory Panel to US Commission on Civil Rights
- Testimony on enhancing capacity to combat labor trafficking
June 2014, May 2012

Los Angeles Police Department, West Valley Division
- Training on building victim-centered investigations
October 2013

Vermont Rapid Response Support System Stakeholder Training
- Confidentiality & Information Sharing in Human Trafficking Cases: Special Considerations for Advocates in a Multi-Disciplinary Setting
August 2013

New Hampshire Twentieth Annual Child Abuse and Neglect Conference
- Service Provider Response to Human Trafficking: Identifying Victims & Establishing Key Partnerships
October 2012

Not for Sale: 2012 Annual Tri-State Advanced Victim Assistance Conference, VT
- Anti-Trafficking Legislation and Protocol Development: A New England Regional Comparison
September 2012

SELECT PUBLICATION

Human Trafficking: Guidebook on Identification, Assessment, and Response in the Healthcare Setting, co-authored with W. Massachusetts Medical Society Committee on Violence Intervention and Prevention
September 2014

EDUCATION

Boston College Law School, Newton, MA
Juris Doctor, May 2010
August 2007 - May 2010

University of Mary Washington, Fredericksburg, VA
Bachelor of Arts, cum laude, in International Affairs, May 2005
August 2000 - May 2005
EDUCATION
Union Institute and University - Vermont College, Brattleboro, Vermont
2004-2006 Master of Arts, Psychology and Counseling
Gordon College - Wenham, Massachusetts
1997-2001 Bachelor of Arts, Psychology
1997-2001 Bachelor of Arts, Youth Ministry

LICENSE
Board of Mental Health Practice State of New Hampshire. Licensed Clinical Mental Health Counselor, License # 722

PROFESSIONAL APPOINTMENTS/MEMBERSHIPS
- 2013-Present New Hampshire Attorney General's Commission on Human Trafficking and Sexual Exploitation – representative of youth services
- 2010-Present New Hampshire Balance of State Continuum of Care
- 2008-Present New Hampshire Homeless Teen Task Force
- 2008-Present Manchester Continuum of Care
- 2011-2013 New Hampshire State Suicide Prevention Council – Governor appointed representative of youth services
- 2012 United States Family and Youth Services Bureau Focus Group on Runaway and Homeless Youth Program Outcomes – Regional representative
- 2010-2012 New Hampshire HIV and STD Division Community Planning Group – representative of youth services
- 2006-2011 New Hampshire Alcohol, Tobacco, and other Drug Service Providers Association – representative of youth prevention services

PROFESSIONAL EXPERIENCE
January 2014-Present
Program Director – Child and Family Service of New Hampshire, Manchester, NH
- Direct the operations of the continuum of programs serving runaway and homeless youth including Basic Center Programs, Street Outreach Programs, Drop-in Services, Transitional Living Programs, and Maternity Group Home Programs.
- Provide all administrative and clinical supervision for Program Manager.
- Provide oversight for a staff of 16.
- Develop and implement strategic plan for all programs including facilitating staff participation, presenting to agency operations team, incorporating feedback, and identifying and bringing to fruition prioritized goals
- Oversee local, state, and federal grant applications, reporting and contracts
- Develop and manage program budgets
- Provide program evaluation and outcome data
February 2010–January 2014
Program Manager - Child and Family Services of New Hampshire, Manchester, NH

- Manage the day-to-day operations of programs serving runaway and homeless youth including 2 Basic Center Programs, 2 Street Outreach Programs, and a drop-in facility.
- Provide all administrative and clinical supervision for staff of ten.
- Develop and implement strategic plan for all programs including facilitating staff participation, presenting to agency operations team, incorporating feedback, and identifying and bringing to fruition prioritized goals.
- Facilitate the professional growth of staff by providing guidance around goal development and relevant learning opportunities.
- Oversee local, state, and federal grant applications, reporting and contracts.
- Develop and manage program budgets.
- Provide program evaluation and outcome data.

November 2008–February 2010
Runaway and Homeless Youth Program & Student Assistance Program Supervisor - Child and Family Services of NH, Manchester, NH

- Supervised the day-to-day operations of a substance use prevention program in four high schools.
- Provided administrative and clinical supervision for staff of four.
- Established and maintained relationships with community organizations, key partners, and school department administration.
- Completed proposals and reports for all federal grants and state contracts.
- Provided evaluation from an evidence-based intervention perspective.

July 2006–November 2008
Home-Based Family Therapist - Child & Family Services of NH, Manchester, NH

- Provided court-ordered family counseling services and case management to families involved with the juvenile justice system or child protective services.
- Advocated for youth and families in the educational system, court setting, and within community services.
- Provided referrals for relevant community services when appropriate.
- Developed and implemented client-centered treatment plans to address youth and family functioning and maintained on-going documentation to measure progress.

September 2005 – May 2006
Masters Level Counseling Intern – New England College Counseling Center, Henniker, NH

- Provided individual office-based counseling services to New England College students with an average caseload of ten.
- Provided psycho-educational groups for students who committed a substance use offense on campus.
- Developed and taught semester long elective class focused on health and wellness – composing course description and syllabus, and instructing 15 students.

August 2005–July 2006
Residential Counselor - Wediko Children’s Services, Windsor, NH

Recent trainings & certifications, transcripts, job reviews, and references available upon request.
PROFESSIONAL EXPERIENCE
Child and Family Services - Manchester, New Hampshire (2013 to present)
Senior Vice President, Chief Operating Officer
• Work with management team to ensure acceptable standards of professional practice & responsiveness to community needs. • Support and consult with team in employees matters.
• Participate in preparation of the annual budget, ensure agency programs are administered within budget and maintain proper fund accounting. • Participate in developing and coordinating sound community programs. • Participate in community collaborations.

FIRST – Manchester, New Hampshire (2011 to 2013)
Director, Corporate & Foundation Relationships
• Managed team of 8 to develop and cultivate relationships to raise $16 million annually. Responsible for staff hiring, training and supervision. • Maintain and grow existing donor accounts by providing strategic vision, leadership, and direction. • Create annual business plan, maintain donor database.

CHILD ADVOCACY CENTER – Hillsborough County, New Hampshire (2010 to 2011)
Executive Director
• Provide strategic leadership & management. Supervise 4 staff. Report directly to the board of directors. • Met standards for accreditation through the National Children’s Alliance. • Create annual work plan & budget. Manage funding to support operations. • Spokesperson.

NEW FUTURES – Exeter, New Hampshire (2005 to 2009),
Director, Adolescent Treatment Initiative and Closing the Treatment Gap Initiative
• Implement evidence based treatment in 5 NH communities and expanded use of evidence based practice. • Provided training on the use of evidence based treatment approaches.

RECLAIMING FUTURES – Concord, New Hampshire (2002 to 2005), State Director
• Secured $1.3 million from the Robert Wood Johnson Foundation. • Responsible for hiring, supervising and evaluating work of 6 staff. • Facilitated 5 year strategic planning process with state level advisory board. • Institutionalized screening and assessment protocol in juvenile court system. Screen for risk and protective factors. Expanded juvenile drug courts from 2 sites to 7.

ADDITIONAL PROFESSIONAL EXPERIENCE
Director of Operations and Program Development/Clinical Social Worker
RIVIER COLLEGE – Nashua, New Hampshire (2009 to 2011)
Adjunct Faculty, Communications Department, Grant Writing Skills

EDUCATION
Master’s Degree in Social Work (MSW), University of New Hampshire, 1998
Bachelor’s Degree in Social Work (BSW), Rivier College, 1991
PROFESSIONAL EXPERIENCE

Resident Agent in Charge (GS-1811-14); February 2014 to Present
ICE, Homeland Security Investigations, Manchester, NH
Supervisor: ASAC

- Responsible for overseeing eight Criminal Investigators, one Intelligence Research Specialist, and one Mission Support Specialist
- Lead investigations in accordance with Homeland Security Investigations priorities, to include Child Exploitation, Narcotics, and Human Trafficking
- Area of Responsibility includes the entire State of New Hampshire

Supervisory Special Agent (Group Supervisor) (GS-1811-14); September 2010 to February 2014
ICE, Homeland Security Investigations, Boston, MA
Supervisor: ASAC

- Utilize my knowledge of immigration and customs laws and regulations, as well as investigative techniques to lead the Gangs and Customs Fraud Group consisting of ten Special Agents, one Intelligence Research Specialist, and an Investigative Assistance.
- Ensure performance and results by conveying clear and attainable expectations to group members. Counsel and develop improvement plans that involve training and teamwork building exercises when expectations are not being met.
- Responsible for a variety of decision making and problem solving activities daily. Examples include prioritizing investigative leads, determining whether to initiate of removal proceedings on potential violators as well as bond determinations, and resolving interpersonal conflict within the group. External partners, such as the United States Attorney’s Office, and other law enforcement agencies, are conferred, as appropriate.
- Temporarily promoted to GS-15 for six months as Assistant Special Agent in Charge (ASAC) from August 2012 through January 2013. Provided oversight to the Hartford CT, New Haven CT, and Springfield MA Resident Agents in Charge, as well as HSI Gang and Customs Fraud Group.
- Acted as ASAC for a three week time period at the time of the Boston Marathon Bombing (04/15/2013) and for three weeks subsequent to the event. During this time, I led the immediate and long-term HSI Boston response in a variety of ways to include response funding, scheduling, and reporting.

Supervisory Special Agent (Section Chief) (GS-1811-14); March 2009 to September 2010
ICE, Homeland Security Investigations, Compliance Enforcement Unit (Headquarters), Washington, DC
Supervisor: ASAC

- Led a team of over 40 contract analysts, three National Program Managers, and four Criminal Research Specialists.
- Managed a $10,000,000 Student and Exchange Visitor Enforcement Program Budget. This budget served to cover analyst contracts, and major case funding. Responsible for allocating, and distributing funding as appropriate.
- Temporarily promoted to GS-15 for 90 days to serve as the Compliance Enforcement Unit Chief. Developed and implemented plans to modernize the CEU by realigning its mission to current threat reporting, and to enable the unit to address complex criminal violations involving benefit fraud, and exploitations of the Student and Exchange Visitor Program. These efforts resulted in the current structure of the Counterterrorism and Criminal Exploitation Unit (CTCEU).
National Program Manager (GS-1811-14); January 2007 to March 2009
ICE, Homeland Security Investigations, Compliance Enforcement Unit (Headquarters), Washington, DC
Supervisor: [Redacted] (202) 573-2704
- Served as Subject Matter Expert for criminal investigations relating to criminal abuse of the Student and
  Exchange Visitor Program
- Served as Subject Matter Expert for a ABC Nightly News story concerning vulnerabilities within the
  nation’s Alien Flight Student Program
- Managed and directed national security cases for field office investigation

Special Agent (GS-1811-5, 7, 9, 11, 12, 13); August 2001 to January 2007
Immigration and Customs Enforcement, Office of the Special Agent in Charge, San Francisco, CA
Supervisor: Group Supervisor [Redacted] (415) 716-1060
- Initiated, conducted and directed investigations of complex immigration fraud schemes involving
  facilitators, including undercover operations. Directed a team of investigators in activities such as
  surveillance, search warrants, and other enforcement operations in order to ensure the success of the
  investigation.
- Coordinated with and assisted the United States Attorney with prosecution of criminal offenders.
- Recruited and developed cooperating sources of information and witnesses to support criminal
  investigations.

Immigration Agent (GS-1801-5, 7, 9); September 1997 to August 2001
United States Immigration and Naturalization Service, San Francisco District Office
Supervisor: [Redacted] (415) 716-1060
- Responsible for identifying and interviewing felon inmates of California’s San Quentin State Prison who
  were amenable to deportation and preparing removal proceedings and/or criminal prosecution.
- Worked with state and local Violent Gang Task Forces to identify, apprehend, remove, and prosecute
  immigration violators.

EDUCATION

Golden Gate University School of Law, San Francisco California
Doctorate of Jurisprudence; December 2003
- Attended the Evening Program while working professionally with INS and ICE over 50 hours per week
- Dean’s List Student

Saint Anselm College, Manchester New Hampshire
Bachelor of Arts, Liberal Arts; May 1997
Dean’s List Student

HONORS, AWARDS & SPECIAL ACCOMPLISHMENTS

- Massachusetts Bar Association since December 2004
- ICE Assistant Secretary’s, Protecting the Homeland Award, SEVP School Fraud Initiative, August 2008
EDUCATION

Duke University School of Law, Durham, NC
Juris Doctor, cum laude, May 2008
GPA: 3.7/4.0
Honors:  - Duke Law Journal, Staff Editor
         - Jurisprudence Award, Criminal Law (highest grade)

Brandeis University, Waltham, MA
Bachelor of Arts in History, magna cum laude, May 2005
Minor in Spanish Language
GPA: 3.97/4.0
Honors:  - Phi Beta Kappa, Brandeis University Mu Chapter
         - Phi Alpha Theta International Honor Society for History, Brandeis Alpha Epsilon Omicron Chapter

EXPERIENCE

United States Attorney's Office, Concord, NH  Dec. 2012 - Present
Assistant United States Attorney - Criminal Division
Project Safe Childhood (PSC) and Sex Trafficking Coordinator
- Prosecute all federal crimes occurring in the District of New Hampshire
- As PSC and Sex Trafficking Coordinator, serve as the USAO point of contact for all child exploitation and sex trafficking investigations and criminal prosecutions
- Primary caseload consists of child exploitation and human trafficking crimes

Law Clerk to the Honorable Jeffrey R. Howard
- Analyzed briefs, prepared briefs, memoranda, and discussed critical issues with Judge Howard in anticipation of oral arguments
- Attended oral arguments and convened with Judge Howard to consider potential outcomes and propose possible avenues of analysis
- Prepared preliminary draft opinions, involving primarily issues of criminal law
- Reviewed and edited drafts of opinions submitted by other First Circuit Judges

Ropes & Gray LLP, Boston, MA  Aug. 2008 - Aug. 2011
Associate, Litigation Department (Government Enforcement Group)
- Represented companies under investigation by the U.S. Attorney's Office, SEC, and Congress, as well as other federal and state authorities
- Participated in all aspects of investigation defense, including document collection and review, preparing for and conducting witness interviews, and preparing memoranda assessing client risks
- Supervised teams of junior associates in conducting multiple internal investigations
- Researched and drafted extensive legal memoranda on various issues, including corporate direct and officer liability, and compliance of medical technology clients with the Federal Food, Drug and Cosmetic Act and the Federal Anti-Kickback statute

BAR MEMBERSHIPS

Commonwealth of Massachusetts, 2008
Education:
Lowell High School 1988-1992
BS Business Management Granite State College 2004-2008

Work Experience:
Honorable Discharge

Manchester Police Department 1990-present
Patrol Officer 1999-2008
Street Crime Unit 2008-2009
Patrol Sergeant 2009-2013
Detective Sergeant 2013-2016

Specialized Training:
Basic Drug Investigations, Field Training Officer, Identity Fraud Investigations, Crime Scene Investigations, Officer Related Shootings Investigations, FEMA Courses, Pawn Shop Investigations, NAMI Suicide Prevention Instructor, Human Trafficking Investigations, and Sexual Assault Investigations

Related and Additional Experience:
Chairman of the Greater Manchester Council Against Domestic and Sexual Violence
Chairman of the Hillsborough County North Sexual Assault Resource Team
Member of the Human Trafficking Working Group
Member of the Attorney General's Human Trafficking Committee
Member of the Attorney General's Domestic and Sexual Violence Protocol Committee
Member of the State Automated Victim Notification Committee
Member of the American Victim Assistance Program Board Partnership
Detective Sergeant of the Manchester Police Domestic and Sexual Violence
over 8,000 domestic violence cases supervised
over 1,000 sexual assault cases investigated or supervised
over 10 human trafficking cases investigated or supervised
CURRICULUM VITAE

Associate Professor, Department of Criminal Justice
Plymouth State University
Plymouth, NH

135 Fairgrounds Road
Plymouth, NH 03264

Office Phone: 603.535.7247
Home: 603.996.0520
Email: [REDACTED]

EDUCATION

Ph.D., 2008, University of New Hampshire, Sociology with concentrations in Criminology and the Family

Master of Arts, 2004, University of New Hampshire, Sociology

Bachelor of Arts, 2002, Plymouth State University, Sociology

TEACHING EXPERIENCE

Associate Professor, 2006-Present, Department of Criminal Justice, Plymouth State Present University, Plymouth, NH

Teaching and Research Assistant, 2002-2006, Department of Sociology, University of New Hampshire, Durham, NH

CONSULTING


Co-Evaluator, Suicide Prevention Initiative, SAMSHA Grant, Plymouth State University, Fall 2012 - Spring 2015.
Research Consultant, Domestic Violence Fatality Review Committee, Bi-Annual Data Report, Data analysis, Created Charts, Tables, Maps and applied report writing, Spring 2014.


Co-Investigator, University of New Hampshire Cooperative Extension, Durham, NH. Evaluation research and internal capacity building for USDA Children Youth and Families At-Risk (CYFAR) funded youth development programs in Hillsboro, Seabrook, Haverhill and Boscawen Schools, 2002-2009.

PROFESSIONAL DEVELOPMENT ACTIVITIES

Bureau of Justice Statistics Program Scholar, 2005, Inter-University Consortium for Political and Social Science Research (ICPSR), University of Michigan, Enrolled in the following classes: Quantitative Analysis of Crime and Criminal Justice Data, Maximum Likelihood Estimation and Matrix Algebra.

TEACHING AREAS/INTERESTS

Research Methods for Social Sciences; Applied Statistics; Victimology; Women and Crime; Juvenile Delinquency; Family Violence; Crime prevention; Criminology; Supervising student empirical research projects and service learning projects.

RESEARCH AREAS/INTERESTS

Applied research and evaluation; the intersection of juvenile victimization and offending; Child maltreatment; Minor Sex Trafficking; Sexual offender policy; Crime and Analogous Behaviors on College Campuses, Teaching excellence.

REFEREED PUBLICATIONS


**NON-REFEREED PUBLICATIONS**

**Book Chapters**


**Technical Reports, Research and Evaluation**


(2011). *Suggestions for the NH Court Improvement Project's Performance Measures Presentation, NH Administrative Office of the Courts, Court Improvement Project.*


REFEREED PRESENTATIONS


(2009, November 6) Gaining access to law enforcement agencies and records: Trials and tribulations from the field. The American Society of Criminology Annual Meeting, Philadelphia, PA.

(2009, March, 13). The police response to juveniles’ involvement in prostitution: Findings from 6 metropolitan agencies in the U.S. Academy of Criminal Justice Science’s annual meeting, Boston, MA.


(2008, July 29). Law enforcement’s conceptualization of juvenile
PROFESSIONAL ASSOCIATION MEMBERSHIP AND PARTICIPATION

American Evaluation Association, member 2012-present

Academy of Criminal Justice Sciences, member 2009-2010

American Society of Criminology, member 2007-present

OTHER PROFESSIONAL ACTIVITY/SERVICE

Board member, Grafton County Mental Health Court, 2013-2015.

Journal Article Reviewer, Child Maltreatment, 2009 - present

Journal Article Reviewer, Child Abuse and Neglect, 2010 - present


Board member, Whole Village Family Resource Center, Plymouth, NH, Fall 2009 - Spring 2011

Mentor, Circle Program, Plymouth, NH, Fall 2007 - Fall 2009

Vice President, Board of Directors: Orion Prevention Information and Education (OPIE), Newport, NH, 2003-2005

Guardian ad Litem/Child Advocate: Court Appointed Special Advocate (CASA) of New Hampshire, Plymouth, NH, 1999-2002

SERVICE ACTIVITIES

Criminal Justice Department Service

Chair, CJ Department, Plymouth State University, Spring 2015 – present

Advisor, Criminal Justice Honor Society, Fall 2007 – Present

Search Committee CJ Department, Plymouth State Fall 2013, 2014

Search Committee CJ Department, Chair, Plymouth State, 2012, 2015
NEW HAMPSHIRE HUMAN TRAFFICKING TASK FORCE
PROJECT DIRECTOR
JOB DESCRIPTION

The role of the Project Director is to guide overall efforts in furtherance of the Task Force goal and objectives.

Approximate Time Commitments:
• 35% time dedicated to Task Force management and development including: planning and convening meetings; formalizing MOUs; outreach to engage new members, working with Committees
• 20% time dedicated to development and delivery of training
• 15% time dedicated to protocol development
• 15% collecting and analyzing data, evaluation, working with evaluator
• 15% time dedicated to building the CCR through outreach and supporting service providers through technical assistance

Responsibilities include:
• Provide overall project management and leadership
• Convene monthly meetings including agenda preparation
• Formalize all MOUs
• Guide the development and update of the Task Force protocols
• Assist with the development of the Coordinated Community Response for an effective and customized response to victims of trafficking.
• Oversee the collection, sharing, and reporting of performance measurement data including data entry into TIMS and PMT as appropriate
• Compile and submit required semiannual GMS reports
• Oversee evaluation activities and the work of the Evaluation Consultant.
• Assist with the collection of data and analysis for the process of evaluation.
• Co-facilitate the Community Engagement and Training Committee
• Develop tailored materials for the Training Library
• Deliver stakeholder trainings
• Organize Task Force professional development trainings
• Deliver Task Force professional development training on topics such as confidentiality, immigration benefits for victims, collaboration and multidisciplinary team building, labor trafficking, and others
• Provide management support to other Committees as necessary
• Conduct outreach to expand task force membership
Child and Family Services

POSITION: Case Manager

LOCATION: Manchester/Dover

PROGRAM: RYP

SUPERVISOR: Program Manager

RESPONSIBILITIES/SUMMARY:
The Case Manager will provide intensive case management services to victims of all forms of human trafficking. These victims are likely to represent diverse backgrounds and may include foreign nationals, US citizens, adults, minors, and LGBTQ individuals. Case Manager will work within a coordinated, community-wide system of care to ensure that these victims are connected to the services they need. The work of the Case Manager ensures the provision of wraparound services that meet victims where they are and helps to express their choices while working through the trauma of the situation and interacting with the necessary local and federal partners.

FUNCTIONS/DUTIES:
Essential functions of this position include but are not limited to the following:

- Serve as the primary case manager for individuals who have experienced human trafficking. Be the point of contact connecting victims to law enforcement, legal assistance, child welfare, domestic violence services, housing, medical and behavioral health treatment, educational and vocational support, immigrant and refugee services, translation and interpretation services and other services as necessary.
- Complete assessment of the victim’s needs and develop an individualized service plan tailored to meet these needs.
- Utilize a victim centered and trauma informed approach.
- Communicate with community service providers as appropriate for coordination.
- Build trusting relationships with individuals who access other CFS programs or are referred from other organizations and are suspected to be victims of trafficking.
- Participate in outreach efforts in the community to educate and raise awareness of human trafficking and the services available.
- Be proficient in the implementation of low-barrier, strength-based, victim centered, and trauma-informed case management.
- Assist with the development of program procedures, policies and protocols.
- Complete client documentation and maintain paper and electronic files as requested.
- Assist with activities of the Human Trafficking Workgroup as assigned.
- Participate in agency-wide emergency on-call system.
QUALIFICATIONS:
Bachelor's Degree in Social Work, Psychology, Sociology, Criminal Justice or related field with at least three years of experience working with vulnerable populations. Experience using a victim centered, trauma informed approach to work with individuals. A thorough knowledge of community resources and demonstrated success in working collaboratively with community-based service providers. Must possess excellent oral and written communication skills, and be able to solve problems independently. Must have good driving record, reliable transportation and liability insurance coverage. Must be available to work a flexible schedule to include some nights and weekends. Bilingual candidates encouraged to apply.

PHYSICAL/MENTAL REQUIREMENTS:
40-hour position working flexible hours. Must be able to travel to community sites including schools, client homes, client work places, service providers, courts, police departments and other community locations. Must be available to work a flexible schedule, meeting the needs of clients seeking services.

EQUIPMENT/TOOLS UTILIZED:
General office equipment, software packages and security cameras. Reliable transportation and acceptable motor vehicle record. Auto insurance at or above the agency's required liability coverage.
Manchester Police Department
Human Trafficking Investigator/Detective
Position Description/Requirements

Manchester Police Department will assign a Detective with at least 1 year of experience investigating human trafficking and related crimes, and a minimum of 5 years experience in areas such as gang and drug investigations, and/or domestic violence and sexual assault investigations. In addition they will have demonstrated experience and training working with victims of crime including violent crime, employing trauma-informed techniques when working with and interviewing victims, and be well versed in cultivating and maintaining diverse sources of intelligence including but not limited to street and workplace informants.

The assigned Detective will be responsible for proactive investigations of both sex and labor trafficking statewide, will participate on the Law Enforcement Committee, and will provide support and technical assistance for investigations as necessary.
From: [Redacted]  
Sent: Monday, June 12, 2017 4:42 PM  
To: [Redacted]  
Subject: 90-120 Days Initiative - Target TCO Border Smuggling of Unaccompanied Minors  

Importance: High  
Follow Up Flag: Flag for follow up  
Flag Status: Flagged  

All,  


Effective 06/13/2017 and for the next 90-120 days, HQ has established a New Initiative - Target TCO Border Smuggling of Unaccompanied Minors. HQ tasked HSI to develop a Response Team to respond to unaccompanied minors smuggled through the border.  

Per Acting SAC [Redacted] Acting DSAC [Redacted] and ERO, the members of the Response Team are: SSA [Redacted] SSA [Redacted] SSA [Redacted] SSA [Redacted] and the ERO Duty Officer. The tasking with be accomplished in three phases and must be accomplished within 72 hours:  

Phase 1 – When CBP encounters the smuggled unaccompanied minor(s), CBP will contact HSI for processing. HSI agents will pass on the I-213 Report of Deportable Alien information to the SIP for further analysis. *The role of the SIP is to determine the final destination(s) of the minor(s), determine the parents/guardians of the minor, and develop target folders of the parents and/or guardians. If it is determined that the final destination and/or location of the parents are outside the AOR, the HSI office can send out collaterals to accomplish phase 2 and phase 3.  

Phase 2 – HSI Agents will conduct “knock and talks” and determine the identifies of the parents/guardians.  

Phase 3 – HSI Agents will conduct interviews of parents/guardians. If determined that the parents/guardians did pay smugglers to smuggle their children through the border, then HSI agents will develop warrants of prosecution.  

The new initiative is fluid and updates will be forthcoming.  

Thanks.  

[Redacted]  

[Redacted]  

Intelligence Research Specialist  
Homeland Security Investigations  
SAC Intelligence Program (SIP) Honolulu  
desk: 808-237- [Redacted]  
cell: 808-864- [Redacted]  
email: [Redacted]
WARNING: This document is FOR OFFICIAL USE ONLY (FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). This document is to be controlled, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to Sensitive But Unclassified (SBU) information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval from the originator. If you are not the intended recipient, please contact the originator for disposition instructions.
Hi,

Currently, there is an unaccompanied minor (UM) initiative coming from HQ.
For our (Intell) part, we will have to create target packages (checks) for any sponsors that fall within our AOR for the UM’s that are encountered at the border during this initiative. This is a priority. So if get anything, it will be routed to me and then I’ll send it to one of you to work on ASAP. It will probably be just an I-213.

Attached is ERO’s list of FAMU docket in Hawaii. This is just FYI, but we may want to look into this and write up something on it. [Redacted] is the POC for this initiative and he said that the focus should be on the current ones making entry.

Can you check and see if we can get the local addresses and point of entries for the individuals on the attached list?

Let me know if you have any other questions.

Thanks,

[Redacted]

Acting Chief Intelligence Officer
HSI SAC Intelligence Program Honolulu
Phone: 808-590-[Redacted]
HSDN email: [Redacted]

The attached report on the HHW FAMU cases should provide a good starting point to assess possible targets for the ongoing UAC operation. The report includes both unaccompanied minors and family groups that are on the FAMU docket. You will find that the bulk of the juvenile cases in Hawaii reside on either the Big Island or Maui. Also note that the sponsor/family members usually accompany the juveniles to their scheduled hearings on Honolulu. As such, I’d recommend focusing on recent entrants whose cases are still pending before EOIR.

Feel free to reach out if ERO can provide any assistance.
Thanks,

[Redacted] (Redacted)

Assistant Field Office Director
Honolulu, Hawaii

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Please find attached the presentation for tomorrow. The video clips are embedded in the slides but if we are not able to show them it will not be a big deal... we are fine either way! Please let me know if you need anything else.

See you tomorrow!

Special Agent
Homeland Security Investigations

We are looking forward to your presentation. We are currently trying to resolve some technology issues, so I cannot promise we will be able to have things running to show short video clips just yet. In case the issues are not resolved before Thursday, please do send us the PowerPoint and we will print out copies for folks to have so they can follow along. Also, because I try to be optimistic about things, please send us the links/attachments for the video clips so we can have them ready to go in the event we get our technology issues resolved.

Thank you,

Hello,
I will send a copy of the PowerPoint as soon as I get it finalized. We will have a basic PowerPoint presentation so nothing special in regards to the technology needs. We sometimes include short video clips which would require an internet connection and audio capabilities but we certainly don’t have to include those if it is easier not to.

We look forward to presenting!

Thank you,

[Redacted]
Special Agent
Homeland Security Investigations
Parkway, Suite 200, Greenwood Village, CO 80111
Desk: (303) 721-2000, Cell: (303) 901-1000, Fax: (303) 721-3003

From: [Redacted]
Sent: Monday, April 16, 2018 1:43 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: OPLA Human Trafficking Presentation

Hi [Redacted]

I wanted to put you in touch with ACC [Redacted], who will be your POC for this Thursday’s event. Unfortunately, I am going to be out of town and won’t be able to attend. However, is very happy to assist with anything you need.

You will be presenting in our Law Library and will be connected to our remote offices (Salt Lake, downtown Denver, and GEO) by both VTC and conference call. Do you have any technology needs for the presentation? If there is a PowerPoint, would you mind if we sent it out to the participants who won’t be able to see the screen immediately before you begin?

We will come down to the lobby to escort you to our space. You will be able to bypass security with your credentials. I assume you all have been to JBB before, but if not here is the address: 12445 East Caley Avenue, Centennial, CO 80111.

Thank you again so much for coming to our space to speak with us! We are truly looking forward to your presentation!

Many thanks,

[Redacted]

[Redacted]
Deputy Chief Counsel
Department of Homeland Security
Immigration and Customs Enforcement
Denver Office of the Chief Counsel
Direct: (303) 784-2000 or via SECTOR

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July 27, 2018

Message from Secretary Kirstjen M. Nielsen on Family Reunifications and Securing the Border

As you are aware, we are in the midst of an illegal immigration crisis on our southern border that has been fueled by a decades-long failure to fully enforce our nation’s immigration laws. While DHS - and the full Administration - has worked to ensure no one is exempt from the consequences of violating our laws, we are also abiding by all court orders and the President’s Executive Order.

For years – and under previous Administrations – adults and children have been separated at our borders in cases where DHS is unable to determine there is a custodial relationship, when DHS determines that an adult may pose a risk to the child, or when an adult is charged with a crime and transferred to a criminal detention setting. On June 20th, the President signed an EO directing the administration to continue to protect the border and prosecute illegal crossers, while simultaneously avoiding separating families – to the extent we can legally do so.

As of this morning, the Administration can confirm that we have reunified all eligible parents in ICE custody with their children. The Department continues to comply in good faith with the court’s requests while protecting the safety and well-being of all children in our care. Some illegal alien adults are not eligible or available for reunification today, including some adults who are not in ICE custody and are instead in the interior of the U.S., are in their home country, or who have chosen not to be reunited with their children. I want to personally thank the men and women of OGC, ICE, and CBP who have been tirelessly working with the HHS to ensure these children are safely reunified with adults that have clear background checks.

This is no doubt a complex issue, and I am grateful for all of your professionalism and commitment to our mission over these past few months, which you continue to execute with respect and compassion. As I have said before, none of us signed up for the easy jobs – we wanted to solve the big problems that face this country. It is our responsibility to keep Americans safe and protect the homeland. Now more than ever we must rededicate ourselves to that mission.

As always, thank you for your continued commitment to serving our nation, thank you for your sacrifice in so doing, and thank you to your families.

Best regards,

Kirstjen M. Nielsen
Secretary of Homeland Security
Unaccompanied Alien Children Human Smuggling Disruption Initiative

Concept of Operations
May 5, 2017
Overview

U.S. Immigration and Customs Enforcement (ICE) proposes an interagency 90- to 120-day operation focusing on transnational criminal organizations (TCO) engaged in smuggling unaccompanied alien children (UAC) with an emphasis on the identification, investigation, and arrest of human smuggling facilitators, including, but not limited to, parents and family members.

Executive Summary

On January 25, 2017, President Donald J. Trump issued Executive Orders 13768, Enhancing Public Safety in the Interior of the United States, and 13767, Border Security and Immigration Enforcement Improvements. In support of these Executive Orders, ICE and its partners have developed this concept of operations to focus on disrupting and dismantling human smuggling organizations (HSO) engaged in smuggling UACs, and seeking the prosecution of each participant in the smuggling scheme, including the parents who engaged, when possible, the HSO’s services.

The risks associated with the UAC’s journey to the United States remain a constant humanitarian threat. Although the number of UACs being smuggled into the United States since the initial surge in 2014 has decreased, parents and family members who facilitate and promote the endangerment of these children by employing the HSOs have yet to be held accountable. Since parents and sponsors have not been held accountable for their role, there is no deterrent for complying with U.S. immigration laws.

Purpose

This concept of operations provides the framework for the proposed initiative and identifies specific roles for various U.S. Department of Homeland Security (DHS) Components. The three-phased approach is designed to mitigate the smuggling of UACs by parents and sponsors who use HSOs to facilitate their illegal entry into the United States.

Background

Since 2014, the Southwest Border region has seen an unprecedented flow of UACs entering the United States, primarily from Central America. During their journey to the border, the children are exposed to extreme conditions and physical abuse for which injury or death is a very real possibility. Over the past 2 years, DHS has learned a great deal about how UACs are smuggled into the United States and who ultimately receives them after they are transferred out of the custody of the U.S. Department of Health and Human Services (HHS) Office of Refugee and Resettlement (ORR). Since 2014, according to ORR data, approximately 90 percent of all UACs
are eventually turned over to a family member residing in the United States. Financial
transaction data and ICE Homeland Security Investigations (HSI) investigative records reviewed
by the DHS Human Smuggling Cell have further corroborated that parents of UACs have
engaged the services of HSOs to bring their children into the United States.

During the last quarter of Fiscal Year (FY) 2016 and through the first quarter of FY 2017, there
was a significant increase in the number of UACs encountered along the Southwest Border by
U.S. Customs and Border Protection (CBP). Since the implementation of the January 25, 2017
Executive Order, that number has decreased.

Mission

ICE will conduct a 90- to 120-day operation to focus on TCOs engaged in the smuggling of
UACs, with an emphasis on the human smuggling facilitators, including the parents and family
members who initiated and funded the smuggling venture.

Coordinating Instructions

The 26 HSI special agents in charge (SAC) will coordinate with their respective 24 ICE
Enforcement and Removal Operations (ERO) field office directors (FOD) to establish teams of
HSI special agents and ERO deportation officers, with the support of the local HSI SAC
intelligence program.

Each SAC will be responsible for determining how to document each UAC arrival in the
Investigative Case Management (ICM) system; however, it is recommended that every initial
UAC encounter at the border or its functional equivalent be documented in a general case opened
by each border operations team (Border team) in order to capture any applicable case and foreign
language hours.

If during the review for sufficiency or follow-up interview of the UAC and their respective
smuggler, it is determined a referral can be sent to another area of responsibility’s team (affected
AOR’s team) for further investigation, it is recommend that an independent case—separate from
the aforementioned general case—be opened in ICM by the Border team and a collateral case be
sent to the affected AOR’s team for follow up.

All cases opened during the operation will have the UAC project code applied, in addition to any
other applicable project codes.
Execution

This operation is a joint effort of ERO and HSI and is dependent on the collaboration of the field offices to ensure that all administrative and enforcement protocols for each Directorate are followed.

The initiative will be conducted in three sequential phases.

Phase I: Border encounter/lead referrals to affected AOR

Desired condition/endstate: significant decrease of UAC arrivals.

Upon a UAC encounter and detention, CBP will notify the Border team via email and include the executed Record of Inadmissible or Deportable Alien form (I-213) and interview notes. The Border team will immediately review the information for sufficiency and forward the information to the affected AOR's team and DHS Human Smuggling Cell for awareness.

- The teams will then have up to 72 hours from the time of the UAC encounter to complete sponsor/parent interviews and determine any appropriate initial enforcement actions. Border teams will not be required to perform detention duties or be responsible for the detention of the UACs.
- If sufficient information on parents or family members is obtained, a collateral case will be sent via ICM to the affected AOR’s team for action.
- Teams will be available to immediately conduct database checks and contact suspected sponsor/parent or family members to identify, interview, and, if applicable, seek charges against the individual(s) and administratively arrest the subjects and anybody encountered during the inquiry who is out of status.

Headquarters Responsibilities

- Three-phased media and congressional strategies will be developed by ICE’s Office of Public Affairs (OPA) and Office of Congressional Relations, respectively, and will be shared with SACs and FODs prior to and during the initiative.
- Coordination with the U.S. Department of Justice (DOJ) and HHS.
- The Human Smuggling Program will provide guidance to field components to ensure the effective implementation of the initiative.
SAC/FOD Responsibilities

- Field management will be jointly responsible for coordinating with local U.S. Attorney’s Offices (USAO)\(^1\) and their respective border security coordinators (ICE’s Office of the Principal Legal Advisor and OPA, and CBP’s Office of Field Operations and Office of Border Patrol).
- With operational security in mind, coordinate with local child protective services.
- Field management will establish mandatory response teams comprised of ERO deportation officers and HSI special agents, led by an HSI group supervisor.
  - Border teams will review CBP UAC encounter interviews and, if additional information is required will conduct UAC interviews while UACs are still in CBP or ERO custody.
    - Protocols will vary in AORs; however, detainee processing and court appearances will be jointly performed by HSI and ERO. Criminal and administrative arrests will be processed through the Enforcement Integrated Database Arrest Graphical User Interface for Law Enforcement.
    - HSI or ERO operational plans will be used for each interview and enforcement operation.
    - Application of designated program and operation codes.

Metrics Captured

- Number of criminal arrests (with association/relation to UACs);
- Number of referrals to ICE from CBP;
- Number of administrative arrests;
- Number of collateral arrests, both administrative and criminal;
- Number of cases that are declined prosecution (internal number for HSI headquarters to help address issues with DOJ); and
- Number of gang members/affiliates arrested.

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\(^1\) Field offices should consult with the local USAO regarding local prosecution guidelines that may affect operational feasibility.
Phase II: Analysis of historical U.S. Department of Health and Human Services sponsor/parent data

Desired condition/endstate: analysis of HHS sponsor/parent data to identify human smuggling organizations, networks, and facilitators smuggling UACs to take appropriate investigative/enforcement action as needed.

The operation will analyze historical ORR data from 2015 through 2017—beginning with the most current 2017 data—to identify associates of the HSOs responsible for facilitating the smuggling of UACs. Target packages will be provided to the affected AORs for subsequent follow-up. The ERO National Criminal Analysis and Targeting Center will conduct record checks for the teams and will be augmented with temporary duty HSI personnel to support the initiative. Targeting will be conducted based on ICE’s criteria factors.

- The HSI Human Smuggling Program will provide target packages to teams derived from HSI, ERO, and ORR data related to the sponsors/family members of the UACs listed as their sponsors.
  - The information will be used to open an investigation in ICM using historical information from UAC encounters from October to December 2016, including financial transaction data to support the smuggling scheme. (Illicit financial transactions through money service businesses (MSBs) are the primary method that HSOs use to facilitate the smuggling of UACs.)
- Teams will prioritize target lists and conduct operations, in coordination with the USAO in the affected judicial districts.
  - Prioritization will be based upon criminal history, removal status, immigration status, and other factors such as gang affiliation.
  - If appropriate, discretion may be used for sole caregivers and individuals with significant medical issues. Deferred action and other immigration benefits may be used for material witnesses.

Metrics Captured

- Number of criminal arrests (with association/relation to UAC);
- Number of administrative arrests;
- Number of collateral arrests, both administrative and criminal;
- Number of cases that are declined prosecution (internal number for HSI headquarters to help address issues with DOJ);
- Value of seized assets;
- Identify and report changes in frequency of UACs and family units encountered along the Southwest Border since May 2017; and,
• Intelligence and open-source reporting identifying the changes in the alien’s perception of the ability to enter and remain in the United States illegally (Attaché, field office, and detention facility reporting).

Phase III: Addressing the transnational criminal organizations

Desired condition/endstate: identify and disrupt the TCOs responsible for the smuggling of UACs.

Post-action analysis will be conducted to identify TCOs and be used to initiate domestic and international investigations and enforcement actions.
• Coordinate with ICE Attachés and foreign counterparts to identify and dismantle TCOs.
• HSI human smuggling program will extensively exploit financial transaction data using Transaction Record Analysis Center MSB data and FinCEN databases to identify networks and individuals suspected of illicit financial transactions indicative of human smuggling.
• HSI Human Smuggling Program will coordinate investigations derived from this operation.

Metrics Captured

• Identify and report changes in the frequency with which UAC and family units are encountered along the Southwest Border since May 2017;
• Intelligence and open-source reporting identifying the changes in the alien’s perception of the ability to enter and remain in the United States illegally (Attaché, field office, and detention facility reporting);
• Number of investigations initiated as a result of the initiative; and
• Number of civil immigration enforcement actions.
A Message from Executive Associate Director for Enforcement and Removal Operations and Senior Official Performing the Duties of the Deputy Director Matthew T. Albence

To All ICE Employees
November 9, 2018

Interim Guidance Regarding Custody Procedures for Aliens Subject to Expedited Removal

Today, the President issued a proclamation under sections 212(f) and 215(a)(1) of the Immigration and Nationality Act (INA), Addressing Mass Migration Through the Southern Border of the United States, which, subject to certain exceptions, suspends for 90 days the “entry of any alien into the United States across the international boundary between the United States and Mexico.” Most notably, the suspension of entry does not apply to “any alien who enters the United States at a port of entry and properly presents for inspection, or to any lawful permanent resident of the United States.”

Also today, the Department of Justice and the Department of Homeland Security (DHS) published a joint interim final rule titled, Aliens Subject to a Bar on Entry under Section 212(f): Procedures for Protection Claims (“the IFR”), in the Federal Register. 83 Fed. Reg. 55934 (Nov. 9, 2018). The IFR, which is effective immediately, provides that aliens subject to a suspension of entry under a proclamation concerning the southern border with Mexico – such as that issued today – but who contravene such a proclamation by entering the United States unlawfully on or after the effective date of such a proclamation, are ineligible for asylum. Aliens rendered ineligible for asylum by the IFR and who are referred for a credible fear interview in the expedited removal process are still eligible to seek withholding of removal under 241(b)(3) of the INA, or protection under the regulations implementing U.S. obligations under Article 3 of the Convention Against Torture. Rather than establishing a “credible fear” of persecution or torture, however, such aliens would be permitted to pursue such claims in removal proceedings before an immigration judge under section 240 of the INA only if they establish a “reasonable fear” of persecution or torture.

The presidential proclamation and the IFR do not impact the role and responsibilities of U.S. Immigration and Customs Enforcement (ICE) immigration officers with regard to the credible fear screening process. Consistent with existing requirements, when an alien in the INA section 235(b)(1) expedited removal process indicates to an ICE immigration officer an intention to apply for asylum or expresses a fear of return, including any verbal or non-verbal indications that the alien may be afraid to return to his or her homeland, the officer must refer the alien for a credible fear interview before a U.S. Citizenship and Immigration Services asylum officer. The ICE immigration officer makes no qualitative determination regarding the claim of fear.

Detention and Release Authorities
In light of these legal developments, this message provides clarification of the detention and release authorities applicable to different categories of aliens in the expedited removal process, including those ineligible for asylum due to the presidential proclamation and the IFR referenced above, but who are referred for removal proceedings after establishing a reasonable fear of persecution or torture.

**Arriving Aliens**

Arriving aliens—aliens encountered at a port of entry or interdicted in international or U.S. waters and brought to the United States—subject to expedited removal but determined to possess a credible fear and referred for removal proceedings under section 240 of the INA are subject to mandatory detention during such removal proceedings. INA § 235(b)(1)(B)(ii); 8 C.F.R. § 235.3(c). Immigration judges lack the authority to re-determine custody of arriving aliens. 8 C.F.R. § 1003.19(h)(2)(B).

ICE, however, maintains discretion pursuant to section 212(d)(5) of the INA to parole such aliens for “urgent humanitarian reasons or significant public benefit.” See 8 C.F.R. § 235.3(c). The regulations identify five general categories of aliens who may meet the standard on a case-by-case basis: aliens with serious medical conditions; pregnant women; juveniles; certain witnesses; and “aliens whose continued detention is not in the public interest.” 8 C.F.R. § 212.5(b)(1)–(5). Pursuant to ICE Policy No. 11002.1: *Parole of Arriving Aliens Found to Have a Credible Fear of Persecution or Torture* (Dec. 8, 2009), absent additional factors weighing against release, where an arriving alien determined to possess a credible fear establishes the satisfaction of the ICE immigration officer his or her identity and that he or she does not pose a flight risk or danger to the community, it is presumptively deemed “not to be” in the public interest for such alien to be detained.

The presidential proclamation and the IFR do not impact the detention and release authorities applicable to arriving aliens.

**Certain Other Aliens**

With regard to aliens subject to expedited removal, who are encountered outside a port of entry, within 14 days of entry, and within 100 air miles of the U.S. international border—referred to as “certain other aliens”—historically, the DHS took the position that those aliens, after referral for removal proceedings under section 240 of the INA, remain ineligible for bond and/or a custody redetermination before an immigration judge.

On May 4, 2005, however, the Board of Immigration Appeals (Board) issued *Matter of X-K*., 23 I&N Dec. 731 (BIA 2005), holding that immigration judges have jurisdiction to consider bond for “certain other aliens,” who were initially considered for expedited removal, but referred to the immigration court for removal proceedings under INA § 240. The Board relied in part upon the regulation at 8 C.F.R. § 1236.1(d)(1), which “specifically states that until there is a final removal order in the section 240 removal proceedings, Immigration Judges have jurisdiction to exercise the authority in section 236 of the Act . . . to detain the alien in custody, release the alien, and determine the amount of bond . . . as provided in § 1003.19.” *Id.* at 732. The Board also considered the classes of aliens expressly excluded from the jurisdiction of immigration judges, 8 C.F.R. § 1003.19(h)(2)(i), and noted that the “list does not include aliens [] who have been placed in 240 removal proceedings after having been
initially screened and detained for expedited removal as ‘certain other aliens’ pursuant to the authority in section 235(b)(1)(A)(iii) of the Act.” Id. Pursuant to existing precedent, such aliens are now detained pursuant to INA § 236(a) or 236(c) depending upon the facts of the individual case.

The Board’s decision in Matter of X-K- would apply with equal force to aliens ineligible for asylum due to the presidential proclamation and the IFR referenced above, but who are referred for removal proceedings under section 240 of the INA after having established a reasonable fear of persecution or torture.

Accordingly, upon referral for removal proceedings under section 240 of the INA, an immigration officer should conduct a custody determination, using Form I-286 (Notice of Custody Determination) in such cases. As with any other case in which an alien is detained pursuant to ICE’s pre-order custody authority under INA § 236, unless that alien is subject to mandatory detention under INA § 236(c), ICE immigration officers have the discretionary authority to release an alien who demonstrates to their satisfaction that release would not pose a danger to property or persons and that he or she is likely to appear for any future proceedings. See 8 C.F.R. § 236.1(c)(8).

- An alien whose release would pose a danger to property or persons or a threat to national security may not be released, and bond is never appropriate for such aliens. See Matter of Fatahi, 26 I&N Dec. 791 (BIA 2016); Matter of Urêña, 25 I&N Dec. 140 (BIA 2009).

- In determining whether an alien should be released on bond or his or her own recognizance, relevant factors include, but are not limited to: (1) whether the alien has a fixed address in the United States; (2) the alien’s length of residence in the United States; (3) the alien’s family ties in the United States, and whether they may entitle the alien to reside permanently in the United States in the future; (4) the alien’s employment history; (5) the alien’s record of appearance in court; (6) the alien’s criminal record, including the extensiveness of criminal activity, the recency of such activity, and the seriousness of the offenses; (7) the alien’s history of immigration violations; (8) any attempts by the alien to flee prosecution or otherwise escape from authorities; and (9) the alien’s manner of entry to the United States. Matter of Guerra, 24 I&N Dec. 37 (BIA 2006).

These custody determinations will be subject to review by an immigration judge. The presidential proclamation and the IFR do not impact the detention and release authorities applicable to “certain other aliens” subject to expedited removal.

NOTE: On October 12, 2018, the Attorney General directed the Board to refer for his review its decision in Matter of M-S-, to address whether the Board’s decision in Matter of X-K-, should be overruled. See Matter of M-S-, 27 I&N Dec. 476 (A.G. 2018). DHS has argued that the Attorney General should overrule Matter of X-K- and hold that immigration judges lack authority to conduct bond hearings for aliens who DHS detains under section 235(b) of the INA following referral for INA § 240 removal proceedings. Further guidance will be forthcoming, as appropriate, when a decision is issued in that case.

Aliens Subject to a Final Expedited Removal Order

As set forth in regulations, an alien who has been issued an expedited removal order “shall be detained pending . . . removal.” 8 C.F.R. § 235.3(b)(2)(iii). Aliens subject to an expedited
removal order are not detained pursuant to the post-order custody provisions of section 241(a) of the INA and are not eligible for release on an order of supervision. Such aliens may only be released from custody on parole on a case-by-case basis in the limited circumstances where "parole is required to meet a medical emergency or is necessary for a legitimate law enforcement objective."  Id.

The presidential proclamation and the IFR do not impact the detention and release authorities applicable to aliens subject to a final expedited removal order.

Any questions relating to the presidential proclamation, IFR, or detention and release authorities should be directed to OPLA.

Thank you for your continued dedication and service in support of the ICE mission.

Matthew T. Albence  
Executive Associate Director for Enforcement and Removal Operations and Senior Official Performing the Duties of the Deputy Director  
U.S. Immigration and Customs Enforcement
A Message from Deputy Director and Senior Official Performing the Duties of the Director Thomas D. Homan

To All ICE Employees
January 24, 2018

The Responsible Exercise of the Department’s Detention Authorities

As we continue to implement the President’s executive orders, it is imperative that you ensure the responsible exercise of the Department’s detention authorities, including limitations on U.S. Immigration and Customs Enforcement’s (ICE) discretion to release certain categories of aliens from custody. In Executive Order No. 13,768, Enhancing Public Safety in the Interior of the United States, the President directed that we “[m]ake use of all available systems and resources to ensure the efficient and faithful execution of the immigration laws of the United States.” 82 Fed. Reg. 8799 (Jan. 25, 2017). As made clear in former Secretary Kelly’s February 20, 2017 memorandum, Enforcement of the Immigration Laws to Serve the National Interest, “the Department no longer will exempt classes or categories of aliens from potential enforcement.”

To that end, in Executive Order No. 13,767, Border Security and Immigration Enforcement Improvements, the President directed that the “Secretary shall immediately take all appropriate actions to ensure the detention of aliens apprehended for violations of immigration law pending the outcome of their removal proceedings or their removal from the country to the extent permitted by law.” 82 Fed. Reg. 8793, 95 (Jan. 25, 2017). While our detention authorities may be relentlessly challenged in the federal courts, we continue to fiercely defend them and you must continue to act within the bounds of ICE’s legal authorities. And, absent a court order, the law generally prohibits the release of an alien whose release would pose a danger to the community.

Mandatory Detention
Consistent with sections 236(c) (detention of certain categories of criminal and terrorist aliens during removal proceedings) and 241(a)(2) (detention of certain aliens inadmissible or deportable under the criminal, terrorist, or security-related grounds during the 90-day removal period) of the Immigration and Nationality Act (INA), ICE may not release any alien subject to mandatory detention unless ordered by a court. Arriving aliens detained under section 235(b) of the INA may only be released on parole at the discretion of ICE. Of course, case law, including the decision of the U.S. Court of Appeals for the Ninth Circuit in Rodriguez v. Robbins, 804 F.3d 1060 (9th Cir. 2015), cert. granted, Jennings v. Rodriguez, 136 S. Ct. 2489 (mem.) (2016), has eroded the applicability of these mandatory detention provisions in some jurisdictions. For this reason, it is important that Enforcement and Removal Operations continue to consult with the Office of the Principal Legal Advisor on detention-related issues.

Discretionary Detention
For aliens subject to discretionary detention during the pendency of removal proceedings, under INA section 236(a), the law places the burden on the alien to “demonstrate to the
satisfaction of the officer that such release would not pose a danger to property or persons, and that the alien is likely to appear for any future proceeding[.]” 8 C.F.R. § 236.1(c)(8), before an officer may even consider release. Although the risk of flight may be ameliorated through the imposition of conditions on release, such as bond or enrollment in the Alternatives to Detention Program, danger cannot be ameliorated. ICE officers do not have the discretion to release an alien whose release would pose a danger to persons or property.

Accordingly, absent a court order or the requirements of Zadvydas v. Davis, 533 U.S. 678 (2001), ICE should never release a removable alien from its custody if such release would pose a danger to the community. While bed space may be limited, under no circumstances should we be releasing an alien in our discretion who poses a danger to the community. For aliens who do not pose a danger or flight risk, ICE officers should continue to examine all relevant information when making discretionary custody determinations.

We will continue to maintain our commitment to the rule of law and faithfully execute our sworn duty to enforce our immigration laws. Thank you for your continued dedication to our agency’s critical mission. I appreciate your commitment to the safety and security of the American people and I am honored to serve with you.

Thomas D. Homan
Deputy Director and Senior Official Performing the Duties of the Director
U.S. Immigration and Customs Enforcement
A Message from the Office of the Principal Legal Advisor

To All ICE Employees
August 22, 2018

Court-Ordered Notice to ICE Employees About a Temporary Restraining Order Issued in Pending Family Separation Litigation

For the last several months, the U.S. Immigration and Customs Enforcement (ICE) Office of the Principal Legal Advisor (OPLA) has been defending the agency's interests in multiple lawsuits related to the U.S. Government's separation of alien families at the border. One of the cases, Ms. L. v. ICE, No. 18-428 (S.D. Cal. filed February 26, 2018), involves a class of certain alien parents who were separated from their children by the U.S. Government. Another case, M.M.M. v. Sessions, No. 18-1832 (S.D. Cal. filed July 27, 2018), addresses the rights of the children.

On August 16, 2018, the U.S. District Court for the Southern District of California issued a nationwide temporary restraining order (TRO) in the M.M.M. case, which affects class members in Ms. L. and their children. The Court found that the children are entitled to have their own claims for asylum considered—regardless of any desire expressed by their parents to be reunited for removal—while the parties work on resolving how this will be accomplished. Accordingly, the TRO stays the removal of both the parents and the minor children involved in the Ms. L. and M.M.M. cases. All efforts to remove these individuals should cease until further notice.

In its TRO decision, the Court also directed that a copy of the order be provided "to any person or entity that may be subject to any provisions of this Order, including their officers, agents, servants, employees, attorneys, and all those who are in active concert or participation with them or have any involvement in the removal of individuals from the United States." As such, the TRO is attached to this message.

Please review the terms of this order carefully, and contact OPLA if you have any questions or concerns regarding the order or this broadcast at OPLA-DCLD@DOL and ICE-OPLA-EROLD@DOL.

Michael P. Davis
Executive Deputy Principal Legal Advisor
Office of the Principal Legal Advisor
On September 6, 2017, Homeland Security Investigations (HSI) arrested two (2) adult family members on the Island of Maui. This couple had two minor children. This same day, this couple was flown to the Island of Oahu for their Initial Appearance. It was the wish of one of the arrestees to have their children stay with their neighbor. A power of attorney was executed for the neighbor to serve as guardian.

On September 7, 2017, the maternal family member was placed on supervision by US Pretrial Services and she rejoined her children on the Island of Maui.

On September 14, 2017, the paternal family member was placed on supervisor by US Pretrial Services and he joined his children and the mother of his children on the Island of Maui.

On December 13, 2017, each adult subject was Sentenced, separately, for Title 8 USC 1325 (c), Marriage Fraud.
United States of America

V.

Defendant

Case No. Mag. No. 17-1021 RLP

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested)

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☑ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. §371 Conspiracy to Defraud the U.S.

Date: ___________

City and state: Honolulu, Hawaii

Issuing officer's signature

Printed name and title

Return

This warrant was received on (date) 3/31/2017, and the person was arrested on (date) 9/6/2017

at (city and state) HONOLULU, HAWAII

Date: 9/6/2017

Special Agent
United States of America  

V.  

Defendant

Case No. Mag. No. 17-1021 RLP

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) [Masked]

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment  ☐ Superseding Indictment  ☐ Information  ☐ Superseding Information  ☑ Complaint  ☐ Probation Violation Petition  ☐ Supervised Release Violation Petition  ☐ Violation Notice  ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. §371 Conspiracy to Defraud the U.S.
8 U.S.C. §1325(c) Marriage Fraud
18 U.S.C. §1546 Fraud and Misuse of Visas, Permits and Documents

Date: 1/2/2017

City and state: Honolulu, Hawaii

United States Magistrate Judge

This warrant was received on (date) 8/31/2017, and the person was arrested on (date) 9/6/2017

Date: 9/6/2017
**United States District Court**

**District of Hawaii**

**UNITED STATES OF AMERICA**

v.

**JUDGMENT IN A CRIMINAL CASE**

Case Number: 1:17CR00556-001

USM Number: 10153-122

Defendant's Attorney

## THE DEFENDANT:

- [✓] pleaded guilty to count: 1 of the Information.
- [ ] pleaded nolo contendere to counts(s) ___ which was accepted by the court.
- [ ] was found guilty on count(s) ___ after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

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<th>Count</th>
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<td>8 U.S.C. § 1325(c)</td>
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<td>02/09/2014</td>
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The defendant is sentenced as provided in pages 2 through 4 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

- [ ] The defendant has been found not guilty on counts(s) ___ and is discharged as to such count(s).
- [ ] Count(s) ___ (is)are dismissed on the motion of the United States.

It is further ordered that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States Attorney of material changes in economic circumstances.

**December 13, 2017**

Date of Imposition of Judgment

[Signature of Judicial Officer]

United States District Judge

Name & Title of Judicial Officer

[12/13/17]

Date
The 4th works for me, I will be out of the office on the 5th.

Thanks.

Sent with BlackBerry Work
(www.blackberry.com)

From: Foundationforchildren.org
Date: Tuesday, Sep 25, 2018, 7:15 AM
To: Foundationforchildren.org
Subject: Human Trafficking Law Enforcement training - planning meeting

RAC and Detective.

Hope you are both doing great.

Major with ERASE Child Trafficking training has scheduled to come to Charleston on Oct. 4 and Oct. 5 to plan for the upcoming Nov. 28-30 ERASE training. He would like to meet with you both to discuss HT in our area and your experience with the National HT Hotline.

Would you be available to meet with him anytime after 12:00 noon on Thursday, Oct. 4 or after 1:00 on Oct. 5? He is meeting with Sheriff Cannon on Oct. 5 at 9am and the Charleston Sheriff's Detective and data analyst on Oct. 5 as well. I also reached out to Chief and to see if they would have time to meet as well (so it is possible that the availability changes). Thanks!


eq.

Tri-County Human Trafficking Task Force, Chair
Lynch Foundation for Children, Director of Policy
lynchfoundationforchildren.org
Thank you for your quick reply. I understand you are meeting with Sheriff on Thursday. She will be able to discuss the training as well. I will be out of town the rest of this week but can meet at your convenience the week of 8/13.

Best Regards,

On Tue, Aug 7, 2018 at 9:11 AM, wrote:

I think a meeting would be great. Let me know what works for you and we can figure out a date and time that works best.

I look forward to meeting you.

Resident Agent in Charge
ICE-Homeland Security Investigations (HSI)

3950 Faber Place Drive Suite 
North Charleston, SC 29405
Office: (843) 740-
Good Morning,

I believe you have previously met with the SC Attorney General’s Tri-County HT Coordinator. I am assisting her to coordinate a Human Trafficking training in November, 2018. I am a retired FBI agent currently living in Mt. Pleasant. My career was in Atlanta and in addition to other matters, I have worked domestic and international human and smuggling investigations. I have also worked with retired ICE RAC, with the Quick Group. I invite you to contact him should you need to check my credentials.

I have learned through contacts with the local police agencies, child advocacy groups and social services agencies that a human trafficking training would be beneficial for the Charleston Tri-County area. She contacted ERASE (see attached agenda) for a speaker and they have agreed to a 2-3 day training for law enforcement personnel. I have looked the agenda and it appears it would be most informative and he would fashion it to the needs of the Charleston area. The Riley Center has agreed to host the training and can accommodate thirty-two (32) officers. There will most likely be a nominal fee of $50.00 per agent/officer to defray the cost of drinks/snacks/lunch. Training for other service groups would be offered at a later date.

I am in contact with SLED and they believe they will be able to approve the training for CEU hours for the officers. We believe this would encourage a larger audience.

We respectfully request that HSI-ICE endorse this training and support our effort to provide a better understanding of human trafficking to those on the street encountering these situations.

I have attached what we have received from ERASE. Please let me know if you would like to schedule a meeting to discuss this further.

Thank you,

Retired FBI, Atlanta
Response to FOIA request

Special Agent

Immigration and Customs Enforcement (ICE)
Homeland Security Investigations (HSI)

This is the Number of 8USC1326 arrests where the subject is believed to have a family and was living with the family at the time of arrest.

There were 7 separate cases involving arrest for 8USC1326, Reentry of removed aliens, where the subject, at a minimum stated they had a family in the US and they lived with said family. Erring on the side of providing information, I included subjects that stated they had children but that the children were not their biological children. Nor had they adopted the children but did lived in the same home with the biological mother.

1 8USC1326 reentry prosecution and conviction – underlying conviction for deportation, murder
1 8USC1326 reentry prosecution and conviction - underlying conviction is felony drugs
1 8USC1326 reentry presented and declined - underlying conviction was sex offence
1 8USC1326 reentry presented and declined - underlying warrant DWI
1 8USC1326 reentry prosecution and conviction – underlying conviction was robbery
1 8USC1326 reentry presented and declined due to time of getting A file
1 8USC1326 reentry arrest, turned over to state on felony warrant – underlying conviction was sexual assault
# Blue Campaign Human Trafficking Awareness Outreach

## Case Identifiers

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## Case Indicators

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| OCDETF Indicator | No |

**Worksite Case Details**

| Worksite Indicator? | No |

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**Restrict Visibility**

| Groups Visible To | Restricted |

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Narrative

Department of Homeland Security (DHS), Homeland Security Investigations (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.
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CASE NUMBER

SYNOPSIS

Department of Homeland Security (DHS), Homeland Security Investigations (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

This report will serve to document the Human Trafficking Awareness presentation and training conducted at the Children Youth and Families (CYFD) Department in Silver City, NM.

REPORTED BY

SPECIAL AGENT

APPROVED BY

SUPERVISORY SPECIAL AGENT

DATE APPROVED
1/4/2018

Current Case Title

Blue Campaign Human Trafficking Awareness Outreach

ROI Number

Date Approved
1/4/2018
DETAILS OF INVESTIGATION

DETAILS OF INVESTIGATION:

This report will serve to document the Human Trafficking Awareness presentation and training conducted at the Children Youth and Families (CYFD) Department in Silver City, NM.

On January 3, 2018, HSI Special Agent (S/A) [redacted] conducted a Human Trafficking Awareness power point presentation and training session at the CYFD in Silver City, NM. Intelligence Research Specialist (IRS) [redacted] was also present during the presentation.

Along with the training, HSI distributed Blue Campaign posters and Human Trafficking cards to those in attendance. There were a total of sixteen (16) individuals who attended and represented the following state departments CYFD, Juvenile Probation Office (JPO), Truancy, Border Area Mental and Health Services (BAMHS) and Child Protective Services (CPS) in Grant County, New Mexico.

HSI S/A [redacted] and IRS Mesa met with several of the JPO's after the training to discuss potential human trafficking cases and to provide further one on one training dealing with at risk juveniles.
CASE OPENED
12/21/2017

CURRENT CASE TITLE
Blue Campaign Human Trafficking Awareness Outreach

REPORT TITLE
Presentation at the District Att. Sixth Judicial Office in Deming, NM

SYNOPSIS
Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY
TASK FORCE OFFICER

APPROVED BY
SUPERVISORY SPECIAL AGENT

DATE APPROVED
1/9/2018
DETAILS OF INVESTIGATION

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

This report will serve to document the Human Trafficking Awareness presentation conducted at the District Attorney Sixth Judicial, & Hidalgo Counties Office at 108 E. Poplar St. in Deming, NM.

DETAILS OF INVESTIGATION:

On January 5, 2018, HSI Special Agent’s (S/A) [Redacted] and Deportation Officer (DO) [Redacted] conducted a Human Trafficking Awareness (HTA) presentation at the District Attorney Sixth Judicial, Luna, Hidalgo, and Grant Counties Office in Deming, NM. The details of the presentation are contained within this report.

The presentation with Deming Victim Advocate Coordinator’s stakeholders from RAC Deming AOR included: Victim District Office Manager Victim Advocate (VA) Supervisors [Redacted], VA Pat [Redacted], and VA [Redacted]. Along with the presentation, HSI agents distributed Blue Campaign posters, and Human Trafficking cards to all stakeholders.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the HTA initiative.

INVESTIGATION CONTINUES
Blue Campaign Human Trafficking Awareness Outreach FY-2019

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Narrative

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CASE OPENED
10/2/2018

CURRENT CASE TITLE
Blue Campaign Human Trafficking Awareness Outreach...

REPORT TITLE
Meeting with Family Support Services (FSS) Coordinator

SYNOPSIS
Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) Officers within the Deming AOR.

REPORTED BY

TASK FORCE OFFICER

APPROVED BY

SPECIAL AGENT

DATE APPROVED
11/8/2018

Current Case Title
Blue Campaign Human Trafficking Awareness Outreach...

ROI Number

Date Approved
11/8/2018
DETAILS OF INVESTIGATION

This report will serve to document the Blue Campaign Human Trafficking Awareness meeting conducted at the Family Support Services (FSS) at 530 De Moss St., Lordsburg, NM. The details of the meeting are contained within this report.

DETAILS OF INVESTIGATION:

On November 7, 2018, Border Enforcement Security Task (BEST) Force Supervisor (BFS) and Border Protection Officer (CBPO) attended the Teen Maze 2018 meeting at the FSS Office and discussed Human Trafficking Awareness (HTA) issues.

The meeting was with the Hidalgo Medical Services (HMS) Victim Advocate/Community Coordinator's stakeholders from RAC Deming AOR that included: Family Support Service HMS Victim Coordinator, Hidalgo Medical Services (HMS) and HSI Agents discussed potential human trafficking cases and would provide further assistance with any training that deal with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI Agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES.

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SYNOPSIS

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY

TASK FORCE OFFICER

APPROVED BY

SUPERVISORY SPECIAL AGENT

DATE APPROVED
1/10/2018

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DETAILS OF INVESTIGATION

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

This report will serve to document the Human Trafficking Awareness presentation and training conducted at the New Mexico Children Youth & Families Department (CYFD) 918 E. Pear St. in Deming, NM.

DETAILS OF INVESTIGATION:

On January 9, 2018, HSI Special Agent’s (S/A) [redacted] and Deportation Officer (DO) [redacted] conducted a Human Trafficking Awareness (HTA) presentation at the CYFD Office in Deming, NM. The details of the presentation are contained within this report.

The presentation with the Deming Victim Advocate Coordinator’s stakeholders from RAC Deming’s AOR included a total of twelve (12) individuals that attended and representing the following State Department Agencies; District Attorney Officer (ADO) [redacted], Assistant District Attorney (ADA) [redacted], Director Healing House, and Juvenile Probation Officer (JPO) are part of the Luna Co. Hidalgo Co, and Grant Co, CYFD New Mexico Offices. Along with the presentation, HSI agents distributed Blue Campaign posters, and Human Trafficking cards to all stakeholders.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the HTA initiative.

INVESTIGATION CONTINUES
Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2019. This case will serve to document the outreachs and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY

TASK FORCE OFFICER

APPROVED BY

SUPERVISORY SPECIAL AGENT

DATE APPROVED

5/9/2018
DETAILS OF INVESTIGATION

This report will serve to document the Human Trafficking Awareness meeting conducted at the Children Youth & Families Department (CYFD) Office at 918 E. Pear St. in Deming, NM.

DETAILS OF INVESTIGATION:

On May 8, 2018, HSI Special Agent (S/A) [Redacted], Customs and Border Protection Officer (CBPO) [Redacted] and Deportation Officer (DO) [Redacted] attended a meeting at the CYFD Office in Deming, and discussed Human Trafficking Awareness (HTA) issues. The details of the meeting are contained within this report.

The meeting with Deming Victim Advocate Coordinator’s stakeholders from RAC Deming AOR included: Rural Program Manager [Redacted] CYFD [Redacted] and Sixth Judicial District Office Victim Coordinator [Redacted]. Along with the meeting, HSI agents discussed potential human trafficking cases and provide further assistance, with any training, dealing with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES
**CASE NUMBER**

[Redacted]

**CASE OPENED**

12/21/2017

**CURRENT CASE TITLE**

Blue Campaign Human Trafficking Awareness Outreach

**REPORT TITLE**

Monthly Meeting with Victim Advocate Coordinator's in Deming, NM Stakeholders

**SYNOPSIS**

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

**REPORTED BY**

[Redacted]

**TASK FORCE OFFICER**

**APPROVED BY**

[Redacted]

**SUPERVISORY SPECIAL AGENT**

**DATE APPROVED**

5/9/2018

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DETAILS OF INVESTIGATION

This report will serve to document the Human Trafficking Awareness meeting conducted at the Children Youth & Families Department (CYFD) Office at 918 E. Pear St. in Deming, NM.

DETAILS OF INVESTIGATION:

On May 8, 2018, HSI Special Agent (S/A) [redacted], Customs and Border Protection Officer (CBPO) [redacted] and Deportation Officer (DO) [redacted] attended a meeting at the CYFD Office in Deming, and discussed Human Trafficking Awareness (HTA) issues. The details of the meeting are contained within this report.

The meeting with Deming Victim Advocate Coordinator’s stakeholders from RAC Deming AOR included; Rural Program Manager [redacted], CYFD [redacted], and Sixth Judicial District Office Victim Coordinator [redacted]. Along with the meeting, HSI agents discussed potential human trafficking cases and provide further assistance, with any training, dealing with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES
DEPARTMENT OF HOMELAND SECURITY
HOMELAND SECURITY INVESTIGATIONS
REPORT OF INVESTIGATION

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

11/19/2018 17:26 EST
Page 1 of 2

CASE NUMBER
(0)(6)(7)(7)(C)

CASE OPENED
12/21/2017

CURRENT CASE TITLE
Blue Campaign Human Trafficking
Awareness Outreach

REPORT TITLE
Monthly Meeting with Victim
Advocate Coordinator's in RAC
Deming, NM Stakeholders

SYNOPSIS

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY
(0)(6)(7)(7)(C)

TASK FORCE OFFICER

APPROVED BY
(0)(6)(7)(7)(C)

SUPERVISORY SPECIAL AGENT

DATE APPROVED
7/24/2018

Current Case Title
ROI Number
Date Approved
Blue Campaign Human Trafficking
Awareness Outreach
7/24/2018

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DEPARTMENT OF HOMELAND SECURITY  
HOMELAND SECURITY INVESTIGATIONS  
REPORT OF INVESTIGATION  
OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

DETAILS OF INVESTIGATION

This report will serve to document the Human Trafficking Awareness meeting conducted at the Children Youth & Families Department (CYFD) Office at 918 E. Pear St. in Deming, NM.

DETAILS OF INVESTIGATION:

On July 19, 2018, Border Enforcement Security Task (BEST) Force Customs and Border Protection Officer (CBPO) [REDACTED] and Deportation Officer (DO) [REDACTED] attended a meeting at the CYFD Office in Deming, and discussed Human Trafficking Awareness (HTA) issues. The details of the meeting are contained within this report.

The meeting with Deming Victim Advocate Coordinator’s stakeholders from RAC Deming AOR included; Rural Program Manager [REDACTED] and Sixth Judicial District Office Victim Coordinator Pat Anchiesta. Along with the meeting, HSI agents discussed potential human trafficking cases and provide further assistance, with any training, dealing with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES

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CASE NUMBER

CASE OPENED
12/21/2017

CURRENT CASE TITLE
Blue Campaign Human Trafficking Awareness Outreach

REPORT TITLE
National Night Out Event in Deming, NM.

SYNOPSIS
Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreachs and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY

TASK FORCE OFFICER

SUPERVISORY SPECIAL AGENT

DATE APPROVED
8/14/2018

Current Case Title | ROI Number | Date Approved
--- | --- | ---
Blue Campaign Human Trafficking Awareness Outreach | (b)(6),(b)(7)(C) | 8/14/2018
DEPARTMENT OF HOMELAND SECURITY
HOMELAND SECURITY INVESTIGATIONS
REPORT OF INVESTIGATION

DETAILS OF INVESTIGATION

This report will serve to document the National Night Out event held at the Deming, NM County Court House Park at 912 S. Silver Ave. As part of the Blue Campaign/Human Trafficking Awareness (HTA) Community outreach initiative. The details of the event are obtained within this report.

DETAILS OF INVESTIGATION:

On August 7, 2018, Border Enforcement Security Task (BEST) Force Customs and Border Protection Officer (CBPO) [redacted], Special Agent (SA) [redacted], (SA) [redacted], and Deportation Officer (DO) [redacted] attended the National Night Out event. Along with Deming, NM Stakeholders; Deming Police Department, Luna County Sheriff’s Office, Deming Fire/EMS Department, New Mexico State Police, Children Youth & Families Service (CYFD) Department. HSI Agents handed out brochures, pencils, notebooks, and other school supplies. Agents informed the general public, how important it is to report any type of human smuggling, abuse, and any suspicious activity.

All stakeholders at the event were every cooperative and are aware to report any suspicious activity. HSI agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES

Current Case Title
Blue Campaign Human Trafficking Awareness Outreach

ROI Number
[redacted]

Date Approved
8/14/2018
SYNOPSIS

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreachs and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY
TASK FORCE OFFICER

APPROVED BY
SUPERVISORY SPECIAL AGENT

DATE APPROVED
8/15/2018

Current Case Title
Blue Campaign Human Trafficking Awareness Outreach

ROI Number

Date Approved
8/15/2018
DETAILS OF INVESTIGATION

This report will serve to document the Human Trafficking Awareness meeting conducted at the Lordsburg, NM Border Patrol Station on 26 Pipeline Road. The details of the meeting are contained within this report.

DETAILS OF INVESTIGATION:

On August 14, 2018, Border Enforcement Security Task (BEST) Force Special Agent (SA) and Deportation Officer (DO) attended a meeting at the Lordsburg Border Patrol Station, and discussed Human Trafficking Awareness (HTA) issues.

The meeting with Deming Victim Advocate Coordinator’s stakeholders from RAC Deming AOR included: Rural Program Manager and Sixth Judicial District Office Victim Coordinator, Hidalgo Medical Services (HMS), and . HSI Agents discussed potential human trafficking cases and provide further assistance, with any training, dealing with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI Agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

INVESTIGATION CONTINUES

Current Case Title | ROI Number | Date Approved
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Blue Campaign Human Trafficking Awareness Outreach | | 8/15/2018
CASE NUMBER
[Redacted]

CASE OPENED
12/21/2017

CURRENT CASE TITLE
Blue Campaign Human Trafficking Awareness Outreach

REPORT TITLE
Blue Campaign Monthly Out Meeting with Hidalgo County Stakeholders

SYNOPSIS
Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreaches within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreaches and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

REPORTED BY
[Redacted]

TASK FORCE OFFICER

APPROVED BY
[Redacted]

SUPERVISORY SPECIAL AGENT

DATE APPROVED
9/5/2018

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DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

REPORT OF INVESTIGATION

OFFICIAL USE ONLY | LAW ENFORCEMENT SENSITIVE

11/19/2018 17:31 EST

Page 2 of 2

DETAILS OF INVESTIGATION

This report will serve to document the Blue Campaign Human Trafficking Awareness meeting conducted at the Family Support Services, (HMS) at 530 De Moss St., Lordsburg, NM. The details of the meeting are contained within this report.

DETAILS OF INVESTIGATION:

On September 5, 2018, Border Enforcement Security Task (BEST) Force Supervisory Customs and Border Protection Officer (CBPO) [REDACTED] and Deportation Officer (DO) [REDACTED] attended the Teen Maze 2018 meeting at the HMS Office, and discussed Human Trafficking Awareness (HTA) issues.

The meeting with HMS Victim Advocate/Community Coordinator’s stakeholders from RAC Deming AOR included: Rural Program Manager [REDACTED] and Sixth Judicial District Office Victim Coordinator [REDACTED] Hidalgo Medical Services (HMS) [REDACTED], and [REDACTED] HSI. Agents discussed potential human trafficking cases and provide further assistance, with any training, dealing with at risk juveniles.

All stakeholders were very cooperative and are aware to report any suspicious activity. HSI Agents will follow up with all stakeholders. Agents will document any further updates reports and/or concerns the stakeholders, might have concerning the Blue Campaign/Human Trafficking Awareness initiative.

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CASE NUMBER

SYNOPSIS

Department of Homeland Security (DHS), Homeland Security Investigation (HSI) Resident Agent in Charge (RAC) Deming is conducting Blue Campaign Outreachs within the Deming area of responsibility (AOR) in honor of the Blue Campaign / Human Trafficking Awareness Month in January 2018. This case will serve to document the outreachs and Human Trafficking training presentations conducted by HSI Deming agents and Border Enforcement Security Taskforce (BEST) officers within the Deming AOR.

This Report of Investigation will serve to document the closing for the Blue Campaign Human Trafficking Awareness for FY-2018. A new case will be opened for FY-2019.

REPORTED BY

SPECIAL AGENT

APPROVED BY

SUPERVISORY SPECIAL AGENT

DATE APPROVED

9/18/2018
DETAILS OF INVESTIGATION

At this time all informational and investigative leads have been exhausted for this case for the current fiscal year. A new case will be opened next month for FY-2019.

Case closed
Human Trafficking: What is it and what do we do about it?

Human Trafficking exists, but does it actually occur in Iowa? This training will provide information on how to identify it, strategies for interviewing and investigating, and local resources available to assist with these cases.

Cost: FREE! Register [here](#) by September 7

When: Tuesday, September 18; 8:00am-4:00pm

Where: Sioux City Public Museum

4th Street

Sioux City, Iowa

Target audience is law enforcement; however, any professional working with victims of crime is welcome to attend.

Training hosted and facilitated by:
Victim Assistance Specialist Training Involving Human Trafficking

2017
June 19th
OPLA Attorneys
- Definition of Human trafficking
- Scope
- Difference between Smudging and trafficking
- Laws
- Victim Assistance
- Indicators of Human Trafficking
- How to identify the victim
- Available services/resources
- Immigration remedies (Continued Presence, U-Visa, T-Visa)
- Case Studies

2018
August 6th LV office
- Definition of Human trafficking
- Scope
- Difference between Smudging and trafficking
- Laws
- Victim Assistance
- Indicators of Human Trafficking
- How to identify the victim
- Available services/resources
- Immigration remedies (Continued Presence, U-Visa, T-Visa)
- Case Studies

September 11th:
Head Office Nationwide VAS training (ICE-VAS, HQ staff, DOJ)
- Cultural Competency
- How to work with the victims from various culture
- How to provide effective services to the victims of Human Trafficking, keeping in mind their cultural sensitivities

Sept 13th:
- Human Trafficking/Child Sexual Exploitation Definition
- Sex Tourism – Case Study
- Challenges/success

Oct 23rd VAC training
- ICE victim Assistance Program
- Services
- Role of agent/VAS/VAC
- Available Funding
- Immigration Remedies
FYI on protests tomorrow

Sent with BlackBerry Work
(www.blackberry.com)

Fwd: LookingGlass Cyber Threat Center - 'Family Separation Day Protests' in U.S., on June 30th

Sent from my iPhone

Begin forwarded message:
From: IA.INTELOPS.FOD.HQ <IA.INTELOPS.FOD.HQ@hq.dhs.gov>
Date: June 29, 2018 at 8:45:30 AM EDT
To: IA.INTELOPS.FOD.ALL <IA.INTELOPS.FOD.ALL@hq.dhs.gov>
Cc: IA.INTELOPS.FOD.HQ <IA.INTELOPS.FOD.HQ@hq.dhs.gov>
Subject: FW: LookingGlass Cyber Threat Center - 'Family Separation Day Protests' in U.S., on June 30th

FYSA

From: [REDACTED]
Sent: Thursday, June 28, 2018 12:59 PM
To: LookingGlass Shared Services
Subject: LookingGlass Cyber Threat Center - 'Family Separation Day Protests' in U.S., on June 30th

Good Afternoon,

LookingGlass has compiled a spreadsheet for State Fusion Centers detailing over 600 planned 'Family Separation Day Protests' across the US on June 30. These originated from Cyber Threat Center (CTC) and are broken out by City and State; they provide physical location and the Facebook Event ID.

Kind Regards,

[REDACTED]
Threat Researcher
DHS SCS/LookingGlass Cyber
Reston Office

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LEGAL NOTE: The content in the email is based on analysis for informational purposes only. Content is not offered as and does not constitute legal advice or legal opinion.
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</table>
RACs, quick turnaround, any circumstances where a family unit was separated, and if so, what were the circumstances?

**Tatum would like case examples of each:**

**Topic of the attached:**

**Separating Family Units - Human Smuggling / Human Trafficking**

**Case Examples:**

- **Unclear Family Relationship** - the clearest example is when we are simply unable to confirm the relationship between an adult and child. Smugglers often encourage individuals to destroy their documents prior to entry.

- **Human Smuggling** – When the parent is charged with a serious crime or a felony, such as human smuggling, we would detain the parent in an appropriate, secure detection facility, separate from the child.

- **Human Trafficking** – We also separate a parent and child if we suspect human trafficking. There have been numerous intelligence reports and cases where kids have been used and trafficked by unrelated adults in an effort to avoid detention.

— can you query the RAC's to see if they have anything that fits this
From: [Redacted]
Sent: Monday, April 23, 2018 11:24 AM
To: [Redacted]
Subject: FW: Messaging on FAMU Separation

Assistant Special Agent in Charge
Homeland Security Investigations-Boston
Desk: 617-565-5000
Cell: 617-504-6237
Fax: 617-565-7422

Sent with BlackBerry Work
(www.blackberry.com)

From: [Redacted]
Date: Monday, Apr 23, 2018, 07:34
To: [Redacted]
Subject: FW: Messaging on FAMU Separation

QUICK TURNAROUND – Case Numbers due by Noon – ESs due by COB

Please see attachment and the below.

Operations Manager
Desk: (202) 732-5050
Mobile: (703) 400-8311

Warning: This email and any attachments are UNCLASSIFIED//FOR OFFICIAL USE ONLY (U/FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this email should be furnished to the media, either in written or verbal form. If you are not an intended recipient or believe you have received this communication in error, please do not print, copy, re-transmit, disseminate, or otherwise use this information. Please inform the sender that you received this message in error and delete the original message and all copies from your system.
Subject: FW: Messaging on FAMU Separation

Guys,

Very short turn around info for S1 on a hearing where she is testifying: **1200 today**.

**Tatum would like case examples of each:**

Topic of the attached:

**Separating Family Units - Human Smuggling / Human Trafficking**

Case Examples:

- **Unclear Family Relationship** - the clearest example is when we are simply unable to confirm the relationship between an adult and child. Smugglers often encourage individuals to destroy their documents prior to entry.

- **Human Smuggling** – When the parent is charged with a serious crime or a felony, such as human smuggling, we would detain the parent in an appropriate, secure detection facility, separate from the child.

- **Human Trafficking** – We also separate a parent and child if we suspect human trafficking. There have been numerous intelligence reports and cases where kids have been used and trafficked by unrelated adults in an effort to avoid detention.

If we just get case numbers by noon, that will work and get updated ES by COB. Thanks.

Operations Chief – Ops North
HSI Domestic Operations
202.732.4608 Office
313.850.9702 Cell
**Subject:** Messaging on FAMU Separation

In preparation for S1’s hearing next week, I want to develop a good narrative (supported by facts and cases) on the separating issue. We need to think strategically of the arguments from the other side and position S1 accordingly. Attached is a quick first hit of her public messaging on this topic. Please see my comments and edits in the margins. Please funnel your input back to [REDACTED] – would like to have this wrapped up by Monday COB.
Good Afternoon,

Please let us know your thoughts/comments. The practical exercise is a labor trafficking investigation and we are going to add a sex trafficking scenario in it where you make recorded calls, possible TII, etc. Also, as far as the ILEA training, does DoS have/control the template or do we use a HSI training format?

Thanks!
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APPROVED, (Title of Approving Official)
US Immigration and Customs Enforcement
OFFICE OF TRAINING AND TACTICAL PROGRAMS

ICE Academy

HUMAN SMUGGLING / HUMAN TRAFFICKING INVESTIGATIONS
11800

Lesson Plan

HSI Special Agent Training

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Control Page

Key Contributors

- Jan 2014: Senior Special Agent, Child Exploitation Investigation Unit
- Senior Agent, Child Exploitation Investigation Unit
- Special Agent, ICE Academy, HSI Training Division
- Special Agent, ICE Academy, HSI Training Division
- Senior Instructional Designer, OTTD IMU
- Principal Instructional Designer, OTTD IMU
- Principal Instructional Designer, OTTD IMU
- Oct 2016: Chief, ICEA OPLA Training Division
- Special Agent, ICE Academy, HSI Training Division
- Special Agent, ICE Academy, HSI Training Division
- Principal Instructional Designer, OTTP IMU

ICE Academy Review

- Mar 2017: Interim, Unit Chief, ICE Academy, HSI Training Division

Signature

Office of Training and Development Approval

- Mar 2017: Section Chief, OTTP Instructional Management Unit

Signature

HSISAT: Child Exploitation Investigations Lesson Plan
MARCH 2017
# Control Page

**Key Contributors:**  
- **AUG 2014**  
  - Special Agent, Human Smuggling and Trafficking Unit  
  - Section Chief, Human Smuggling and Human Trafficking Unit  
  - Senior Instructional Designer, Instructional Management Unit  
  - Principal Instructional Designer, OTD IMU

- **MAR 2017**  
  - Chief, ICEA OPLA Training Division  
  - Special Agent, ICE Academy, HSI Training Division  
    - Instructional Designer, OTTP IMU  
  - Principal Instructional Designer, OTTP IMU

- **JUN 2017**  
  - Special Agent, Instructor, ICE Academy, OTTP  
    - Principal Instructional Designer, OTTP IMU

- **JAN 2018**  
  - Principal Instructional Designer, OTTP, IMU

**ICE Academy Review:**  
- **JAN 2018**  
  - Unit Chief, ICE Academy, HSI Training Division

__________

**Signature**

__________

**Office of Training and Tactical Programs Approval:**  
- **JAN 2018**  
  - Section Chief, OTTP Instructional Management Unit

__________

**Signature**

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**HSISAT: Human Smuggling/Human Trafficking Investigations Lesson Plan**  
**JANUARY 2018**  
**Page 2 of 94**  
**2018-ICLI-00046  353**
# Record of Changes

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LESSON DESCRIPTION

I. Lesson Title

Human Smuggling / Human Trafficking Investigations

II. Program/Course Title

HSI Special Agent Training Program

III. Description

This lesson examines the distinctions between human smuggling and human trafficking, how each type of case may be investigated, and the assistance available to victims of human trafficking and other crimes.

IV. Terminal Performance Objective (TPO)

Conditions: Given a set of case-related facts indicating human smuggling or human trafficking,

Behavior: determine investigative and victim-support actions

Criterion: in accordance with legal requirements, agency policy, and agency resources.

V. Enabling Performance Objectives (EPOs)

EPO #1: Explain the elements of human smuggling crimes.
EPO #2: Define human smuggling and related terms and identify indicators to establish violations of human smuggling statutes.
EPO #3: Identify the different methods used by Alien Smuggling Organizations (ASOs) to bring aliens into the U.S., including by land, sea and air, both through the Ports of Entry (POEs) and by crossing the borders at other than POEs.
EPO #4: Determine investigative approaches and actions to investigate human smuggling cases.
EPO #5: Explain the elements of human trafficking crimes; and define the differences between sex trafficking and labor trafficking/forced labor.
EPO #6: Define human trafficking and identify indicators to establish violations of human trafficking statutes.
EPO #7: Identify common methods of operation utilized by human trafficking organizations.
EPO #8: Identify investigative approaches and actions to investigate each type of human trafficking case.
EPO #9: Identify various programs within HSI designated to provide assistance to identified victims of human trafficking.
EPO #10: Handle an alien smuggling load from initial encounter to writing the criminal complaint.
## VI. Length of Lesson

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LESSON ADMINISTRATION

I. Lesson Title

Human Smuggling / Human Trafficking Investigations

II. Risk Management

None

III. Facility Requirements

Standard Academy training room

IV. Transportation Requirements

None

V. Required Staff

One instructor qualified to teach HSI Special Agent training for classroom portion. Additional instructors required to assist with over-the-road demonstration.

VI. Academy-Provided Training Aids and Equipment

- Computer, projector, and screen
- Human Smuggling and Human Trafficking Lesson Plan
- Human Smuggling and Human Trafficking PowerPoint presentation
- White board or flip chart and markers

VII. Student-Provided Equipment

None

VIII. Student Handouts and Materials

- Human Smuggling and Human Trafficking Student Guide
- Student Shared Drive (SDR) HS/HT-1 ICE Trafficking in Persons Strategy (ICE TIPS), May 4, 2007
- Student Share Drive (SDR) HS/HT-3 Definitions of Human Smuggling and Human Trafficking, December 13, 2004
IX. Attachments

- Human Trafficking Indicators, HSI Blue Campaign brochure
- ICE Continued Presence brochure
- Shield America brochure
- Mandatory Tracking Requirements form
- Domestic and International Undercover Alien Smuggling Investigations Approval Guidance Chart
- Traffic Stop Checklist

X. References

- Human Trafficking Indicators, HSI Blue Campaign brochure
- Controlled Delivery of Aliens approval guidance chart
- Performance Based National Detention Standards 2011
- ICE Continued Presence brochure
- USCIS website: I-914, Application for T Nonimmigrant Status
- USCIS website: I-918, Application for U Nonimmigrant Status
- Mandatory Tracking Requirements
- Notice of Request for Continued Presence
- HSI Directive 10075.1 Continued Presence
- Request for Continued Presence
- Request for Extension of Continued Presence
- CBP/ICE Memorandum of Understanding on Controlled Deliveries, Cold Convoys and Pass-Through Operations at Ports of Entry, February 18, 2010
Lesson Plan

Human Smuggling / Human Trafficking Investigations

INTRODUCTION

I. Motivation [OPs]

Human trafficking is a form of modern day slavery. HSI places a priority on human trafficking investigations and recognizes victims of human trafficking as crime victims.

In human smuggling cases individuals participate voluntarily by entering into a contract with alien smuggling organizations in attempting to enter the U.S. illegally.

But often there are areas where these two distinctly different crimes overlap. A person willingly brought to the U.S. as a smuggled alien, only to become subjected to some unwanted obligation, such as the use of force or coercion to collect smuggling fees or when promised employment turns into forced labor or commercial sex.

HSI agents conduct criminal investigations into each type of offense; and understanding the differences, and similarities, is essential.
II. Objectives

A. Terminal Performance Objective (TPO)

Conditions: Given a set of case-related facts indicating human smuggling or human trafficking,

Behavior: determine investigative and victim-support actions

Criterion: in accordance with legal requirements, agency policy, and agency resources.

B. Enabling Performance Objectives (EPOs)

EPO #1: Explain the elements of human smuggling crimes.
EPO #2: Define human smuggling and related terms and identify indicators to establish violations of human smuggling statutes.
EPO #3: Identify the different methods used by Alien Smuggling Organizations (ASOs) to bring aliens into the U.S., including by land, sea and air, both through the Ports of Entry (POEs) and by crossing the borders at other than POEs.
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EPO #8: Identify investigative approaches and actions to investigate each type of human trafficking case.
EPO #9: Identify various programs within HSI designated to provide assistance to identified victims of human trafficking.
EPO #10: Handle an alien smuggling load from initial encounter to writing the criminal complaint.

III. Review of the Past

Human smuggling – The surreptitious entry of people into the U.S., facilitated by a third party, involving individuals willingly traveling to the U.S. in deliberate
evasion of immigration laws. Smuggled aliens are critical to an investigation as material witnesses, possibly requiring testimony in court. They may be placed in a parole status and released into the U.S. for a short period of time. After testimony, witnesses are generally placed in removal proceedings.

**Human trafficking** – The recruitment, harboring, transportation, provision, obtaining, advertising, maintaining, patronizing or soliciting of a person (regardless of citizenship or immigration status), by means of threat or use of force, fraud, or coercion, subjecting victims to involuntary servitude, peonage, debt bondage, or slavery for the purpose of sexual exploitation or forced labor. Victims of trafficking must be protected and may also be witnesses. Trafficking crimes can be transnational or domestic, involving U.S. citizens or foreign national victims. Foreign nationals are eligible for certain types of immigration relief, such as Continued Presence or a T or U visa if they cooperate with the investigation and prosecution.

As you have seen from previous case scenarios and examples, ICE HSI works jointly with many other agencies to ensure our national security and to investigate violations related to federal, state and local crimes. Human smuggling and trafficking is no exception, as our partnerships and work on multi-jurisdictional task forces identify both the perpetrators and victims of these crimes.

Although this lesson is called Human Smuggling and Human Trafficking, it is important to remember that smuggling and trafficking are different offenses.

- Human smuggling is the importation of people willingly traveling into the United States involving deliberate evasion of immigration laws.
- Human trafficking is:

  1) sex trafficking, involving the recruitment, harboring, transportation, provision or obtaining of a person to use for a commercial sex act, induced by force, fraud or coercion, or in which the person induced to perform such act has not attained the age of 18; or
  2) labor trafficking and forced labor involving the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery.

In general terms, smuggling is transportation-based, a crime against the U.S., while trafficking is exploitation-based, a crime against the person.
IV. Advance Organizer of Main Ideas

V. Agenda

The first part of the lesson covers specific topics pertaining to human smuggling:

- Elements of human smuggling crimes and human smuggling investigations
- Definition of human smuggling and indicators of human smuggling violations
- Methods used for human smuggling and investigative approaches
- Demonstrations and examples

The second part of the lesson talks about human trafficking:

- Elements of human trafficking crimes and human trafficking investigations
- Definition of human trafficking and indicators of human trafficking violations
- Methods used for human trafficking and investigative approaches
- Ways SAs can provide appropriate assistance to identified victims
- Handling an alien smuggling load
- Demonstrations and examples

After in-depth discussion of human smuggling and human trafficking crimes and investigations, the instructor will lead a guided demonstration providing students the opportunity to participate and respond to the scenario.

At the end, students will respond to a set of questions in the Student Practice and Practice Scenarios.
INSTRUCTION

I. Explanation

A. EPO #1: Explain the elements of human smuggling crimes.  

   a. **Elements:**

      1) Knowing that a person is an alien
      2) Brings or attempts to bring such person to the United States
      3) At a place other than that designated by the United States (e.g., “through the hills” at a desolate spot along the border where no POE exists).

   b. **Comments:**

      1) The immigration status of the alien who is brought to the United States in violation of 8 U.S.C. § 1324(a)(1)(A)(i) is not an element of proof. However, the alien’s immigration status becomes relevant, as discussed below, with other violations of 8 U.S.C. § 1324 (a)(1)(A).

      2) In order to prosecute the individual who brought the alien to the U.S. at an unauthorized location, the Government need not prove that an adverse action (i.e., Removal) was taken against the alien who was brought to the U.S., nor would such alien’s receipt of relief from removal prevent criminal prosecution of the smuggler.
c. Example: An alien smuggler guides a group of 10 aliens across a wooded and desolate section of the northern border of the U.S.

d. **Penalty** imposed for each alien in respect to whom such a violation occurs is:

1) Less than 10 years and/or fine under title 18, USC; or
2) Less than 20 years and/or fine under title 18, USC, if during and in relation to such violation the person causes serious bodily injury [as defined in 18 U.S.C. § 1365] or places in jeopardy the life of any person; or
3) If the act results in the death of any person, then death, or imprisonment for any term of years or for life, fined under 18, USC or both.


a. **Elements:**

1) Knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law
2) Transports, moves or attempts to transport or move such alien within the United States
3) By means of transportation or otherwise
4) In furtherance of such violation of the law.

b. **Comments:**

1) The immigration status of the alien who is transported is a critical fact. As an element of the offense, the Government must prove that the defendant knew the alien came to, entered, or remained in the U.S. in violation of law, or the defendant acted in reckless disregard of that fact.
2) The transportation must be "in furtherance" of the alien’s coming to, entry, or remaining in the United States in violation of law.

c. Example: In the middle of a hot summer night in Arizona, a motorist driving a van picks up 5 individuals at a remote location on Highway 27, adjacent to the Mexican border, and then heads north. Each individual is wearing torn, soiled, and sweat stained clothing, has a backpack, and carries a milk jug partially filled with water. The van encounters an immigration checkpoint on the trip north. It is directed to secondary inspection so that an agent can
interview the passengers. The five passengers only speak Spanish. One of them tells the agent that all five of them entered the U.S. illegally earlier in the day and that they were instructed to meet a vehicle at mile marker 137 on the first road they reached after crossing the border. The agent is told that each passenger was to pay the van driver $500 in cash for the ride. A consent search of the van reveals $2,500 in cash under the driver’s seat.

d. **Penalty** imposed for each alien in respect to whom such a violation occurs is:

1) <5 years and/or fine under title 18, United States Code; or
2) <10 years and/or fine under title 18, United States Code if done for commercial advantage or private financial gain; or
3) <20 years and/or fine under title 18, United States Code, if during and in relation to such violation the person causes serious bodily injury [as defined in 18 U.S.C. § 1365] or places in jeopardy the life of any person; or
4) If the act results in the death of any person, then death, or imprisonment for any term of years or for life, fined under 18, USC or both.


a. **Elements:**

1) Knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law
2) Conceals, harbors, or shields from detection or attempts to conceal, harbor, or shield from detection such alien
3) In any place, including any building or any means of transportation.

b. **Comments:**

1) The immigration status of the concealed, harbored, or shielded alien is a critical fact. As an element of the offense, the Government must prove that the defendant knew the alien came to, entered, or remained in the U.S. in violation of law, or the defendant acted in reckless disregard of that fact.
2) Most jurisdictions have determined that “harboring” is defined as providing (or offering) a known illegal alien a secure haven, a refuge, a place to stay in which authorities are unlikely to be seeking him. Preventing detection need not be the defendant’s sole purpose, but should be an integral part of the overall scheme. See, United States v. Campbell, 770 F. 3d 556 (7th Cir October 21, 2014).

3) The term “any place” is very broad in scope.

c. Example: In the early hours of a hot summer day in Arizona, five individuals emerge from the brush on Mr. Smith’s cattle ranch, located in a remote area adjacent to the Mexican border. Each individual is wearing torn, soiled, and sweat stained clothing, has a backpack, and carries a milk jug partially filled with water. The five individuals only speak Spanish, though one in broken English tells Mr. Smith that they are tired, need rest, and want water. He also explains that they cannot be seen so need to leave when it is dark. Mr. Smith feeds them and provides an out building as a place of refuge until sundown. This is a violation of 8 U.S.C. § 1324(a)(1)(A)(iii). By contrast, simply putting 50 gallon water barrels out at various places on his 5,000 acre ranch where illegal aliens have been known to perish does not fall under this statute.

d. Penalty imposed for each alien in respect to whom such a violation occurs is:

1) <5 years and/or fine under title 18, United States Code; or
2) <10 years and/or fine under title 18, United States Code if done for commercial advantage or private financial gain; or
3) <20 years and/or fine under title 18, United States Code, if during and in relation to such violation the person causes serious bodily injury [as defined in 18 U.S.C. § 1365] or places in jeopardy the life of any person; or
4) If the act results in the death of any person, then death, or imprisonment for any term of years or for life, fined under 18 USC or both.

a. **Elements:**

1) Encourage or induce an alien to come to, enter, or reside in the United States
2) Knowing, or in reckless disregard of the fact that such coming to, entry, or residence is or will be in violation of law.

b. **Comments:** The immigration status of the alien who is encouraged or induced is a critical fact. As an element of the offense, the Government must prove that the defendant knew or acted in reckless disregard of the fact that the alien's coming to, entry, or residence is or would be in violation of law.

c. **Example:** A person visits Nogales, Sonora, Mexico, and goes to a day laborer center where he tells a group of drywall hangers that he will arrange to get them "good paying" employment on a construction project if they will show up the next day by 8 a.m. and meet him at 123 Main Street, Tucson, Arizona. He gives them the business card of an associate who will take them across the border and transport them to Tucson for a fee. He knows that the construction project superintendent will pay him $300 for each drywall hanger he recruits.

d. **Penalty** imposed for each alien in respect to whom such a violation occurs is:

1) <5 years and/or fine under title 18, United States Code; or
2) <10 years and/or fine under title 18, United States Code if done for commercial advantage or private financial gain; or
3) <20 years and/or fine under title 18, United States Code, if during and in relation to such violation the person causes serious bodily injury [as defined in 18 U.S.C. § 1365] or places in jeopardy the life of any person; or
4) If the act results in the death of any person, then death, or imprisonment for any term of years or for life, fined under 18 USC or both.

   a. Any person who engages in any conspiracy to commit a violation of 8 U.S.C. §1324(a) (1)(A)(i) thru (iv), or
   


c. **Penalty** imposed for each alien in respect to whom such a violation occurs is:

1) **Aids or Abets** – <5 years and/or fine under title 18, United States Code; or
2) **Conspiracy** – <10 years and/or fine under title 18, United States Code. [Note that this is double the penalty for the general Federal crime of conspiracy, 18 U.S.C. § 371, so the alien smuggling conspiracy charge should be used when applicable.]; or
3) **Conspiracy and Aids or Abets** – <20 years and/or fine under title 18, United States Code, if during and in relation to such violation the person causes serious bodily injury [as defined in 18 U.S.C. § 1365] or places in jeopardy the life of any person; or
4) **Conspiracy and Aids or Abets** – If the act results in the death of any person, then death, or imprisonment for any term of years or for life, fined under title 18, United States Code, or both.

6. **8 U.S.C. § 1324 (a)(2)** – Bringing or attempting to bring an alien to the United States knowing or in reckless disregard of the fact that the alien has not received prior official authorization to come to, enter, or reside in the United States.

a. Elements:

1) Knowing or in reckless disregard of the fact that an alien has not received prior official authorization to come to, enter, or reside in the United States
2) Brings, or attempts to bring such alien to the United States in any manner whatsoever.

b. Comments: As with 8 U.S.C. § 1324 (a)(1)(A)(i), in order to prosecute the individual who brought or attempted to bring the alien to the U.S., the Government need not prove that an adverse action (i.e., Removal) was taken against the alien, nor would such alien’s receipt of relief from removal prevent criminal prosecution of the smuggler.
c. Example: Mr. Smith has a Cadillac Escalade with hidden compartments. He is able to hide a person behind the dashboard and two additional people in a modified gas tank. He drives down to Tijuana, Mexico looking to make some money. He encounters 3 Mexican citizens who pay him $300 a piece to take them to Los Angeles. He hides the aliens in his Escalade and proceeds north to the POE. While attempting to enter the U.S., Mr. Smith appears nervous, is sweating profusely, and makes some inconsistent statements about the reason(s) he visited Mexico. He is referred to secondary for additional questioning. Officers discover the 3 persons hidden in the Escalade. Mr. Smith is arrested and charged with alien smuggling.

d. **Penalty** imposed for each alien in respect to whom such a violation occurs is:

1. <1 years and/or fine under title 18, United States Code; or
2. Where the offense is committed with the intent or reason to believe the alien will commit an offense against the U.S. or any state punishable by imprisonment of greater than 1 year, the result will be: fined under title 18, United States Code, and imprisonment (1st or 2nd violation = 3 to 10 years; 3rd or more violation = 5 to 15 years) or both; or
3. Where the offense is done for the purpose of commercial advantage or private financial gain, the result will be: fined under title 18, United States Code, and imprisonment (1st or 2nd violation = 3 to 10 years; 3rd or more violation = 5 to 15 years) or both; or
4. An offense in which the alien is not upon arrival immediately brought and presented to an appropriate immigration officer at a designated POE, the result will be: fined under title 18, United States Code, and imprisonment (1st or 2nd violation = <10 years; 3rd or more violation = 5 to 15 years) or both.

7. **8 U.S.C. § 1327** – Aiding or assisting certain aliens to enter the United States.
a. Elements:

1) Knowingly aids or assists any alien inadmissible under
   a) INA § 212(a)(2) convicted of an aggravated felony or
   b) INA § 212(a)(3) security and related grounds, other than subparagraph (E) thereof

2) To enter the United States or

3) Connives or conspires with any person or persons to allow, procure or permit any such alien to enter the United States.

b. Penalty: <10 years and/or fine.

c. Example: Mr. Flores-Garcia has admitted aiding and assisting an undocumented alien named Gabriel Hernandez to enter the United States. Flores-Garcia also admits that, as an undocumented alien, he knew Gabriel Hernandez was inadmissible to the United States. Flores-Garcia asserts, however, a complete lack of knowledge concerning the Flores-Garcia's criminal record and the government concedes that it cannot prove otherwise.

Hernandez had in fact been previously been convicted of possession of a narcotic substance for sale, an aggravated felony [See, INA § 101(a)(43)(B)], making him "inadmissible" to the United States. INA § 212(a)(2) states in relevant part: "any alien convicted of . a violation of (or a conspiracy or attempt to violate) any law or regulation of a State, the United States, or a foreign country relating to a controlled substance (as defined in section 802 of Title 21), is inadmissible."

The government assumes the burden to prove that: 1) Flores-Garcia knowingly aided or assisted an alien to enter the United States; 2) Flores-Garcia knew that the alien was inadmissible to the United States; and 3) the alien was inadmissible under INA § 212(a)(2) insofar as being an alien inadmissible under such section has been convicted of an aggravated felony. Proof that the defendant knew of alien's prior conviction or inadmissibility under INA § 212(a)(2) is not required. U.S. v. Flores-Garcia, 198 F.3d 1119 C.A.9 (Cal.) 2000.

a. Elements:

1) Whoever directly or indirectly,

   a) Imports or attempts to import into the United States
   b) Holds or attempts to hold any alien for any such purpose in pursuance of such illegal importation or
   c) Keeps, maintains, controls, supports, employs, or harbors in any house or other place

2) Any alien

3) For the purpose of prostitution or for any other immoral purpose

b. Comments: The phrase “immoral purpose” has not been defined, but is generally accepted by courts to mean prostitution or a role as a concubine (sexually subservient mistress). The trial and punishment of offenses under this section may be in any district to or into which such alien is brought in pursuance of importation by the person or persons accused, or in any district in which a violation of any of the provisions of this section occurs. In all prosecutions under this section, the testimony of a husband or wife shall be admissible and competent evidence against each other.

c. Penalty: <10 years and/or fine.

d. Example: James Clark, a Lubbock, Texas minister, met Carolyne Njau in August 2005 while on a trip to Kenya. Clark approached Njau, who was a prostitute at the time, in a hotel coffee shop. Clark falsely claimed to be a Texas Tech University professor and a minister. After chatting with Njau, Clark invited her to his hotel room on the pretense of continuing their conversation. There, he touched her, and he had her pose while he took a picture of her genitals.

   In November 2005, Clark returned to Texas, promising Njau that his church might sponsor her education in the United States. When Njau informed Clark that she would be unable to afford her airfare, he agreed to pay it but suggested that she could pay him back by “serv[ing]” his friends, which she “took . . . to imply sexual services in return for money.”
Upon her arrival in the United States in January 2006, Clark controlled, threatened, and sexually assaulted Njau. Ultimately, Njau confided in a school administrator, who contacted authorities. Clark was prosecuted and convicted for importation of an alien for prostitution or other immoral purposes. U.S. v. Clark, 582 F.3d 607 (C.A.5 Tex. 2009).

   
   a. **Elements:**
      
      1) During any 12-month period
      2) Knowingly hires for employment
      3) At least 10 individuals
      4) With actual knowledge that the individuals are both
         
         a) Unauthorized aliens [as defined in INA § 274A(h)(3)] and
         
         b) Were also brought into the United States in violation of 8 U.S.C. § 1324(a).
      
   b. **Penalty is <5 years and/or fine.**
   c. **Example:** Mr. Fred Farmer needs workers during his apple harvest season, but due to his recent financial difficulties he cannot afford to pay the going rate demanded by apple pickers who have work authorization. He contacts Jim, a person known to be involved with alien smuggling, and asks if he is aware of any “illegals” willing to “work for cheap.” A week later Jim contacts Fred, tells him he has just smuggled a brand new group of aliens “thru the hills,” and asks how many workers he needs. Fred responds, “I’ll take as many as you can give me. My crop is ripe and needs picking now!” Two days later, Jim arrives at Fred’s with 15 of these same illegal aliens in a van and tells Fred, “You are just dam lucky I just smuggled this new load in from Mexico and I am offering them to you first. I expect a little more than my usual price.” Fred looks them over and then hires all 15 of the illegal aliens to pick apples. Jim walks away with a fat finder’s fee in his wallet.

   
   a. **Elements:**
      
      1) It is unlawful for a person or other entity to hire, or to recruit, or refer for a fee, for employment in the United States any alien.
2) Knowing the alien is an unauthorized alien (as defined in 8 U.S.C. § 1324a(h)(3)) with respect to such employment.

b. Comments: The term "unauthorized alien" means, with respect to the employment of an alien at a particular time, that the alien is not at that time either an alien lawfully admitted for permanent residence (LPR), or an alien authorized to be so employed by law or the Secretary of Homeland Security (previously the Attorney General).

c. Example: Mr. Steve Jones owns a company bagging sawdust and other landscaping materials. Business is booming and Steve needs help in the business office. Steve hires his best friend Alex as an accountant. In completing the I-9 Employment Eligibility Verification Form, Alex asserts he is a U.S. citizen and supplies "proof" of such attached to the form. Steve knows that Alex is a native and citizen of South Africa, and was admitted to the U.S. as a B-2 pleasure visitor, overstayed his period of authorized stay, and remains in the U.S. in violation of law. Steve values his friendship with Alex so he "looks the other way" and breaks the law.

d. **Penalty** imposed for such a violation is:

1) **Criminal Penalty** – For engaging in a pattern or practice of violations a person shall be fined not more than $3,000 for each unauthorized alien with respect to whom such a violation occurs, imprisoned <6 months for the entire pattern or practice, or both, notwithstanding the provisions of any other Federal law relating to fine levels.

2) The statute also provides for civil fines for such violations as well as for other violations involving hiring persons without performing background checks.


1) A non-immigrant pleasure visa holder cannot be convicted of 1324(a)(3), but can be convicted of 1324a because, although lawfully present, such an alien is not allowed to work while in the United States on such a visa.

   a. **Elements:**
      
      1) Knowingly establishes a commercial enterprise
      2) For the purpose of evading any provision of the immigration laws.

   b. **Penalty:** <5 years and/or fine.

   c. **Example:** Mr. Matsumaru is a licensed attorney who practices law in Hawaii. Matsumaru helps Japanese clients obtain visas from the United States government. He brags that he has almost a 100% success rate in securing visas for his clients. Matsumaru's success rate is a function of an elaborate, multi-faceted strategy devised to defraud the United States government, and at the same time, to swindle his unwitting foreign clients. First, Matsumaru advertises in a Japanese language publication as a bilingual immigration attorney capable of helping Japanese citizens obtain visas from the United States Department of State ("State Department"). Japanese citizens desirous of living in the United States who see Matsumaru's advertisement contact him. Matsumaru explains that in order to qualify for a particular visa [E-2 – Treaty Investor], a Japanese citizen must invest a substantial sum of money in a United States company.

   To effectuate the investment, Matsumaru instructs the Japanese citizens to wire money from their Japanese bank accounts to newly formed corporate bank accounts in Hawaii. Instead of using these funds to invest in United States companies, however, Matsumaru, without authorization, diverts most of the money to his own personal uses. Then, after creating the paper trail supposedly demonstrating his clients' investments in viable United States companies, Matsumaru endeavors to secure visas for his clients. He prepares application materials for his clients to submit to the United States consulate in Japan. In these materials, Matsumaru makes several false representations to the United States government about the history of his clients' investments and about the formation
of their United States enterprises. Relying on these false representations, the government has granted visas to Matsumaru’s clients. U.S. v. Matsumaru, 244 F.3d 1092 C.A.9 (Hw) 2001.

12. 8 U.S.C. § 1325(c) – Marriage fraud.
   a. Elements:
      1) Knowingly enters into a marriage
      2) For the purpose of evading any provision of the immigration laws.
   b. Penalty: <5 years and/or <$250,000 fine.

   a. Elements
      1) Any alien who
         a) enters or attempts to enter the United States at any time or place other than as designated by immigration officers, or
         b) eludes examination or inspection by immigration officers, or
         c) attempts to enter or obtains entry to the United States by a willfully false or misleading representation or the willful concealment of a material fact.
   b. Examples:
      1) Improper time or place: Mario Sanchez is a native and citizen of Mexico who climbs a border fence at the Mexican border, hops over, and runs north into Texas. He has entered the United States at a place other than as designated by immigration officer in violation of 8 U.S.C. § 1325(a)(1).
      2) Eludes inspection: Mario Sanchez is a native and citizen of Mexico who enters the U.S. in a car’s trunk or in a secret compartment in the car. He is never discovered by CBP officers at the POE and has therefore eluded examination and inspection in violation of 8 U.S.C. § 1325(a)(2).
Willfully false or misleading: Mario Sanchez is a native and citizen of Mexico who entered the U.S. "through the hills" as an infant in his illegal parent's arms and was schooled here for 20+ years. He is returning from a trip to Mexico after attending his grandmother's funeral. He has never gained any lawful immigration status in the U.S. He arrives at a land POE. He speaks perfect English, has a California driver's license, and a student identification and library card from Los Angeles Community College. He presents a rather tattered birth certificate from California and claims to be a USC. The CBP officer senses something is not right and refers Mario to secondary inspections. There, after questioning, Mario admits his true nativity and citizenship. Mario attempted to enter the United States by a willfully false representation in violation of 8 U.S.C. § 1325(a)(3).

c. Criminal penalty imposed for such a violation is:

1) 1st Conviction – <6 months and/or fine under title 18, United States Code
2) Subsequent Convictions – <2 years and/or fine under title 18, United States Code
3) Civil Penalties exist under [8 U.S.C. § 1325(b)] and are in addition to and not in lieu of any criminal or other civil penalties that may be imposed. Civil Penalties under [8 U.S.C. § 1325(b)] include:

   a) $50 to $250 for each entry if not previously subject to a civil penalty under 8 U.S.C. § 1325(b)
   b) $100 to $500 for each entry where the alien has been previously subject to a civil penalty under 8 U.S.C. § 1325(b)


   a. Any alien who (1) has been denied admission, excluded, deported, or removed, or has departed the United States while an order of exclusion, deportation, or removal is outstanding, and thereafter; (2) enters, attempts to enter, or is at any time found in, the United States unless:

      1) Prior to embarkation outside of U.S. or application for admission from a foreign contiguous territory, the Attorney General expressly consent to alien's reapplying for admission; or
2) With respect to an alien previously denied admission and removed, such alien establishes he was not required to obtain advanced consent under the law.

b. Example: Mr. Pina-Jaime was born in Mexico and is not a United States citizen. He was deported from the United States 4 times, but the Immigration and Naturalization Service ("INS") gave him special permission to enter for one day so that he could attend a child custody hearing for his daughter. The INS explicitly "warned" Pina-Jaime, in writing, that he was "authorized to stay in the U.S. only" for the day of September 17, 1997, and that "[t]o remain past this date, without permission from immigration authorities, is a violation of the law." In spite of this, Pina-Jaime voluntarily chose to remain in the United States, and did not return to Mexico. His parole automatically terminated.

On February 15, 2000, the INS learned that Pina-Jaime was still in this country. He was charged with being a deported alien found in the United States. He contended that he did not violate 8 U.S.C. § 1326(a)(2) because he had the Attorney General's consent to enter the United States on September 17, 1997, and he did not enter the country illegally.

The court concluded that the government satisfied its burden in this case by proving that Pina-Jaime knowingly and willfully committed the act of staying in the United States without permission of the Attorney General following his one-day parole into this country. **U.S. v. Pina-Jaime, 332 F.3d 609 C.A.9 (Cal.) 2003.**

c. **Penalties:** There are numerous different possibilities.

1) The statute calls for imprisonment of various terms and fines which are in most instances imposed under title 18, United States Code.

2) In most cases the statute calls for imprisonment and/or fine, while in one case the statute mandates fine and imprisonment.

3) Generally speaking, the punishment is dependent upon the alien's criminal record prior to such removal or upon the underlying basis for the removal action.
Demonstration/Examples:

Frank Jones owns and operates a large ranch in west Texas. In March, he traveled to Nuevo Laredo, Mexico and displayed several posters on poles throughout the city that said the following, "Ranch hands needed. If you can get to my ranch by April, you will be hired making $6 per hour, no questions asked. Call this number..." Javier and Mateo did not have the proper documentation to enter the U.S. so they each paid $500 to Jose and Tom to get them across the border into Texas. Jose and Tom hid Javier and Mateo in secret compartments of a milk truck and crossed into the U.S. at the Laredo, Texas POE. After successfully making it into Texas, Javier and Mateo made their way to Frank Jones’ ranch. Without requesting any documentation from Javier and Mateo, Jones hired both.

a. Did Jones commit any crime(s) and, if so, which crime(s)?

**Answer:** Yes, Alien Smuggling, 8 U.S.C. § 1324(a)(1)(A)(iv) – encouraging or inducing aliens to come into the U.S. to reside illegally.

b. Did Jose and Tom commit any crime(s) and, if so, which crime(s)?

**Answer:** Yes, Alien Smuggling 8 U.S.C. § 1324(a)(2) – bringing in an unauthorized alien at a POE. Conspiracy, as well.

c. Did Javier and Mateo commit any crime(s) and, if so, which crime(s)?

**Answer:** Yes, 8 U.S.C. § 1325 – improper entry of alien.

Assume that Jose and Tom took Javier and Mateo to a “safe house” (managed by Mike) to lay low for a while. After a week, Mike instructed Hank to drive Javier and Mateo to the Jones ranch so they could get the job promised on the posters.

d. Did Mike commit any crime(s) and, if so, which crime(s)?

**Answer:** Yes, Alien Smuggling 8 U.S.C. § 1324(a)(1)(A)(iii) – harboring, concealing illegal aliens in the U.S.

e. Did Hank commit any crime(s) and, if so, which crime(s)?

**Answer:** Yes, Alien Smuggling 8 U.S.C. § 1324(a)(1)(A)(ii) – transporting illegal aliens within the U.S.
B. EPO #2: Define human smuggling and related terms and identify indicators to establish violations of human smuggling statutes.

1. Definition of human smuggling

a. The surreptitious entry of people into the U.S., facilitated by a third party, involving individuals willingly traveling to the U.S., in deliberate evasion of immigration laws.

b. Smuggling may be motivated by profit, religion, politics, or family interest.

c. Statutes governing this offense are contained within 8 USC § 1324.

d. Human smuggling related terms:

1) **ASO**: Acronym for alien smuggling organization, a criminal group that works together for the purpose of smuggling or trafficking aliens into the U.S. from abroad.

2) **Pollo**: Spanish for “chicken,” a southwest border slang term for a smuggled alien.

3) **Coyote or pollero**: Southwest border slang for an alien smuggler.

4) **Guide**: Person who guides aliens across the border and shows them the way to the pickup or “load” vehicle or stash house.

5) **Driver**: Also known as the “load driver” – Driver of load vehicle who takes aliens to stash house from the vicinity of the border or from stash house further into interior of the U.S.

6) **Pollo list**: A ledger of the smuggled aliens in a load or who owe the smugglers money on their smuggling fee.

7) **Bajadores**: Southwest border slang term for bandits or “rip off crews” who steal aliens from other smugglers.

8) **Drop house or stash house**: The location where alien smugglers harbor aliens while awaiting receipt of smuggling fees or onward transportation of the aliens to their next or final destination.

9) **Pocket trash**: Pieces of paper containing writing, receipts or other evidence of travel, contact numbers and addresses containing information or intelligence value found in the wallets of smugglers or smuggled aliens.

10) **Material witnesses**: Aliens or other subjects that become witnesses and are willing to provide
information or testimony against alien smuggling organizations and/or their members.

11) **OTM**: Abbreviation for “other than Mexican,” referring to other foreign nationals who cannot be voluntarily returned to Mexico.

12) **Snakehead**: A member of a Chinese alien smuggling organization.

13) **Load**: Group of smuggled aliens when they are in the process of being transported into or through the U.S.

14) **Load vehicle**: Vehicle used to transport aliens from a pickup site inside U.S. borders on to a stash house or to their further destination in the U.S.

15) **Sponsor**: Relative or friend of smuggled alien responsible for paying the smuggled alien’s transportation/smuggling fees.

16) **Reporting party**: Family member or friend of a smuggled alien who contacts law enforcement, usually to report that a relative is being held hostage by smugglers.

2. Investigatory leads may come from:

   a. Information developed through working with local law enforcement
   b. Statements of aliens revealing they were smuggled
   c. Referrals from DHS entities upon the discovery of smuggled aliens
   d. Informants and tipsters
   e. Other ICE investigations or enforcement activities
   f. Non-governmental organizations (NGOs) and advocacy groups

   1) Key source because of their work in the community and ability to build trust
   2) Can help to identify and aid victims who often fear any contact with authorities
   3) HQ and local HSI offices conduct outreach programs to establish relationships with NGOs to identify and aid victims and prosecute violators

   g. Relatives or associates of aliens or victims familiar with smuggling.

3. Indicators of human smuggling

   a. Is the subject in possession of identification and travel documents? If not, who has control of them?
b. Was the subject coached on what to say to law enforcement and immigration officials?
c. Is the subject's salary being garnished to pay off a smuggling fee?

1) Paying off a smuggling fee alone is not considered trafficking.

d. Does the subject have freedom of movement?
e. Has the subject or family been threatened with harm if the subject or family refuses to pay smuggling fees?
f. Has the subject been threatened with deportation or law enforcement action?
g. Can the subject freely contact friends or family?
h. Is the subject in possession of pocket trash with contact names, phone numbers or locations, or used bus and/or plane tickets indicating travel from points south to Mexican border city?

4. Investigation, prosecutorial focus, and penalties

a. Investigations focused on identifying and disrupting criminal organizations involved in bringing in, transporting, and harboring illegal aliens.
b. Sentencing range can vary greatly, based upon numerous factors, such as the number of aliens being smuggled, whether the smugglers are repeat offenders or if crime results in severe injury or death to a smuggled alien.

C. EPO #3: Identify the different methods used by Alien Smuggling Organizations (ASOs) to bring aliens into the U.S., including by land, sea and air, both through the Ports of Entry (POEs) and by crossing the borders at other than POEs.

1. Methods of operation:

a. Components of human smuggling organization:

1) Organizational heads or bosses

a) Oversees the entire alien smuggling operation
b) Typically reside outside the U.S.

2) Arrangers/recruiters
a) Typically reside outside of the U.S.
b) Seek/gather alien clients for the ASO.
c) May require prepayment of part or all of smuggling fees
d) May be independent contractors or may work exclusively for one smuggling organization
e) May travel to source country or be in source country and utilize their local business or residence to receive prospective travelers. Then arrange transport of human merchandise to the U.S. May also be found waiting at transportation hubs such as bus stations or airports to recruit aliens for the ASO.

3) Guides

a) Typically work along the border
b) Lead groups of illegal aliens across to a pre-arranged location to await pickup, or stash/drop houses.
c) Maintain contact with drivers and stash house operators by cell phone to coordinate movements and pickups.

4) Drivers (short-range and long-range)

a) Coordinate delivery of illegal aliens from the immediate border area to stash houses further into the U.S.
b) Transport illegal aliens by car, van, bus, or tractor trailer
c) Frequently used to deliver illegal aliens to final destinations "over the road" to major cities throughout the U.S., or to other transportation hubs for onward travel into the U.S.
d) May be sub-contractor or employed directly by the ASO

5) Facilitators

a) Perform tasks involving contact with public officials or legitimate businesses that require immigration status and/or a clean police record.
b) Rent drop houses or vehicles in U.S. for use by ASO.
c) Obtain cell phones for organization members.
d) Most have legal status in U.S. and many are females.
e) Recover seized vehicles from impound lots.
f) Transport funds to organization members in jail and act as secure communication link.

6) Stash or drop house operation

a) Maintains drop houses in foreign countries, in cities along U.S. border and interior cities
b) Maintains/detains illegal aliens in U.S. temporarily pending receipt of smuggling fees, normally 3-5 days
c) Works with money collectors to coordinate receipt of smuggling fees
d) After smuggling fees are paid, ASO arranges to transport the aliens to their final destination in the U.S., and the stash house operator maintains aliens pending onward transportation into the U.S. interior.

7) Enforcers

a) Used to prevent aliens from leaving the drop house prior to the payment of smuggling fees and to prevent rip off crews from kidnapping aliens and holding them at an undisclosed location for ransom.
b) Usually possess firearms or other weapons (such as baseball bats or machetes) to intimidate the aliens. Most enforcers will use violence to prevent aliens fleeing.
c) Stay in drop house while aliens are present.

8) Money collectors (U.S. and Mexico)

a) Work with drop house operators to coordinate payment of smuggling fees.
b) Collections commonly handled through money transmitters like Western Union, Transfast, or by electronic fund transfer into nominee bank accounts.
c) Usually trusted members of the organization and can be the drop house operators or mid-level managers.
b. Southern border smuggling

1) Source countries using Mexico to enter U.S.
   a) Nationals of many countries are smuggled over land border between U.S. and Mexico – not just Mexicans or other nationals from Central/South America.
   b) Nationals from Asia, Africa, the Middle East, Eastern Europe, and the Balkans may arrive in Central or South America and then travel through Mexico to the U.S.

2) Mexico, the final staging country
   a) Global smuggling groups may utilize Mexican-based smuggling organizations to cross their aliens over the U.S./Mexican land border.
   b) ASOs often have members from different nationalities who handle local coordination with Mexican smuggling organizations.

   (1) Example: a Chinese ASO may have a Chinese employee who works with a local Mexican smuggling organization to bring Chinese aliens into Mexico from Guatemala and escort them to the US. border, where they are handed off to another Mexican ASO to be smuggled into the U.S.

3) Mexican ASO Methods of Operation
   a) Boss uses recruiters, guides, drivers, drop house operators, facilitators, enforcers and money collectors to run smuggling operation.
   b) Boss may obtain aliens from his recruiter or may purchase aliens from subcontractor recruiters.
   c) Once groups of aliens are ready to cross, guides are assigned to each group. Guides then lead aliens across the border by various means including: trains, swimming across rivers or canals, using hidden compartments in vehicles and crossing...
4) Hostage-taking investigations

a) Alien loads in drop houses sometimes targeted for kidnappings by rip off crews or “bajadores” - criminals who are either hostile alien smugglers or gang members who hold ASOs’ alien load hostage, and then extort money from illegal aliens by force or intimidation through use of threats of physical abuse, rape, torture, etc.

b) Hostage takers usually increase smuggling fees well beyond previously agreed figure and notify the alien’s sponsor that alien will suffer if additional fees not paid.

c) HSI usually discovers these cases because HSI duty agents will receive a call from a local police department or alien’s relative stating that alien is being held against his/her will in another state.

d) HSI agents should arrange face-to-face interview of reporting party.

e) Contact duty agent for HSI office with responsibility for the area where victim is being held.
f) Consensually monitored phone calls needed to establish “proof of life” and threats if smuggling fees are not paid.

g) Responsible SAC office attempts to locate victim using technology, very often with assistance of telecom companies.

h) Once victim’s location is determined, responsible office uses SWAT or SRT to take down stash house or other location and rescue victim.

c. Northern border smuggling

1) Source countries using Canada to enter the U.S.

a) Aliens from numerous countries will use the Canadian land border to enter the U.S.

b) Canada is more popular for aliens originating outside the Western hemisphere, such as Koreans, Indians, Chinese, etc. because of Canada’s lax immigration and visitation rules, but is also used by Central and South Americans.

c) As of Dec. 1, 2016, Mexican nationals also require no visa for entry into Canada.

2) Methods of operation

a) Smugglers operating within Canada are usually non-Canadian born, but are often “landed immigrants,” a Canadian equivalent of a Lawful Permanent Resident, or naturalized Canadian citizens of the same nationality/ethnic background as the aliens being smuggled.

b) Aliens usually contact recruiters in source country.

c) Recruiters arrange for transport to Canada as tourists requiring no visa, or through the use of fraudulent documents, either singly or in small groups, to avoid arousing suspicion.

d) Illegal aliens are placed into drop houses on the Canadian side, then guided across the border in small groups of 2 to 12 aliens.

(1) Smugglers often utilize territory controlled by Native Americans, whose reservation land often
crosses the international boundaries, requiring no formal inspection by either U.S. or Canadian authorities.

(2) This aids in the ease of movement of humans and other contraband.

e) Once illegal aliens are guided across the border, they are picked up by drivers and driven to their final destination or transported to airports for flights to their final destination.

(1) These organizations do not always use stash houses in the U.S.

f) Most smuggled aliens who cross the Northern border either pay their smuggling fees prior to starting their trip, or are known to the smugglers, and therefore the ASO normally does not hold them until smuggling fees are paid.

d. Air smuggling methods of operation

1) Most air smuggling is done using commercial airlines entering at international airports.

a) Private plane smuggling is relatively rare.

2) Smugglers secure travel documents through fraudulent visa applications or use of photo-subbed or counterfeit passports.

3) Smugglers also use legitimate passports carried by imposters.

4) Air smuggling usually involves multiple routes through multiple countries to utilize local smuggling networks. This can lengthen the journey from a few days to months.

5) Smuggling routes vary by nationality and the ASO's previous successes moving aliens along various routes.

6) Land border smuggling of nationals from outside Central and South America nearly always required smuggling by air for a portion of the route.

7) Aliens use either genuine or counterfeit passports, depending on the countries they are flying into.

a) Aliens sometimes use more than one passport along the route.
8) Smugglers often secure cooperation of corrupt foreign officials to facilitate alien’s entry into transit countries and sometimes to gain legitimate travel documents obtained by fraud or corruption. Many transit countries have little or no visa restrictions for entry or transit.

9) The aliens are often moved in smaller, fragmented groups to avoid notice, though loads may actually consist of up to 20 people.

10) Aliens will sometimes pose as students, tour groups, etc., to more easily facilitate entry into transit countries.

11) The increase in scrutiny by visa issuance posts overseas, combined with stepped up enforcement and advanced passenger technology by CBP, has made air smuggling directly into the U.S. much more difficult and thus much more expensive for aliens willing to travel.

e. Marine smuggling

1) Open boat smuggling

a) Used by various ASOs to bring aliens from numerous source countries.

b) In the Atlantic and Caribbean, the primary source countries are Cuba, the Bahamas, and the Dominican Republic.

(1) The Bahamas are a favorite launching point for many transnational smuggling organizations, due to their close proximity to the Florida coastline.

(2) On the west coast, Mexican ASOs routinely run open boats from areas along the Mexican coast, up the California coastline to bring in the aliens.

c) Methods of operation

(1) Large scale smuggling ship operations had previously been successful in bringing Chinese nationals to the U.S. coastline and utilized open “go fast” type smaller boats to drop them off at shore. Due
to increases in maritime security, large smuggling ship operations have become extremely rare.

(2) Cubans, Dominicans and Haitians will often attempt to leave their home country and arrive in the U.S. by open boats much smaller than commercial-type vessels, some arriving in what amount to little more than rafts.

(a) ASOs usually use larger boats, but many are still lost at sea.

(3) Previously under U.S. law, Cuban nationals who reached U.S. shores were eligible to apply for political asylum; those interdicted at sea could be returned to Cuba – wet foot dry foot policy.

(a) This policy ended in 2016.
(b) Cubans are still eligible to apply for asylum under the Cuban Adjustment Act.

2) Container smuggling

a) This method is rarely or no longer observed at U.S. ports due to increased security and overseas cargo container screening by CBP.

b) It is still a favorite method utilized by ASOs in other ports around the world – with containers being loaded in high risk ports in Africa and Asia for shipping to ports in Europe.

c) Aliens and survival supplies are loaded into containers at off-site warehouses.

(1) Supplies: Food, water, bodily waste containers, batteries, tools to facilitate escape from container upon arrival in U.S.
D. EPO #4: Determine investigative approaches and actions to investigate human smuggling cases.

1. Investigative approach for container or stowaway smuggling
   a. Interview and search aliens.
   b. Search ship and interview crew members and captain.
   c. Work with CBP and local authorities to search port for co-conspirators.
   d. Obtain and review shipping documents.
   e. Search container for evidence.

2. Investigative approach for alien smuggling investigations
   a. When vehicle suspected of smuggling aliens is stopped:
      1) Determine reason for vehicle stop from local law enforcement.
      2) Separate everyone in vehicle to interview individually.
      3) Driver is not necessarily in control – smuggler(s) may be sitting in back to blend in with smuggled aliens.
      4) Conduct records checks on all subjects to obtain any prior criminal or immigration history.
      5) Search each person and search for indicators such as unusual amounts of cash, documents, or other indicators of their role as the smuggler (such as pocket trash, pollo list).
      6) Compare statements for corroboration, and to identify who is most likely to cooperate. Depending on the AOR, determine the possibility of conducting a controlled delivery of the aliens in accordance with policy.
b. Interview smuggled aliens to determine potential for use as material witness.

1) Conduct follow-up interviews to determine:
   a) If they can testify to the elements of the crime and ability to identify the principals
   b) Level of information
   c) Level of cooperation
   d) Credibility to prosecutor and jury

2) If witness must be detained, first consider initial immigration detention; then coordinate with AUSA to seek a federal material witness warrant if the witness must be detained during prosecution phase.

c. Interview techniques with suspects, witnesses, and victims must be appropriate to each individual's situation.

d. When drop/stash house is suspected of smuggling/harboring aliens

1) Determine who owns or leases location
   a) Utility bills, cable TV bills or correspondence may help establish ownership of residence.

2) Look for house trash or notebooks containing ledgers or pollo lists indicating dates, times, amounts that may indicate transport of aliens and payments. Also look for copies of money remittance receipts from Western Union or others, showing recipient's name and sender's name (often this is the sponsor).

3) Obtain consent to cellbrite phones in possession of subjects. If entry to stash house was done via search warrant, make sure to include cellphones within scope of items in warrant.

e. Document interviews for criminal charges following procedures for taking sworn statement.

1) Provide Miranda warnings for criminal charges to suspected house caretakers.
2) Keep criminal investigation information contained in criminal investigation reports, ROI for ICM, SEACATS incident reports, etc.
   a) Alien processing documents are not recommended for memorializing statements concerning criminal activity.

f) Comply with HSI procedures for seizing and documenting evidence: legal authority, chain of custody, authority to seize, transport procedures, documenting in ICM (DHS Form 6051S).

1) Coordinate with local seized property specialist.

3. Undercover operations involving controlled delivery (transportation and release) of undocumented aliens (UDAs)
   a) Purpose is to assist in identifying and dismantling extraterritorial criminal targets (ECT) and their organizations.
      1) May be conducted only with approval per HSI policy, March 23, 2012.
   b) Most common method is transport by air, utilizing UCA and HSI provided documents used for entry at a U.S. Port of Entry.
   c) Coordinate with CBP in accordance with CBP/ICE Memorandum of Understanding on Controlled Deliveries, Cold Convoys and Pass-Through Operations at Ports of Entry, February 18, 2010.
   d) Alien transport operation procedures include:
      1) SAC authorization for reasonable number of UDAs in consultation with local U.S. Attorney’s Office
      2) Safety is paramount
         a) Any UDAs in physical distress or danger should be removed as soon as practical.
         b) Transport in manner that minimizes risk to all participants.
         c) Use of maritime components is rare and requires additional approval.
      3) Appropriate surveillance throughout operation
      4) Coordination with HSI Attaché is required for any undercover activities in foreign country
5) USAOs in affected areas must approve investigations involving release of UDAs
6) No aliens from special interest countries or criminal aliens transported internationally or released without specific approvals
7) SAC offices responsible for tracking and monitoring all released UDAs until conclusion of investigation
   a) Any released UDAs arrested and/or convicted of either a felony or a misdemeanor will be processed for removal
   b) Comprehensive subject record for all released UDAs to be entered in ICM

e. In rare instances and in conjunction with a certified undercover operation, HSI may purchase or rent proprietary drop houses. These cases require extensive legal, investigatory and humanitarian considerations and should only be considered with a case involving one or more of the DHS sensitive circumstances listed in Appendix G if the ICE US Operations Handbook.

4. Prepare information, evidence, and relevant materials for submission to the AUSA.
   a. All reports, HSI and other agency (if involved), defendant and witness statements, list of evidence, surveillance reports
   b. Draft affidavit prepared with details of probable cause establishing how crime was identified, how the evidence supports it, and results of the enforcement operation.
   c. Coordinate with AUSA for preparation of criminal complaint or criminal indictment.

E. EPO #5: Explain the elements of human trafficking crimes; and define the differences between sex trafficking and labor trafficking/forced labor.

1. Definitions

a. **U.S. Constitution** – 13th Amendment: *Neither slavery nor involuntary servitude...shall exist in the U.S.*

b. **Slavery** – a person held in servitude as the chattel of another/person who is completely subservient to a dominating influence. A “slave” is a person who is wholly subject to the will of another, one who has no freedom of action and whose services were wholly under control of another, and who is in a state of enforced compulsory service to another.

c. **Servitude** – a condition in which one lacks liberty especially to determine one's course of action or way of life

d. **Involuntary Servitude** – “Involuntary servitude” means action by master causing servant to have, or to believe he has, no way to avoid continued service or confinement, but not a situation where servant knows he has a choice
between continued service and freedom, even if master has led him to believe that choice may entail consequences that are exceedingly bad.

e. **Peonage** – form of involuntary servitude in which the status or condition of compulsory service is based upon the indebtedness of the peon to the master

1) Involuntary servitude is different from peonage in that peonage requires a debt to be owed from the peon to the master and the peon is working off that debt.
2) Involuntary servitude, on the other hand, is the involuntary service by a person with no debt owed.

<table>
<thead>
<tr>
<th>Summary</th>
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<tbody>
<tr>
<td>Slave – owned by and under complete control of another person</td>
</tr>
<tr>
<td>Involuntary Servitude – under complete control of another person</td>
</tr>
<tr>
<td>Peonage – servitude by one person who owes a debt to another person</td>
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a. Three ways to commit crime:

1) **Kidnap or carry away** any other person with the intent that such other person be sold into involuntary servitude or held as a slave
2) **Entices, persuades, or induces** any other person to go on board any vessel or to any other place with the intent that he or she may be made or held as a slave, or sent out of the country to be so made or held or
3) **Obstructs**, or attempts to obstruct, or in any way interferes with or prevents the enforcement of this section.


c. Example: Jay convinced Fred and Billy to board a vessel in Honduras by convincing them that Felix would get them into the U.S. with forged entry documents. In reality, Jay
knew that Felix planned to sell them into slavery. Jay is guilty of 18 U.S.C. § 1583 – Enticement into slavery.

d. **Penalties:**

1) <20 years and/or fine.
2) Any term of years up to life and/or fine if death results from the violation, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill.


a. Three ways to commit crime

1) Knowingly and willfully **holds to** involuntary servitude or
2) **Sells into** any condition of involuntary servitude, any other person for any term, or brings within the United States any person so held or
3) **Obstructs,** attempts to obstruct, or in any way interferes with or prevents the **enforcement of this section.**

b. A victim having opportunities to escape does not preclude a conviction for holding a person in involuntary servitude, where the victim is placed in such fear of physical harm that he is afraid to leave. **U.S. v. Warren, 772 F.2d 827 C.A. 11 (Fla.) 1985.**

c. Example: In the examples above, we would charge Felix with 1584.

d. Example: Ms. Veerapol, a native of Thailand and the common-law wife of a Thai ambassador, operated a Thai restaurant in Los Angeles. While in Thailand in the summer of 1989, Veerapol approached Nobi Saeieio, a non-English-speaking Thai villager, and offered her transportation to, and two years of employment in, the United States at a substantially higher wage than Saeieio could earn in Thailand.

Saeieio and two other Thai workers at Veerapol’s Los Angeles home and restaurant were required to work long hours performing various chores. Veerapol also used her Thai workers’ identities to open bank and credit card accounts, which she then used for her own benefit. She also isolated her workers and maintained control over them through verbal abuse, threats of legal action, physical force, and threat of death.
Veerapol was indicted on charges of harboring aliens, involuntary servitude, and mail fraud. She was convicted and ordered to pay restitution to Saeieo. U.S. v. Veerapol, 312 F.3d 1128 (9th Cir 2002).

e. Penalties:

1) <20 years and/or fine.
2) Any term of years or life imprisonment and/or fine under title 18, United States Code if death results from the violation, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill.


a. Two ways to commit crime

1) Knowingly provides or obtains the labor or services of a person by any one of, or by any combination of, the following means:

   a) By means of force, threats of force, physical restraint, or threats of physical restraint to that person or another person;
   b) By means of serious harm or threats of serious harm to that person or another person;
   c) By means of the abuse or threatened abuse of law or legal process; or
   d) By means of any scheme, plan, or pattern intended to cause the person to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint.

   OR

2) Benefits financially or by receiving anything of value

   a) From participation in a venture which has engaged in the providing or obtaining of labor or services
   b) By any of the means described above,
   c) Knowing or in reckless disregard of the fact that the venture has engaged in the providing or obtaining of labor or services by any of such means.
b. Comments: For the purposes of this statute, the term “abuse or threatened abuse of law or legal process” means the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action.

c. The term “serious harm” means any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing labor or services in order to avoid incurring that harm.

d. Example: Maria Garcia made arrangements whereby men and boys from Mexico were transported to New York State and housed in isolated, overcrowded and unsanitary conditions and were required to work in the fields of local growers.

1) Further, Maria refused to permit these workers to leave their housing units for any reason other than work and failed or refused to pay them their wages. She also threatened them with physical violence and with being caught and deported by the Immigration and Naturalization Service if they attempted to leave.

2) The workers were repeatedly told that they owed large sums of money to her and could not leave without paying off their debts and on occasion, Maria Garcia refused to provide the workers ... with any food. Maria also told the workers that, if they tried to escape, they would be hunted down and returned to her. **U.S. v. Garcia, 2003 WL 22956917 W.D.N.Y. 2003.**

e. Example: On May 13, 2007 employees of a Long Island donut shop called 911 to request assistance for a seemingly homeless woman. The woman, who was
dressed only in pants and a towel, had used hand gestures and halting words to convey to shop employees that she had been struck repeatedly in the face by her "master." With the aid of an interpreter, federal and local authorities learned from the woman that her name was Samirah and she was a native of Indonesia who, since February 5, 2002, had worked as a domestic servant for Varsha Sabhnani, a native of Indonesia, and her husband, Mahender Sabhnani, a native of India, who both became LPR’s and then American citizens.

Samirah explained that the Sabhnanis sent $100 a month to her daughter in Indonesia. She also stated she was forced into servitude and that she experienced routine physical abuse at the hands of Varsha Sabhnani and with the knowledge of Mahender Sabhnani. Samirah advised the officers that another Indonesian woman [named] was also working at the house under similar forced conditions.

In the course of a joint investigation HSI agents executed search warrants at the Sabhnanis’ home, where they found a second Indonesian woman hiding in a small closet, and seized various items that appeared to corroborate Samirah’s account of physical abuse. The Sabhnanis admitted knowing that the two Indonesian women entered as B-2 visitors, overstayed, and were illegally present in the United States. The Sabhnanis were arrested and convicted of two counts of forced labor. U.S. v. Sabhnani, 599 F.3d 215 (2d Cir 2010).
f. **Penalties:**

1) <20 years and/or fine.
2) Any term of years or life imprisonment and/or fine under title 18, United States Code if death results from the violation, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill.


a. Two ways to commit crime

1) Holds or returns any person to a condition of peonage, or arrests any person with the intent of placing him in or returning him to a condition of peonage or
2) Obstructs or attempts to obstruct, or in any way interferes with or prevents the enforcement of this section.

b. It is sufficient to constitute peonage that a person is held against his/her will and made to work to pay a debt; the amount of which and the means of coercion is immaterial.

c. Example: Sanjeev owes Andre $5,000. Sanjeev has no way of paying that amount of money to Andre, so Andre and Sanjeev agree that Sanjeev will work off the debt. During that time, Sanjeev is under the complete control of Andre.
d. **Penalties:**

1) <20 years and/or fine.
2) Any term of years or life imprisonment and/or fine under title 18, United States Code if death results from the violation, or if the violation includes kidnapping or an attempt to kidnap, aggravated sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill.


a. **Elements**

1) Whether inside or outside the United States,
2) Seizes or detains and threatens to kill, to injure, or to continue to detain another person
3) In order to compel a third person or a governmental organization to do or abstain from doing any act as an explicit or implicit condition for the release of the person detained or
4) Attempts or conspires to do so.

b. It is not an offense under this section if the conduct required for the offense occurred outside the United States unless:

1) The offender or the person seized or detained is a national of the United States;
2) The offender is found in the United States; or
3) The governmental organization sought to be compelled is the Government of the United States.

c. Comments: It is not an offense under this section if the prohibited conduct occurred in the United States, each alleged offender and each person seized or detained are nationals of the U.S., and each alleged offender is found in the U.S., unless the government organization sought to be compelled is the United States.
d. **Penalties:**

   1) Any term of years or life imprisonment
   2) Death or life imprisonment if death of any person results.

   e. Example: In the weeks leading up to the day of the actual kidnapping, Felix Corporán-Cuevas and Félix Beras planned, prepared for, and agreed to effect the kidnapping of Carlos de la Rosa Berbera and hold him for ransom. On April 18, 1996, in the District of Puerto Rico, Felix Corporan-Cuevas’s co-conspirator Félix Beras and an
unidentified individual abducted thirteen-year old Carlos de la Rosa Berbera who was traveling in a car with his grandmother, Carmen Villar-Cordero. At gun-point, the two kidnappers ordered Mrs. Villar-Cordero out of the car and drove off with her grandson. Two hours later, Mrs. Villar-Cordero received a ransom call, ordering that she produce the child’s parents or money in exchange for her grandson’s freedom. By then, it appeared that, in addition to Félix Beras, defendant Corporán and two other men were holding young Carlos. The FBI succeeded in rescuing the child four days later in Rio Piedras. Both Corporán and Beras were on the scene and were arrested. Corporán freely admitted that he was a national of the Dominican Republic. U.S. v. Corporan-Cuevas, 244 F.3d 199 C.A.1 (Puerto Rico) 2001.


   a. Two ways to commit crime

   1) Recruit, harbor, transport, provide, or obtain by any means, any person for labor or services in violation of 18 U.S.C. §§ 1581-1596 or

   2) Obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section.

   b. Example: Refer back to several of the examples given previously and identify circumstances where criminal defendants can be said to have knowingly recruited, harbored, transported, provided, or obtained a person for labor or services in violation of 18 U.S.C. §§ 1581-1596.

   1) Ms. Veerapol?
   2) María García?
   3) Versha and Mahender Sabhmani?

   c. Example: What if Tony recruited Thai workers and made them available to Veerapol knowing that they would be subjected to involuntary servitude or forced labor? Tony could be charged with 1590, as well.

   d. **Penalties:**

   1) <20 years and/or fine.
   2) Any term of years or life imprisonment and/or fine under title 18, United States Code if death results from the violation, or if the violation includes kidnapping or an attempt to kidnap, aggravated
sexual abuse or the attempt to commit aggravated sexual abuse, or an attempt to kill.


   a. **Elements**

      1) Benefits, financially or by receiving anything of value.
      2) From participation in a venture which has engaged in any act in violation of:

         a) 1581(a) – Holds or returns any person to a condition of peonage, or arrests any person with the intent of placing him in or returning him to a condition of peonage
         b) 1592 – Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor
         c) 1595(a) – Civil remedy

      3) Knowing or in reckless disregard of the fact that the venture has engaged in such violation

   b. Example: Julian ran into some financial problems in Italy. He owed a large sum to Franco and Franco told Julian that he could work off his debt in the U.S. Franco required Julian to pay back $200 a week. Franco took Julian to the U.S. and told Julian to work at Rocco’s Stone and Gravel Emporium. In order to work at Rocco’s, Julian needed to rent tools. Strangely enough, the weekly tool rentals cost roughly the same amount that Julian owed Franco. In this instance, Rocco benefited financially from Julian’s peonage because of the tool rental. Rocco committed an 18 U.S.C. § 1593A violation.


   a. **Four ways to commit crime**

      1) Recruit, entice, harbor, transport, provide, obtain, or maintain a person by any means

         a) Knowing, or in reckless disregard of the fact, that means of force, threats of force,
fraud, coercion, or any combination of such means will be used to cause
b) The person to engage in a commercial sex act or

2) Benefit, financially or by receiving anything of value, from participation in a venture which has engaged in recruitment, enticement, harboring, transporting, providing, obtaining, or maintaining a person by any means
a) Knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause
b) The person to engage in a commercial sex act or

3) That the person has not attained the age of 18 years and will be caused to engage in a commercial sex act or

4) Obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section.

b. The statutory language found in 18 U.S.C. § 1591 (c) [effective only for prosecution of crimes committed on/after December 23, 2008], states that in a prosecution under 18 U.S.C. § 1591 (a)(1) where a defendant had a reasonable opportunity to observe the person recruited, enticed, harbored, transported, provided, obtained, or maintained, the government need not prove that the defendant actually knew the person had not attained the age of 18 years. So
for crimes committed on December 23, 2008 or later, the law imposes strict liability with regards to a criminal defendant’s awareness of the victim’s age, thus relieving the government’s usual burden to prove knowledge or reckless disregard of the victim’s underage status under 18 U.S.C. § 1591 (a)(1). A good example of this strict liability in action is found at United States v. Robinson, 702 F.3d 22 (2nd Cir. 2012).
c. Important statutory terms:

1) The term "abuse or threatened abuse of law or legal process" means the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action.

2) The term "coercion" means (a) threats of serious harm to or physical restraint against any person; (b) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (c) the abuse or threatened abuse of law or the legal process.

3) The term "commercial sex act" means any sex act, on account of which anything of value is given to or received by any person.

4) The term "serious harm" means any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.

5) The term "venture" means any group of two or more individuals associated in fact, whether or not a legal entity.
Example: In January 2005, 18 year old high school student Kelsey Kirschman began dating 26 year old Jerome E. Todd. In May 2006, Todd suggested they get a place together, and told Kirschman they could get rich together if she worked as a prostitute. She agreed, and he ran advertisements of her, offering “full service” for $200, in addition to directing her to walk the track, which was an area frequented by prostitutes and potential customers. Todd forced Kirschman to give him all her money, and Todd maintained his rules psychologically by emotionally and physically abusing her.

Between 2006 and 2007, Todd added three more women to his “stable.” The court concluded that Todd knew he would follow the same pattern with Whitney T. and then with Whitney E. and Jemelle L. Jerome Todd knew that he would use coercion to cause his sex workers to make money for him. U.S. v. Todd, 627 F.3d 329 (9th Cir 2010).

e. **Penalties:**

1) 15 years minimum imprisonment or for life and a fine under title 18, United States Code if the offense was effected by means of force, threats of force, fraud, or coercion [as defined in the statute] or by any combination of such means.

2) 15 years minimum imprisonment or for life and a fine under title 18, United States Code, if the victim recruited, enticed, harbored, transported, provided, or obtained had not attained the age of 14 at the time of such offense,

3) 10 years minimum imprisonment or for life and a fine under title 18, United States Code if the offense was not effected by means of force, threats of force, fraud, or coercion [as defined in the statute] or by any combination of such means, and the person recruited, enticed, harbored, transported, provided, or obtained had attained the age of 14 years but had not attained the age of 18 at the time of such offense,

4) <20 years and/or fine under title 18, United States Code for whoever obstructs, attempts to obstruct, or in any way interferes with enforcement of this section.
10. 18 U.S.C. § 1592 – Unlawful conduct with respect to documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor.

a. Three ways to commit crime:

1) Destroys, conceals, removes, confiscates, or possesses

any actual or purported passport or other immigration document, or any other actual or purported government identification document

of another person

in the course of a violation of section:

a) 1581 – peonage
b) 1583 – enticement into slavery
c) 1584 – sale into involuntary servitude
d) 1589 – forced labor
e) 1590 – trafficking with respect to peonage, slavery, involuntary servitude, or forced labor
f) 1591 – sex trafficking
g) 1594(a) – attempt to do any of the above

with intent to violate section 1581, 1583, 1584, 1589, 1590, 1591;

OR

2) To prevent or restrict or to attempt to prevent or restrict, without lawful authority, the person’s liberty to move or travel, in order to maintain the labor or services of that person, when the person is or has been a victim of a severe form of trafficking in persons as defined in section 103 of the Trafficking Victims Protection Act of 2000 (1591 – sex trafficking) [22 U.S.C. § 7102 and 18 U.S.C. § 1591(e)]

OR

3) Obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section.

b. Comment: Section a. above, does not apply to the conduct of a person who is or has been a victim of a severe form of trafficking in persons, as defined in section 103 of the Trafficking Victims Protection Act of 2000 [22 U.S.C. §
7102] if that conduct is caused by or incident to, that trafficking.

c. Penalty: <5 years and/or fine.
d. Example: While working for a U.S. citizen homeowner, Becky, a citizen of Panama, was unlawfully brought into the U.S. to engage in house work and if she refused her family in Panama would be killed (in violation of 18 U.S.C. § 1589). To further ensure that she complied, the homeowner burned Becky’s Panamanian passport. In addition to violating the forced labor provision, the homeowner also violated 18 U.S.C. § 1592.


a. 18 U.S.C. § 1594(a) – Whoever attempts to violate section 1581, 1583, 1584, 1589, 1590, 1591 of Title 18 U.S. Code shall be punishable in the same manner as a completed violation of such section.

b. 18 U.S.C. § 1594(b) – Whoever conspires with another to violate section 1581, 1583, 1589, 1590, or 1592 of Title 18 U.S. Code shall be punishable in the same manner as a completed violation of such section.

c. 18 U.S.C. § 1594(c) – Whoever conspires with another to violate section 1591 shall be fined under title 18, United States Code, imprisoned for any term of years or for life, or both.

d. Example: Frank and Joe conspired to commit a violation of 18 U.S.C. § 1589 (forced labor). They will be sentenced for the forced labor and the conspiracy to commit forced labor per 18 U.S.C. § 1594(b), which will carry an additional penalty equal to the forced labor violation.

e. Penalties:

1) Same as underlying offense for an attempt to commit a violation of 1581, 1583, 1584, 1589, 1590, or 1512.

2) Same as underlying offense for any conspiracy to commit a violation of 1581, 1583, 1589, 1590, or 1592.

3) For conspiracy to violate 1591, fined under title 18, United States Code, imprisoned for any term of years or for life, or both.

4) Forfeiture of any property used in the commission of the offense or derived from proceeds from the commission of the offense.
c. 24 year old June was forced to work at Chan’s grocery store to pay back the outstanding debt owed to Chan.

 Chan:
  • 18 U.S.C. § 1589 – Forced labor

F. EPO #6: Define human trafficking and identify indicators to establish violations of human trafficking statutes.

1. Definition of human trafficking:

   a. The recruitment, enticement, harboring, transportation, provision, obtaining, patronizing or soliciting of a person (regardless of citizenship or immigration status), by means of threat or use of force, fraud, or coercion, subjecting victims to involuntary servitude, peonage, debt bondage, or slavery for the purpose of sexual exploitation or forced labor.

   b. The statutes governing this offense are contained within 18 USC §§ 1581-1594, the associated Mann Act statutes of 18 USC §§ 2421-2424, and Title 8 USC § 1328, Importation and Harboring of Aliens for Immoral Purposes.

   c. Trafficking Victims Protection Act of 2000 (TVPA) – Public Law 106-386

      1) Enacted in October 2000.
      2) Prior to that, no comprehensive federal law existed to protect victims of trafficking or to prosecute their traffickers.
      3) Human trafficking is increasingly committed by organized, sophisticated criminal groups, and is the fastest growing source of profits for organized criminal enterprises worldwide.
      4) Profits from trafficking industry contribute to the expansion of organized crime in the U.S. and worldwide.
      5) TVPA goals:

         a) Combat and prevent human trafficking overseas
b) Protect victims and help them rebuild their lives in the U.S. with federal and state support 
c) Prosecute traffickers of persons under stiff federal penalties

d. Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA)

1) In 2003, the Bush Administration authorized more than $200 million to combat human trafficking through (TVPRA) 
2) Renews U.S. government’s commitment to identify and assist victims exploited through labor and sex trafficking in the U.S. 
3) Provides resources and initiatives to assist the 18,000-20,000 victims of human trafficking who are trafficked into the U.S. every year.

a) Augments the legal tools that can be used against traffickers by empowering victims to bring federal civil suits against traffickers for actual and punitive damages, and by including sex trafficking and forced labor as offenses under the Racketeering Influenced and Corrupt Organization statute.

4) Also encourages the nation’s 21,000 state and local law enforcement agencies to participate in detection and investigation of human trafficking cases.

5) U.S. Department of Health and Human Services has a significant role in implementing the law’s victim-centered, compassionate approach to finding and aiding the victims of this modern-day slave trade.

e. Trafficking Victims Protection Reauthorization Act of 2013 (TVPRA)

1) In addition to 2003, the Act has been reauthorized in 2005, 2008, 2011, and 2013.

2) TVPRA 2013 provides for the following:

a) In general, 18 USC Chapter 77, Peonage, Slavery, and Trafficking in Persons, is amended by adding at the end § 1597 – Unlawful Conduct with Respect to Immigration Documents.
"(a) Destruction, concealment, removal, confiscation, or possession of immigration documents — It shall be unlawful for any person to knowingly destroy, or, for a period of more than 48 hours, conceal, remove, confiscate, or possess, an actual or purported passport, other immigration, or personal identification document of another individual —

(1) In the course of a violation of section 1351 of this title or section 274 of the Immigration and Nationality Act (8 U.S.C. 1324);

(2) With intent to violate section 1351 of this title or section 274 of the Immigration and Nationality Act (8 U.S.C. 1324); or

(3) In order to, without lawful authority, maintain, prevent, or restrict the labor of services of the individual.

(b) Penalty — Whoever violates subsection (a) shall be fined under this title, imprisoned for not more than 1 year, or both.

(c) Obstruction — Whoever obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be subject to the penalties described in subsection (b)."

2. Investigatory leads may come from:

a. Information developed through working with local law enforcement
b. Statements of aliens revealing they were victims of trafficking
c. Referrals from DHS entities upon the discovery of victims of trafficking
d. Informants and tipsters
e. Other ICE investigations or enforcement activities
f. Non-governmental organizations and advocacy groups
   1) Key source because of their work in the community and ability to build trust
   2) Can help to identify and aid victims who often fear any contact with authorities
   3) HQ and local HSI offices conduct outreach programs to establish relationships with NGOs to identify and aid victims and prosecute violators

   g. Relatives or associates of aliens or victims familiar with a trafficking scheme.
   h. Web-based classified advertisements such as Backpage.com and various social media.

3. Indicators of human trafficking:
   a. Is the victim in possession of identification and travel documents? If not, who has control of them?
   b. Was the victim coached on what to say to law enforcement and immigration officials?
   c. Was the victim recruited for one purpose and forced to engage in some other job?
   d. Is the victim's salary being garnished to pay off a smuggling fee?

   1) Paying off a smuggling fee alone is not considered trafficking.
   2) However, it can be considered as an element of Forced Labor.

   e. Was victim forced to perform sexual acts?
   f. Does the victim have freedom of movement?
   g. Has the victim or family been threatened with harm if the victim attempts to escape?
   h. Has the victim been threatened with deportation or law enforcement action?
   i. Has the victim been harmed or deprived of food, water, sleep, medical care or other life necessities?
   j. Can the victim freely contact friends or family?
   k. Is the victim a juvenile engaged in commercial sex?
   l. Is the victim allowed to socialize or attend religious services?
   m. Heavy security at commercial establishments.
1) Check to determine if security measures seek to keep unauthorized persons out, or workers in.
2) Which way does the barbed wire face?

n. Victims live at same premises as worksite or are driven from worksite to quarters by guards.
o. Victims accompanied by translator (may be trafficker) when visiting hospitals or doctors.
p. Bruises, fractures or other untreated medical problems
q. Malnutrition
r. Signs of rape or sexual abuse
s. Earnings controlled by others
t. Nervousness (especially if translator/trafficker present)

4. Elements that constitute a trafficking victim

a. Must contain an element of force, fraud, or coercion (actual, perceived or implied), unless under 18 years of age and involved in commercial sex acts.
b. Forced labor and/or exploitation; requires an element of Force, Fraud or Coercion regardless of the age of the victim.
c. Persons trafficked are victims.
d. Enslaved, subjected to limited movement or isolation, or had documents confiscated
e. Need not involve the actual movement of the victim.
f. No requirement to cross an international border.
g. The person need not be actively involved in forced labor or commercial sexual services. Can be identified as a victim based upon historical circumstances, provided HSI agents make substantial corroboration of the facts.

5. Sex Trafficking vs. Labor Trafficking and Forced Labor

a. In Sex Trafficking, the overt act itself (commercial sex, sexual servitude) is most often a violation of law in its own right, and is always illegal with respect to minors.
b. In Labor Trafficking and Forced Labor, the overt acts are usually some type of legitimate business (services, agriculture or domestic work) being utilized to employ slave labor. The fact that minors can be legally employed in a number of these areas makes discovering and investigating these cases much more complex.
G. EPO #7: Identify common methods of operation utilized by human trafficking organizations.

1. Trafficking organization structure
   a. Recruiter – Uses multi-media advertisements, personal contact networks, or family sales to obtain victims in source countries.
   b. Arranger/Coordinator – Facilitates acquisition of travel documents, either fraudulent or legitimate, and arranges transport to the U.S.
   c. Receiving Co-conspirator – Receives victims upon arrival in the U.S. and arranges temporary staging locations and retrieves travel documents, reveals debt bondage, and distributes or resells victims to business owners/managers.
   d. Transporter – Transport victims from harboring location to job site, or between different job sites, or on out-calls for escort services and out-call prostitution (house calls). Can operate locally or across state lines.
   e. Harboring/security – Maintains victims at harboring site or job site, prevents escape and freedom of movement, and may double as transporter.
   f. Business owner/manager – May employ victims in prostitution, agricultural, garment, or other industries, or be involved in domestic servitude for themselves or others.
      1) Business owner may be independent of the traffickers operation and thus be unaware of the victim’s true situation (unwitting participant).
   g. All these roles may be held by more than one person, and one person may play multiple roles at one or varying times in the human trafficking organization.

H. EPO #8: Identify investigative approaches and actions to investigate each type of human trafficking case.

1. Trafficking victim identification and assessment
a. Sexual exploitation cases can be found in brothels, massage parlors, escort services, "modeling studios" and strip clubs.

b. Forced labor cases can be found in sweat shops (abusive labor standards), commercial agriculture/processing plants or domestics (maids, nannies) or construction.

2. Investigative approach

a. Victim-centered philosophy

1) HSI’s victim-centered philosophy states that protection of trafficking victims is of equal importance with the apprehension and prosecution of the traffickers.

2) Especially true in cases involving juveniles and sexual exploitation. HSI wants to minimize the potential for continued victimization whenever possible.

b. Investigative priorities (victim is priority)

1) Victims of severe forms of trafficking often suffer both physical and emotional harm. HSI will facilitate procurement of aid and victim services through liaison with social service agencies and NGOs to provide victims of trafficking with as much assistance as available.

2) Includes assistance with applications for continued presence and other governmental aid.

c. Engage NGOs

1) Local SAC offices will have established relationships with area Non-governmental organizations that have been identified as having the expertise and resources to assist with the needs of trafficking victims. HSI SAC victim witness specialists work to identify new potential NGOs willing to assist with victim services consistent with DHS and HSI policy in an effort to provide victims with basic needs and counseling.

d. Focus on converting reactive to proactive investigations

1) Whenever possible, HSI Agents should seek to target suspected violators beyond the immediate reactive cases brought to HSI attention.
2) HSI agents will often work with other law enforcement agencies on anti-trafficking task forces, and for international trafficking cases, with HSI attaché offices abroad.

3. Prepare information, evidence, and relevant materials for submission to the AUSA.
   a. Crime is against the person. Your evidence (the victim) needs to tell the story.
   b. All reports, statements, list of evidence, witness statements, and surveillance reports
   c. Written affidavit prepared with details on how crime was identified, how the evidence supports it, and results of the enforcement operation
   d. Coordinate with AUSA for preparation of criminal complaint or criminal indictment.
   e. If there is no victim story, a prosecution for trafficking is extremely unlikely.

4. Considerations in dealing with trafficking victims
   a. Many times victims are foreign nationals who may not speak or understand English. It is important to have the ability to communicate with the trafficking victims, as well as any suspected traffickers, so interpreters fluent in any foreign national victim's language and dialect may be vital to the successful conclusion of a case.
   b. Because of the circumstances of their victimization, many foreign national victims, unfamiliar with U.S. culture, may feel isolated, be afraid of speaking with authorities and feel that they will be held responsible for what has happened to them. Abuse suffered by domestic trafficking victims may make them jaded or numb to their own suffering, and they may initially react to law enforcement in an angry or confrontational manner, as a defense mechanism.

1) Many times traffickers will use a foreign national victim's illegal status in the U.S. as a means of coercion, as well as threats against a victim's family members living in other cities or other countries.

2) Traffickers will attempt to make victims become dependent on opioids or other drugs. Case law has proven substance abuse to be a means of victim coercion.

   c. Agents need to conduct themselves in a manner to reassure victims that HSI is there to help them, and that their safety is our first priority.
1) Agents should keep in mind that many foreign national victims come from countries where law enforcement is not seen as a protector of the people, and they may harbor fears of law enforcement that make it difficult for them to trust the agents.

2) Agents should attempt to allay these fears through the use of the least confining custodial setting possible, minimizing exposure of weapons, badges and agency identifying logos, and keeping social service agencies engaged from the outset of the alien’s involvement as witnesses.

3) Agents should understand that many victims have been subjected to abuse for an extended period of time, and the ability to establish trust with a victim could also take an extended period of time.

5. Considerations for handling trafficking victims encountered as a result of enforcement actions.

a. Considerations prior to HSI enforcement actions targeting trafficking organizations and their victims.

1) If foreign national victims are anticipated, identify interpreters for lodging, processing, interviews, and victim assistance.

2) Work closely with HSI SAC Victim Assistance Specialist to identify NGO availability and resources, both short- and long-term, who are able to assist HSI during initial onsite processing and subsequently provide services to trafficking victims.

3) Have HSI SAC VAS work with NGO to identify temporary housing following release.

4) Arrange transportation to previously secured temporary transitional housing that includes security arrangements to prevent traffickers/media from accessing site.

   a) Avoid use of marked or caged prisoner transport vans.

5) Remind the NGOs of the importance of safety and security for the victims during the initial transitional period, and to not disclose information concerning the law enforcement operation or victims’ whereabouts.

b. Considerations during enforcement actions
1) Have all potential victims gather one small bag of their most important personal belongings (clothes, papers, medications, money, and hygiene items).
2) If multiple locations are involved, assign/label each potential victim with identification tag (colored wristbands, etc.) to indicate the arrest location; and tag bags with victim's name and location from which belongings were recovered.

c. Considerations following enforcement actions

1) Conduct initial interviews – initially focus on learning their story. What happened to THEM.
   a) The process of showing the victim that they are important starts here.
   b) Use any information provided to identify possible additional victims and identify possible targets.

2) Take all necessary steps during initial encounter to prevent interaction between potential victims, targets, and possible co-conspirators.
3) If possible, process groups separately.
4) Transport victims to off-site transitional housing as soon as logistically possible.
5) During transitional phase, work with HSI VAS to have NGOs on site arrange meetings with the victims, preferably in a group setting, to explain the situation as best as possible and potential benefits such as Continuing Presence, social services, etc.
6) Unless there is health emergency, or an investigatory need to have sexual assault/abuse exams performed, NGO’s will arrange for health screening as a part of their intake process.

I. EPO #9: Identify various programs within HSI designated to provide assistance to identified victims of human trafficking.

1. Smuggled aliens and victims of trafficking
   a. Smuggled aliens
1) Critical to investigation as material witnesses – a need to tell the story
2) May be detained temporarily, or granted parole status and released into U.S. pending the outcome of the investigation and prosecution.
3) Once their cooperation is completed, most subjects are placed back into removal proceedings.

b. Victims of trafficking

1) Consistent with HSI’s victim-centered approach, subject is first and foremost a victim who must be protected, and may also be a witness.
2) Foreign nationals are eligible for Continued Presence (CP) in U.S. as well as the ability to apply for a T or U visa.
3) Both foreign and domestic victims of trafficking are eligible to receive protections and benefits under U.S. law.

2. Authorities requiring victims’ rights and services:


1) Includes mandatory services


1) Includes court-enforceable rights

c. Additional rights and requirements exist in other statutes and rules of criminal procedure.

3. Victim definition, per HSI Directive 1007.1, HSI Victim Assistance Program, August 25, 2011, includes:
a. A person directly or proximately harmed as a result of the commission of a federal offense; may be located outside the US.
b. A person culpable for or accused of the crime being investigated or prosecuted shall not be considered a victim for purposes of rights and services.
c. A person who may be culpable for violations or crimes other than the crime being investigated or prosecuted may be considered a victim under this directive; for example:

1) Victims of involuntary servitude or trafficking may be considered victims for purposes of prosecution of those crimes, despite any legal culpability they may have for ancillary immigration or prostitution offenses.
2) Criminal suspects who are subjected to excessive force by law enforcement officers.
3) Inmates who are victims of crime during their incarceration may be considered victims.

d. Witness – a person who has information, knowledge, or evidence concerning a crime and provides information to an LEA.

1) A victim of a crime may become a witness and a witness who is threatened may become a victim.
2) This Directive does not cover confidential informants or undocumented sources of information.

4. Special victim populations – federal statutory provisions for services for victims of:

a. Domestic violence, stalking, or sexual assault
b. Child abuse

1) Mandatory reporting of any suspected child abuse or exploitation under state and federal law – responsibility of individual SAs, with sanctions for failing to report.

c. Identity theft
d. Human trafficking

5. Procedures when identifying victims:

a. Identify cases with identified crime victims in ICM with Program Code 16D.
b. ICM subject record status HT for non-suspect/victim of HT
6. Services and rights of victims:

   a. At the earliest opportunity after detection of a crime, responsible official shall provide identified victims with information about services available to them.

   b. Services include:

      1) Referral to place to receive emergency medical or social services
      2) Availability of restitution or other relief victim may be entitled to
      3) Public and private programs for counseling, treatment, other support
      4) Reasonable protection – not a service per se but a required consideration

   c. Services for victims of domestic violence, stalking or sexual assault

      1) Immigrant victims of domestic violence should be informed that they may petition for immigration protections and relief and assistance available under federally-funded programs
      2) Victims can have investigating agency pay for forensic sexual assault exam (with no requirement to cooperate with LEA)

   d. Services for victims of child abuse

      1) Requires forensic interview by HSI Forensic Interview Specialist

         a) Fact-finding investigative interview that assists in determining whether or not a crime has been committed using non-leading, developmentally appropriate, and victim-sensitive approach

      2) Age-appropriate support services to victims and referrals for community-based services to parents and guardians as indicated.
      3) Privacy protection for child victims and witnesses

         a) Child’s name or other identifying information (other than initials or an alias) should not be reflected in court documents or other public records unless otherwise required by law.
e. Services for victims of human trafficking

1) Foreign national victims of severe form of trafficking, as identified by federal LEA, are eligible for certain benefits and services such as employment authorization and parole without regard to their immigration status.
2) May be eligible for public benefits
3) Shall not be detained in facilities inappropriate to their status as crime victims

7. The HSI Victim Assistance Specialist (VAS) or Victim Assistance Coordinator (VAC) should be the primary point of contact for case agents to coordinate victim services as needed.
   a. During investigation the investigating agency is responsible for referring victim to services.
   b. Once an investigation has transferred to the prosecutorial entity or charges are filed, responsible officials from the prosecutorial entity are responsible for ensuring referrals for services are made.

8. Case agent’s focus in all human trafficking cases must be on victim and victim’s safety.
   a. Investigation is secondary to recovery and well-being of victim.
   b. When necessary, coordinate with VAS or VAC for forensic interview of victim.
   c. Ensure coordination by VAS or VAC with local NGOs and victim service providers.


(HSI Directive 10075.2 dated 10/06/2016- Continued Presence)

a. Provided statutorily under Trafficking Victims Protection Act
   1) LEO makes initial determination if individual is victim of a severe form of human trafficking:
      a) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or
      b) If person is under 18 and induced to perform a commercial sex act
c) Recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery

2) Determination is made as early and as expeditiously as possible, in accordance with HSI's Victim-centered approach.

b. Federal LEOs are authorized to submit CP applications
   1) Should be submitted as soon as victim is identified
   2) Coordinate with SAC Victim Assistance Specialist
   3) Approved by HSI Law Enforcement Parole Branch

c. CP granted initially for up to two-years, with extension of up to two years.

d. Victim’s cooperation with LEA is not required for eligibility but other assistance may be available to cooperating witnesses.
   1) Benefits may include housing, educational assistance, food stamps.
   2) Award of benefits to minor victims does not require cooperation with LEA to receive benefits.

e. Employment authorization document (EAD), which can be used as identity document, issued to alien with CP
   1) Aliens without legal status/lawful entry also issued I-94.

10. Victims of human trafficking may apply for T visa
    Capped at 5,000 available annually
    a. Available to victims and qualifying family members
       1) Permits visa-holder to remain in U.S. for up to four years and can lead to adjustment of status to LPR.
       2) Coordinated by Victim Assistance Specialist.
       3) Certification of application (Form I-914, Supplement B) by LEA is primary evidence that applicant is victim of severe form of trafficking and has complied with reasonable request for assistance in investigation or prosecution.
11. U visa available to victims of certain serious crimes and qualifying family members
   Capped at 10,000 available annually
   a. Specified crimes include rape, domestic violence, extortion, witness tampering, and conspiracy or solicitation to commit such crimes (see Form I-918).
   b. Victim must have suffered substantial physical or mental abuse as result of qualifying crime
   c. Crime occurred in U.S.
   d. Victim possesses information concerning the crime.
   e. LEA certifies that victim has been or is likely to be helpful in investigation or prosecution of the crime, utilizing Form I-918, Supplement B.

12. Segregation of detained aliens
   a. During all transport, interviews and processing, alien suspects must be separated from witnesses and victims.
      1) Coordinate with HSI field office and/or LEA to ensure facilities will be available that will allow separation.
   b. Transport suspects and witnesses in accordance with HSI policy.
      1) Arrange for transport appropriate to size of group with sufficient space to provide separation.
      2) Search all subjects in accordance with policy for any officer-to-officer transfer.
      3) Lead driver is responsible for managing subjects' move into vehicle.
      4) Escort subjects into vehicle, separating males from females by a divider in vehicle, if so equipped. If no divider, seat females in front of secured area.
      5) Juveniles:
         a) No handcuffs on juveniles, unless there is a history of violent behavior, criminal activity, or articulable likelihood of escape.
         b) Must be separated from unrelated adults at all times.
            (1) At least one empty row of seats as separation
            (2) If feasible, unaccompanied juveniles should not be transported in vehicles with detained adults.
c) Must be kept under close supervision and seated near officers.

c. Ensure that suspects are detained in separate holding cell from potential witnesses, victims.

1) Ensure that principals in smuggling operation are separated from witnesses and victims.

J. **EPO #10: Handle an alien smuggling load from initial encounter to writing the criminal complaint.**

1. State and local law enforcement encounter individuals using conveyances to smuggle illegal aliens into and through the U.S. in violation of law.
   
a. Many encounters are traffic-related in nature.
   
b. Others in response to domestic-violence calls, noise disturbance calls, etc.

2. When responding to a traffic-related call from a state or local LEA, determine from LEA:
   
a. Nature and location of traffic stop (What was the reasonable suspicion/probable cause for the stop)
   
b. Number of individuals encountered, their gender, and if minors are present
   
c. Language barrier and unable to verify identification (immigration/identity documents)

3. Determine the number of agents available to respond to call.
   
a. Number of agents may vary based upon individual SAC policies and availability of agents.
   
b. Minimum two agents for load situation if multi-passenger van or smaller.
   
c. Additional agents required for tractor trailer or larger.

4. When arriving at the location of the traffic stop:
   
a. Park safely along busy roads.
b. Activate vehicle lights.
c. Contact Sector and notify regarding vehicle stop.
d. Obtain officer's identifying information (name, phone number)

1) Request copy of the police report and/or ticket.

e. Determine if driver will be arrested.
f. Run the license plate and VIN data of target vehicle.
g. Contain driver and vehicle keys immediately, separate them from the rest of the load, and determine alienage and removability.
h. Briefly determine alienage and removability of aliens
i. Determine if anyone needs medical attention.

1) If so, contact emergency medical services.
2) Agents should escort alien and emergency medical staff to the hospital and remain until the alien is released.

j. Control aliens (hands on head).
k. Extract from vehicle one at a time.

1) One agent controls the driver's side automatic lock function (if vehicle is equipped with one) while another agent removes one person from the vehicle at a time.

l. Determine alienage and removability of each alien.
m. Utilize proper tactics to arrest, search, and detain subjects.

n. Attempt to obtain consent to search and document consent using Form 73-005 (Consent to Search) or conduct inventory search after seizure, using DHS Form 58 (Vehicle/Vessel/Aircraft Inventory and Receipt).

1) Conduct search of vehicle when safe and convenient.

o. Look for pocket trash on aliens and in vehicle.

1) Poll list
2) Vehicle registration information
p. Contact Sector to tow or seize vehicle or have the state
   and locals tow vehicle.
q. Contact Sector with transport information (mileage,
females, minor children, etc.)

1) Contact ERO immediately if unaccompanied minors
   are encountered.

5. Aliens will be transported to the processing facility for EAGLE
   processing and interviewing.

   a. Driver and other persons determined to be involved in
      smuggling scheme transported separately from aliens
      being smuggled.
   b. Transport unaccompanied minors separately from other
      smuggled aliens, if feasible.
   c. Transport females separately from males, if feasible.
   d. Transport family members together, if feasible and if not
      involved in smuggling scheme.

6. If prosecution of smugglers is contemplated, Miranda warnings
   must be given prior to conducting interview. Treat as custodial
   interview in accordance with HSI interview recording policy.

7. Interview smuggled aliens to determine which aliens may serve as
   material witnesses.
8. Provide information of interview and evidence found to AUSA for
   acceptance of prosecution.
II. Demonstration

Students read the scenario and determine the appropriate course of action based on lesson objectives and describe their rationale regarding their decision. Each positive response has a numbered value. The instructor explains rationale regarding the types of initial decisions to be made.

Demonstration Scenario

You are assigned to the Human Smuggling and Trafficking Group in SAC Phoenix. You receive a call from your reliable confidential informant stating that an individual associated with a known alien smuggling organization contacted him, informing him of a load of aliens that were smuggled into the U.S. a couple of days ago.

Your CI tells you that his source told him that they are destined for a drop house in Mesa. Your CI states that the load entered through Nogales and consists of eight people – five males and three females. One of the females appears to be a minor and is not related to any of the other smugglees. The source that your CI knows is the driver who is actually transporting the aliens, and he called the CI because the trip has been boring and he needed someone to talk to.

What would be the appropriate responses to this situation? Which section(s) of law would be applicable?

Proper Responses:

1. Have your CI attempt to get a description of the vehicle that is being used, along with the location of the drop house and the name of the person that he is to deliver the aliens to. (value: 3)
2. Have your CI provide you the name of the driver and his role/level in the smuggling organization. (value: 2)
3. Have your CI get the current location of the vehicle in order to conduct surveillance of the vehicle and surveillance of the drop house. (value: 2)
4. Conduct database checks of the driver, vehicle, and drop/stash house location, and attempt to deconflict. (value: 1)
5. Contact AUSA in order to prepare for search and/or arrest warrants. (value: 1)
6. Prepare to conduct enforcement operation and/or controlled delivery; contact SAC Victim Assistance Specialist to address issue with possible minor. (value: 1)
7. **Sections of law:**

   a. 8 USC §1324(a)(1)(A)(ii) – Transporting an Illegal Alien
   b. 8 USC §1324(a)(1)(A)(iii) – Concealing, Harbor an Illegal Alien

**Improper Responses:**

1. **Contact state/locals to stop vehicle and advise to contact ERO.**
2. **Instruct CI to stand down and make no attempts to contact the smuggler.**
3. **Turn information over to the FBI.**
4. **Instruct CI to tell smuggler that his name has been turned into HSI.**
5. **You conduct a traffic stop of the vehicle in your government-owned vehicle.**
6. **You conduct search of the drop/stash house without authorization.**

**III. Student Practice**

1. Al Lien is a Canadian who has no right to be present in the United States. While in Rossland, Canada, he meets Baker, a U.S. citizen who is driving back to his home in Colville, Washington. Baker tells Al that he needs someone to help on his farm, and offers to pay Al. Al agrees. With what crime can Baker be charged?

   a. 8 U.S.C. § 1324(a)(1)(A)(i) – Bringing in an alien at an unauthorized location
   b. 8 U.S.C. § 1324(a)(1)(A)(iii) – Concealing, harboring, or shielding illegal aliens
   c. 8 U.S.C. § 1324(a)(1)(A)(iv) – Encouraging and enticing alien to enter
   d. 8 U.S.C. § 1327 – Aiding or assisting certain aliens to enter

2. Frank was paid to drive 14 illegal aliens across the border from Mexico into the United States. He does so between the ports of entry at Naco and Douglas, Arizona. Which criminal statute has Frank violated?

   d. 8 U.S.C. § 1324(a)(4) – encouraging or inducing as alien to come to, enter, or reside in the U.S.

3. Dexter was previously deported from the United States in 2002. Without obtaining permission from the Attorney General to re-enter the United States Dexter smuggles himself into the United States by hiding in the trunk of car driven through the Nogales, Arizona port of entry. What crime has Dexter committed?
4. Joey Piscatello has a dry cleaning business at which he employs six illegal alien workers from Honduras. When the six came to work for him they were chained together and remain chained to either the cleaning machines or to their cots in the back room when they are not working. He also threatens them with harming their relatives in Honduras if they try to escape or tell the authorities about their situation. What crime is Joey committing?

a. 18 U.S.C. § 1589 – forced labor
b. 8 U.S.C. § 1328 – entry for immoral purposes
c. 18 U.S.C. § 1001 – false statement
d. 18 U.S.C. § 1591 – sex trafficking of children

5. While executing a search warrant on a known drug dealer’s home, HSI SAs found four women who were dressed in tattered clothes and had various bruises on their bodies. When questioned, the women stated they worked for the home owner. They further admitted to the SAs that they had come to the U.S. to visit the home owner’s sister, but ran out of money and borrowed some from the home owner. As a result, the home owner would not allow them to leave and told them they had to perform various chores at his home until their debts had been satisfied. With what crime can the home owner be charged?

a. 18 U.S.C. § 1203 – Hostage taking
b. 18 U.S.C. § 1581 – Peonage
c. 18 U.S.C. § 1590 – Trafficking for peonage
d. 18 U.S.C. § 1591 – Trafficking by force, fraud, or coercion for sexual purposes

Students read scenario and determine the appropriate course of action based on lesson objectives and describe their rationale regarding their decision. Each positive response has a numbered value. The instructor provides feedback regarding the types of initial decisions to be made.

Practice Scenario 1

You are assigned to the Human Smuggling and Trafficking Group in SAC Atlanta. A sheriff’s deputy from the DeKalb County Sheriff’s Office informs you that during the execution of a local search warrant of a known brothel three 17-year-old girls were encountered and arrested. The sheriff’s deputy attempted to
speak with them but found that they do not speak English and that they may be from Korea.

The sheriff’s deputy also contacted the local Department of Family Services for assistance but was told by his superiors to contact Homeland Security Investigations as well. Encountered along with the three girls were two other adult women from Korea and four adult U.S. citizen males.

During the search, the sheriff’s deputies found Korean passports locked in a desk drawer. The keys to the desk drawer were found in the pants pocket of one of the adult women.

What would be the appropriate responses to this situation? Which section(s) of law would be applicable?

**Proper Responses:**

1. Find out the basis of the search warrant from the sheriff’s deputy to get clear understanding of the situation. (value: 3)
2. Find out from the sheriff’s deputy what will happen to the other persons encountered during the search warrant and if they will be detained. (value: 2)
3. Inform SAC Victim Assistance Specialist of the situation. (value: 2)
4. Inform the ERO Juvenile Officer of the situation (value: 1)
5. Inform GS and gather additional agents and proceed to the search warrant location. (value: 1)
6. Contact HQ/HSHT Forensic Interview Specialist. (value: 1)
7. Sections of law:
   
   a. 18 USC § 1591 – Sex Trafficking of children or by force, fraud, or coercion
   b. 18 USC § 1592 – Unlawful conduct with respect to documents in furtherance of trafficking
   c. 8 USC § 1324(a)(1)(A)(iii) – Concealing, Harboring Illegal Aliens

**Improper Responses:**

1. Dismiss lead because Department of Family Services has been notified and will handle situation.
2. Do not respond because the search warrant is a local law enforcement matter.
3. Refer the case to the FBI because they have jurisdiction over human trafficking of foreign nationals.
4. Refer case to ERO because the women appear to be illegal aliens.
5. Forward the sheriff’s deputy’s name to a local NGO for assistance.
6. Contact the Korea Embassy/Consulate for assistance.
Practice Scenario 2 (may be used for Evaluation)

You are the Duty Agent, but also assigned to the Human Smuggling and Trafficking Group in SAC Tampa. You receive a call from a woman named Lourdes Carbajal. Ms. Carbajal informs you that she received a phone call from her brother Miguel who stated that he is being held hostage while attempting to be smuggled into the U.S.

Ms. Carbajal knew that her brother was attempting to be smuggled into the U.S. and stated that she agreed to pay Miguel’s initial smuggling fees of $1,000. Ms. Carbajal thought the $1,000 covered the entire smuggling venture. The call she received is not from the original smuggler who she initially negotiated with. These smugglers are now insisting that she pay an additional $1,000 or they will harm Miguel.

Ms. Carbajal doesn't recognize the telephone number, but believes it may be from Phoenix, Arizona; she used to live in the Phoenix area and recognizes the area code.

What would be the appropriate responses to this situation? Which section(s) of law would be applicable?

Proper Responses:

1. Make attempt to meet with Ms. Carbajal to get control of her and the phone that the smugglers are contacting her on. (value: 3)
2. Obtain the telephone number that is contacting Ms. Carbajal in order to get subscriber information via administrative subpoena. (value: 3)
3. Question Ms. Carbajal further to see if smugglers forwarded any bank account of money transfer information. (value: 2)
4. Attempt to make consensual monitored phone call to smugglers to obtain “sign of life” call and record. (value: 1)
5. Open case in ICM and contact SAC Office having jurisdiction over hostage location. (value: 1)
6. Sections of law:
   a. 8 USC § 1324(a)(1)(A)(i) – Alien Smuggling
   b. 8 USC § 1324(a)(1)(A)(iii) – Concealing, Harboring Illegal Aliens
   c. 18 USC § 1203 – Hostage Taking

Improper Responses:

1. Tell Ms. Carbajal to send the money to them so her brother will not be harmed.
2. Tell Ms. Carbajal to change her phone number.
3. Refer case to state and local law enforcement that has jurisdiction over hostage taking.
4. Refer case to the FBI.
5. Seek to charge Ms. Carbajal with alien smuggling.
IV. Feedback and Remediation

During the student practice, students will receive immediate feedback from the instructor. Students may be offered remediation with an alternate scenario.

CONCLUSION

I. Summary of Main Ideas

There are important distinctions in the definitions of human smuggling and human trafficking investigations.

ASOs employ a variety of smuggling methods and their organization and operation differs between the southern and northern U.S. borders.

HSI has various tools and investigative methods to pursue these cases, including undercover storefront operations and use of CIs. HSI cooperates with NGOs as well as local law enforcement.

The victims of human trafficking are a top priority, and their rescue and support after the fact are not only HSI policy but can also aid in prosecutorial efforts.

As a Special Agent, not only do you help secure the country, but you also assist those who are victims of crimes, both citizens and aliens. Enforcing violations of human smuggling and trafficking not only reduces the amount of illegal aliens in our country, but also helps innocent victims return to their home countries.

II. Integration

The investigation of human trafficking and human smuggling cases draws on the various techniques and procedures used in other types of investigations.

III. Objectives

You are now able to:

- Explain the elements of human smuggling crimes.
- Define human smuggling and related terms and identify indicators to establish violations of human smuggling statutes.
- Identify the different methods used by Alien Smuggling Organizations (ASOs) to bring aliens into the U.S., including by land, sea and air, both through the Ports of Entry (POEs) and by crossing the borders at other than POEs.
- Determine investigative approaches and actions to investigate human smuggling cases.
- Explain the elements of human trafficking crimes; and define the differences between sex trafficking and labor trafficking/forced labor.
- Define human trafficking and identify indicators to establish violations of human trafficking statutes.
- Identify common methods of operation utilized by human trafficking organizations.
- Identify investigative approaches and actions to investigate each type of human trafficking case.
- Identify various programs within HSI to provide assistance to identified victims of human trafficking.
- Handle an alien smuggling load from initial encounter to writing the criminal complaint.

IV. Motivation

Human trafficking is a form of modern day slavery. HSI places a priority on human trafficking investigations and recognizes victims of human trafficking as crime victims.

In human smuggling cases individuals participate voluntarily in attempting to enter the U.S. illegally.

But often there are areas where these two distinctly different crimes overlap, as when a smuggler uses force or coercion to collect smuggling fees or when promised employment turns into forced labor or commercial sex.

HSI agents conduct criminal investigations into each type of offense, and understanding the differences, and similarities, is essential.

V. Test or Final Activity

This knowledge will be tested in practical exercise #3 (Over the Road). In the scenario, students will be asked to:

- Determine if a human smuggling or human trafficking situation exists.
- Determine who in the vehicle may be a principal in the operation.
- Plan and take investigative steps to develop information required for an affidavit.
- Prepare information for presentation to the AUSA.
## Attachments

<table>
<thead>
<tr>
<th>Description</th>
<th>File Name</th>
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<tbody>
<tr>
<td>Human Trafficking Indicators, Homeland Security Blue Campaign Brochure</td>
<td>Blue Campaign.pdf</td>
</tr>
<tr>
<td>ICE Continued Presence Brochure</td>
<td>ICE Continued Presence Brochure.pdf</td>
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<tr>
<td>Shield America Brochure</td>
<td>shield-america-brochure.pdf</td>
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<tr>
<td>Human Smuggling Controlled Delivery Matrix Chart</td>
<td>Human Smuggling Controlled Delivery Matrix Chart</td>
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<tr>
<td>Mandatory Tracking Requirements Form</td>
<td>Mandatory Tracking Requirements.pdf</td>
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<tr>
<td>Traffic Stop Checklist</td>
<td>Traffic Stop Checklist.pdf</td>
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<tr>
<td>HS HT Handout (Legal)</td>
<td>3 HS HT Handout.pdf</td>
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</table>
SUBMITTED BY:

- Date: 1/17/2017
- Primary HSI POC: [Redacted]
- Phone Number: 281-619-1749
- Email Address: [Redacted]
- Division/Group: Div 1 / HSIG

EVENT DESCRIPTION:

- Event Name: HPD Homicide / VICE Training
- Event Date: 1/17/2017 through 1/17/2017
- Event Time: 10:30 a.m.
- Event Location: HPD Academy, Houston, TX
- Number of Presenter(s)/Speaker(s): 1
- Number in Attendance: 30
HPD Homicide and VICE Detectives -
- Topic(s) Covered: Human Trafficking / Human Smuggling differences and the working relationship between HPD Human Trafficking/Smuggling Unit and HSI.

HEADQUARTERS ROLE: (if any) none

MEDIA COVERAGE: (if any) none

POINT(S) OF CONTACT:

- Name and Title of Presenter(s): [Redacted]
- Presenter(s) Phone Number: 281-619-7746
- Presenter(s) Email Address: [Redacted]
Forging a New Legacy

Homeland Security Investigations

Crimes: Human Smuggling and Human Trafficking

ICE HSI Special Agent Training

ICE Academy
Terminal Performance Objective

Given a set of case related facts indicating human smuggling or human trafficking, determine investigative and victim-support actions, in accordance with legal requirements, agency policy, and agency resources.
Enabling Performance Objectives

- Explain the elements of human smuggling crimes
- Define human smuggling and related terms and identify indicators to establish violations of human smuggling statutes
- Identify the different methods used by ASOs to bring aliens into the U.S., including by land, sea and air, both through the POEs and by crossing the borders at other than POEs
- Determine investigative approaches and actions to investigate human smuggling cases
- Explain the elements of human trafficking crimes, and define the differences between sex trafficking and labor trafficking/forced labor
Enabling Performance Objectives (cont’d)

- Define human trafficking and identify indicators to establish violations of human trafficking statutes.
- Identify common methods of operation utilized by human trafficking organizations.
- Identify investigative approaches and actions to investigate each type of human trafficking case.
- Identify various programs within HSI designated to provide assistance to identified victims of human trafficking.
- Handle an alien smuggling load from initial encounter to writing the criminal complaint.
Why we must stop it...

- Thousands of people trafficked to the U.S. Coerced into prostitution, domestic servitude, or forced labor. You can save lives!
Review of the Past

- Human smuggling: Surreptitious entry people into the U.S. and deliberately evading immigration laws
- Human trafficking: Sex trafficking (a commercial sex act induced by force, fraud, coercion, or when the person is under age 18)
- Recruiting, harboring, transporting, provisioning, obtaining, advertising, maintaining, patronizing or soliciting of a person for labor or services by force, fraud, coercion, subjection to involuntary servitude, peonage, debt bondage, or slavery
- Exploitation-based
Main Ideas

- Human smuggling – Surreptitious entry of people into the U.S., facilitated by a third party, involving deliberate evasion of immigration laws. Smuggled aliens: Critical as material witnesses. May be placed in parole status. After testimony, generally placed in removal proceedings.
Main Ideas (cont’d)

- Human trafficking – The recruitment, harboring, transportation, provision, obtaining, advertising, maintaining, patronizing or soliciting of a person, by means of threat or use of force, fraud, or coercion, subjecting victims to involuntary servitude, peonage, debt bondage, or slavery for the purpose of sexual exploitation or forced labor

Victims of trafficking Must be protected and may also be witnesses for Continued Presence
May be eligible for a T or U visa
Homeland Security Investigations (HSI)

Advanced Organizer

Crimes Enforced by HSI

General Crimes
- Terrorism Crimes
- Controlled Substances
- Money Laundering
- Forfeiture Law
- Child Exploitation

Customs Crimes
- Export Crimes
- MDLEA
- Aviation Smuggling
- Financial Crimes
- Commercial Fraud

Immigration Crimes
- Human Smuggling
- Human Trafficking
- Identity and Benefit Fraud
- Worksite Enforcement
- Gang Crimes
Agenda (1 of 2)

- Elements of human smuggling crimes and investigations
- Definition and indicators of human smuggling violations
- Methods used for human smuggling and investigative approaches
- Demonstration and practice with case examples
Agenda (2 of 2)

- Elements of human trafficking crimes and investigations
  - Definition and indicators of human trafficking violations
  - Methods used for human trafficking and investigative approaches
  - Providing assistance to victims
  - Handling an alien smuggling load
  - Demonstration and practice with case examples
Human Smuggling Crimes


- 8 U.S.C. § 1324(a)(2)
- 8 U.S.C. § 1324a
- 8 U.S.C. § 1325
- 8 U.S.C. § 1326
- 8 U.S.C. § 1327

It is a crime to bring or attempt to bring an alien to the United States at an unauthorized location.

See Example in Student Guide

Transporting an alien in furtherance of the alien’s illegal presence in the U.S.

See Example in Student Guide

Concealing, harboring, or shielding illegal aliens.

See Example in Student Guide

Encouraging or inducing an alien to come to, enter, or reside in the U.S. in violation of law.

See Example in Student Guide
8 U.S.C. § 1324(a)(1)(A)(v)(I) and (II)

Conspiring to commit alien smuggling, aiding or abetting alien smuggling.
8 U.S.C. § 1324(a)(2)

Bringing or attempting to bring an alien to the U.S. knowing or in reckless disregard of the fact that the alien has not received prior official authorization to come to, enter, or reside in the United States.

See Example in Student Guide
8 U.S.C. § 1327

Aiding or assisting inadmissible aliens to enter the U.S., or conniving or conspiring with any person(s) to do so.

See Example in Student Guide
8 U.S.C. § 1328

Import an alien for prostitution or an immoral purpose.

See Example in Student Guide
8 U.S.C. § 1324(a)(3)

Knowingly hiring at least 10 smuggled aliens within a 12-month period.

See Example in Student Guide
Hiring, recruiting, or referring for a fee, an illegal alien for employment.

See Example in Student Guide
Creating a business to evade immigration laws.

See Example in Student Guide
8 U.S.C. § 1325(c)

Knowingly entering into marriage for the purpose of evading any provision of the immigration laws.

See Example in Student Guide
8 U.S.C. § 1325

Improper entry by alien
Improper time or place
Avoidance of examination or
inspection
Misrepresentation and concealment of facts

See Examples in Student Guide
8 U.S.C. § 1326

An alien who was denied admission, excluded, deported, or removed enters or attempts to enter or is found in the U.S.

See Example in Student Guide
Demonstration

1. Frank Jones owns and operates a large ranch in west Texas. In March, he travelled to Nuevo Laredo, Mexico and displayed several posters on poles throughout the city that said the following...Did Jones commit any crime(s) and, if so, which crime(s)? Did Jose and Tom commit any crime(s) and, if so, which crime(s)? Did Javier and Mateo commit any crime(s) and, if so, which crime(s)?
2. Assume that Jose and Tom took Javier and Mateo to a “safe house,” managed by Mike, to lay low for a while. After a week, Mike instructed Hank to drive Javier and Mateo to the Jones ranch so they could get the job promised on the posters. Did Mike commit any crime(s) and, if so, which crime(s)? Did Hank commit any crime(s) and, if so, which crime(s)?
Definition of Human Smuggling

- Surreptitious entry of people into the U.S., facilitated by a third party, involving deliberate evasion of immigration laws. May be motivated by profit, religion, politics, or family interest. Statutes governing offense contained within 8 U.S.C. § 1324
Human Smuggling Terms

- ASOPolloCoyote or polleroGuideDriverPoll o listBajadoresDrop house or stash house
- Pocket trashMaterial witnessesOTMSnakeh eadLoadLoad vehicleSponsorReporti ng party

Terms and Definitions in Student Guide
Human Smuggling Investigatory Leads

- Information developed through local LEAs/Aliens revealing they were smuggled/Referrals from DHS entities upon discovery of smuggled aliens/Informants and tipsters/Other ICE investigations or enforcement activities/NGOs and advocacy groups/Relatives or associates of aliens or victims
Indicators of Human Smuggling

- Is subject in possession of ID and travel documents? Was subject coached on what to say to law enforcement and immigration officials? Is subject’s salary being garnished to pay smuggling fee? Does subject have freedom of movement? Has subject or family been threatened with harm for refusing to pay smuggling fees? Has subject been threatened with deportation or law enforcement action? Can subject freely contact friends or family?
Investigation, Prosecutorial Focus, Penalties

- Investigations focused on identifying, disrupting criminal organizations involved in bringing in, transporting, harboring illegal aliens. Sentences typical: 1 to 5 years. Much heavier sentences for repeat offenders or if crime results in severe injury or death.
Human Smuggling Organizations (1 of 4)

- Organizational heads or bosses typically reside outside U.S.
- Arrangers/recruiters typically reside outside U.S.
- Seek/gather alien clients for the ASOM
- May require prepayment of smuggling fees
- Guides typically work along the border
- Lead groups across the border to stash/drop house
Human Smuggling Organizations (2 of 4)

- Drivers: Transport illegal aliens by car, van, bus or tractor trailer.
- Facilitators: Perform tasks that require legal immigration status and/or a clean police record.
- Rent: Drop houses or vehicles in U.S. for use by ASO.
- Obtain: Cell phones for organization members.
- Most: Have legal status in U.S.; many are female.
- Recover: Seized vehicles from impound lots.
- Transport funds to organization members in jail and act as secure communication link.
Human Smuggling Organizations (3 of 4)

- Stash or drop house operation. Detains aliens in U.S. pending receipt of smuggling fees. After fees paid, ASO arranges to transport aliens to final U.S. destination. Enforcers prevent aliens from leaving the drop house prior to the payment of smuggling fees. Prevent rip off crews or other alien smugglers from stealing aliens. Usually possess firearms or other weapons.
Human Smuggling Organizations (4 of 4)

- Money collectors work with drop house operators to coordinate payment of smuggling fees. Collections are commonly handled through money transmitters or by electronic fund transfers. Usually trusted members of the organization and can be the drop house operators or mid-level managers.
Southern Border Smuggling

- Nationals from Central and South America as well as Asia, Africa, the Middle East, Eastern Europe and the Balkans may arrive in Central or South America and travel through Mexico to the U.S. ASOs may have members from different nationalities who handle local coordination with Mexican smuggling organizations. The Mexican ASO boss often resides outside U.S. to avoid prosecution. The boss obtains aliens from recruiters or purchases from subcontractor recruiters.
Southern Border Smuggling (cont’d)

- Guide leads aliens across the border via trains, swimming, using hidden compartments in vehicles, walking through desert.
Drivers transport aliens to drop house. Smuggler at drop house collects name, phone number of each alien's sponsor to arrange for alien's smuggling fees. Fees vary, based in part on distance. Alien is to be transported fees usually transmitted via money remittance (Western Union, Moneygram). When fee is paid, drop house operator is informed and alien's transportation to final destination arranged.
Hostage-Taking Investigations

- Alien loads sometimes targeted by border bandits or “bajadores” Steal ASOs' alien extortion money from aliens by force or intimidation Usually fees substantially Cases usually discovered through local LEA or contact from alien’s relative HSI agents interview arrange interview of reporting party Contact duty agent for AOR where victim is being held
Hostage-Taking Investigations (cont’d)

- Consensually monitored phone calls establish proof of life and threats if smuggling fees are not paid.
Northern Border Smuggling

- Canada’s immigration and visitation rules make it popular for aliens from outside the Western hemisphere (Koreans, Indians, Chinese) as well as Central and South Americans.
Northern Border Smuggling (cont’d)

Smugglers often landed immigrants (similar to LPR) or naturalized Canadian citizens Often from same nationality/ethnic background as aliens being smuggled Aliens usually contact recruiters in source country
Recruiters arrange for transport to Canada as tourists or through use of fraudulent documents, either singly or in small groups. Aliens placed into drop houses on Canadian side, then guided across border in small groups. In U.S. picked up by drivers. Driven to final destination or to airport for flight. Organizations do not always use stash houses in U.S. Most smuggled aliens pay fees before trip or are known to smuggler.
Typical View of U.S. – Canadian Border
Air Smuggling

- Most air smuggling done using commercial airlines entering at international airports. Private plane smuggling relatively rare. Smugglers get travel docs through fraudulent visa applications or photo-subbed or counterfeit passports. May use legitimate passports carried by imposters. Aliens sometimes moved from native countries to transit countries enroute to U.S to obscure place of origin or reduce attention from CBP.
Air Smuggling (cont’d)

• Smuggling routes vary by nationality and the ASO’s previous success. Aliens may use multiple passports along route. Corrupt foreign officials may facilitate alien’s entry into transit countries. Legitimate travel docs obtained by fraud or corruption. Aliens are often moved in small groups though loads may actually consist of up to 20 people. May pose as students, tour groups to facilitate entry into transit countries.
Marine Smuggling

- Open boat smuggling used by aliens from numerous source countries—Cubans, Dominicans, Haitians often attempt on smaller vessels, some little more than rafts
Chinese in hidden compartments on legitimate freighters with crew’s knowledge or brought on ship for purpose landing them in U.S. Most larger ships off-load aliens to smaller vessels. ASOs usually use larger boats, but many still lost at sea.
Container Smuggling

- Rarely or no longer observed at U.S. ports. Still a favorite method utilized by ASOs in other ports around the world. Containers are loaded in high risk ports in Africa and Asia for shipping to ports in Europe. Aliens and survival supplies loaded into containers at off-site warehouses. Supplies are loaded into the container. Container is moved to port and placed on a ship. Container is transported via fabricated ship and consignee to the U.S.
Investigative Approach for Container Smuggling

- Interview and search aliens to identify enforcers and interview crew members and captain port for co-conspirators. Obtain and review shipping documents and container for evidence.
Investigative Approach: Vehicle Stop

Vehicle suspected of smuggling aliens is stopped:
Determine reason for vehicle stop from local LEA
Interview aliens individually, determine who has been subject of encounters with ICE
Investigative Approach: Vehicle Stop (cont’d)

Vehicle suspected of smuggling aliens is stopped: Search each person for indicators such as unusual amounts of cash, documents, pocket trash, etc. Compare statements to identify who is most likely to cooperate, who is most likely to be smuggler. Determine possibility of conducting controlled delivery of aliens in accordance with policy.
Investigative Approach: Material Witnesses

- Interview smuggled aliens to determine potential for use as material witness. Conduct follow-up interviews to determine: If they can testify to the elements of crime and identify principals. Level of information and cooperation. Credibility to prosecutor and jury. Coordinate with AUSA to seek material witness warrant if witness must be detained during prosecution.
Homeland Security Investigations (HSI)

Drop House Investigation

- Determine who owns or leases location

Phoenix metro area drop house map – March 2003 to March 2007
Pollo Lists

- Look for pollo lists indicating dates, times, amounts that may indicate transport of aliens and payments
Cell Phones and Other Evidence

- Obtain consent to cellbrite phones in possession of subjects. If entry to stash house was done via search warrant, make sure to include cellphones within scope of items in warrant.
Criminal Charges and Evidence

- Document interviews for criminal charges following procedures for taking sworn statement
  - Provide Miranda warnings
  - Sworn statement on I-263B
  - Follow procedures for seizing, documenting evidence
  - Legal authority
  - Chain of custody
  - Authority to seize

- Transport procedures
  - Documenting in ICM (DHS Form 6051S)
Controlled Delivery of Undocumented Aliens

- Must be conducted per HSI policy, March 23, 2012
- Coordinate with CBP in accordance with CBP/ICE Memorandum of Understanding Alien transport operation procedures include:
  - SAC authorization in consultation with local USAO Safety is paramount
  - Any UDAs in physical distress or danger should be removed as soon as practical
  - Transport to minimize risk to all participants
  - Any maritime component requires additional approval
Homeland Security Investigations (HSI)

Controlled Delivery of Undocumented Aliens (2 of 3)

- Appropriate surveillance throughout operation Deconfliction with federal, state, local LEAs and coordination through HSI Attaché for any undercover activities in foreign countries. USAOs in affected areas must approve investigations involving release of UDAs. No aliens from special interest countries or criminal aliens transported internationally or released without approval.

See Mandatory Tracking Requirements form in Student Guide
Homeland Security Investigations (HSI)

Controlled Delivery of Undocumented Aliens
(3 of 3)

• SAC offices responsible for tracking and monitoring all released UDAs until conclusion of investigation. Any released UDAs arrested and/or convicted of either a felony or a misdemeanor will be processed for removal. Comprehensive subject record for all released UDAs to be entered in ICM.
Homeland Security Investigations (HSI)
Approval Guidance for Controlled Delivery of Aliens

Approval Guidance Chart in Student Guide
HSI Drop Houses

- May be purchased or rented for undercover operation, with appropriate approvals. Audio/video surveillance in common areas of house. OPLA/AUSA consultation on REP in non-common areas. UDAs held at drop house no longer than [redacted] hours, absent exigent circumstances. Where possible, unrelated UDAs separated by gender and unaccompanied alien children removed and transferred to care of HHS. Family groups permitted to remain together.
HSI Drop Houses (cont’d)

- UDAs not held against their will. If UDAs depart, surveillance team is to apprehend them. Drop house must be secure, meet local building and safety standards. Operation attempts to identify all individuals paying smuggling fees for UDAs. SAC coordinates with local LEA and CBP. Criminal aliens...
Materials for AUSA

- All reports, statements, list of evidence, witness statements, surveillance reports, Affidavit prepared with details on how crime was identified, how the evidence supports it, results of enforcement operation. Coordinate with AUSA for preparation of criminal complaint or indictment.
18 U.S.C. § 1583

Force someone into involuntary servitude or slavery.
18 U.S.C. § 1584

Sell someone into involuntary servitude, and interfere with the enforcement of this section of law.

See Example in Student Guide
18 U.S.C. § 1589

Force someone into labor or to receive financial benefits from forced labor.

See Example in Student Guide
18 U.S.C. § 1581

Force someone into peonage and obstruct enforcement of this section of law.

See Example in Student Guide
Seize or detain, threaten to kill or injure, a person to compel a third person or government to do or abstain from doing a specific act for the hostage to be released; conspire or attempt to take someone hostage.
18 U.S.C. § 1590

Trafficking with respect to peonage, slavery, involuntary servitude, or forced labor.

See Example in Student Guide
18 U.S.C. § 1593A

Financially benefit from peonage, slavery, and trafficking in persons.

See Example in Student Guide
18 U.S.C. § 1591

Sex trafficking of children by force, fraud, or coercion.
18 U.S.C. § 1592

Destroy, conceal, remove, confiscate, or possess someone’s passport of immigration documents in furtherance of trafficking, peonage, slavery, involuntary servitude, or forced labor.

See Example in Student Guide
Severe Forms of Human Trafficking

Defined in 22 U.S.C. § 7102 (8): Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age. The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
18 U.S.C. § 1594

- 18 U.S.C. § 1594(b) – It is a crime to conspire to violate 18 U.S.C. §§ 1581, 1583, 1589, 1590, and 1592.
- 18 U.S.C. § 1594(c) – It is a crime to conspire to violate 18 U.S.C. § 1591.

See Example in Student Guide
Demonstration

is a business man in Hong Kong. He frequently deals with customers who pay on credit, but are unable to honor their debt... What crime(s), if any, did commit?
Definition of Human Trafficking

The recruitment, harboring, transportation, provision, or obtaining of a person (regardless of citizenship or immigration status), by means of threat or use of force, fraud, or coercion, subjecting victims to involuntary servitude, peonage, debt bondage, or slavery for the purpose of sexual exploitation or forced labor.
Homeland Security Investigations (HSI)

Statutes Governing Human Trafficking Offense

Contained within: 18 USC §§ 1581-1594
The associated Mann Act statutes of 18 USC §§ 2421-2424
Title 8 USC § 1328, Importation and Harboring of Aliens for Immoral Purposes
Other: Trafficking Victims Protection Act of 2000 (TVPA) – Public Law 106-386
Trafficking Victims Protection Reauthorization Act of 2003 (TVPRA)
Trafficking Victims Protection Reauthorization Act of 2013 (TVPRA)
 Trafficking *Victims Protection Act of 2000 (TVPA)*

Public Law 106-386

- Human trafficking is the fastest growing source of profits for organized criminal enterprises worldwide.
- TVPA goals:
  - Prevent human trafficking overseas
  - Protect victims and help them rebuild their lives in the U.S.
  - With federal and state support
  - Prosecute traffickers of persons under stiff federal penalties
 Trafficking Victims Protection Reauthorization Act (TVPRA)


Victims can bring federal civil suit against trafficker for actual and punitive damages

Adds sex trafficking and forced labor to RICO offenses

2013 18 U.S.C. § 1597: Penalties for trafficker or employer confiscating an individual’s passport or identity documents – actual or purported
TVPRA 2013 provides for the following: In general, 18 USC Chapter 77, Peonage, Slavery, and Trafficking in Persons, is amended by adding at the end § 1597 – Unlawful Conduct with Respect to Immigration Documents Penalty – Whoever violates subsection (a) shall be fined under this title, imprisoned for not more than 1 year, or both Obstruction – Whoever obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be subject to the penalties described in subsection (b)."
Investigatory Leads

- Local law enforcement
- Aliens and their relatives
- Other DHS entities
- Informants
- Tipsters
- Other ICE investigations
- NGOs and organizations

Key source because of the community’s ability to build trust in local offices, establish relationships with NGOs

Be alert. Be strong. Be free.
Stop Human Trafficking

To reach a non-governmental, confidential help line

CALL TOLL-FREE, 24 HOURS:
1-888-3737-888

170+ languages

Or call 911 in an emergency
Indicators of Human Trafficking Include...

- Who has control of ID and travel docs? Are victim’s wages taken? Was victim recruited for one job, forced to perform another? Was victim forced to perform sexual acts? Does victim have freedom of movement, allowed to socialize, attend religious services, contact friends or family? Has victim or family been threatened with harm, deportation, or law enforcement action? Has victim been harmed or deprived of food, water, sleep, medical care, or other life necessities? Is victim a juvenile engaged in commercial sex?
Indicators of Human Trafficking Include...

- Heavy security at commercial establishments
- Victims live at worksite or quarters by guards
- Victims accompanied by trafficker (trafficker) when seeking medical care
- Untreated medical problems, malnutrition
- Signs of rape or sexual abuse
- Nervousness (especially if translation present)

Brochure in Student Guide
Elements that Constitute a Trafficking Victim

- Must contain an element of force, fraud, or coercion (actual, perceived, or implied), unless under 18 and involved in commercial sex acts
- Forced labor and/or exploitation
- Persons trafficked are victims
- Enslaved, subjected to limited movement or isolation, or had documents confiscated
- Need not involve the actual movement of victim
- No requirement to cross international border
- Person need not be actively involved in labor/services or commercial sex acts – must be “working”
Trafficking Organization Structure

- Recruiter – Uses ads, personal contacts, family sales to obtain victims in source countries
- Arranger/Coordinator – Facilitates acquisition of travel documents, fraudulent or legitimate, arranges transport to U.S. Receiving
- Co-conspirator – Receives victims in U.S., arranges staging locations, retrieves travel documents, reveals debt bondage, distributes or resells victims to business owners/managers
Transporter – Transports victims from harboring site to job site, between job sites, or on out-calls for prostitution.

Harboring/security – Maintains victims at harboring site, if not job site, prevents escape and freedom of movement, may double as transporter.

Business owner/manager – May employ victims in prostitution, agricultural, garment, or other industries, or be involved in domestic servitude for selves or others.
Victim-centered Philosophy and Investigative Priorities

- Protection of trafficked aliens is of equal importance with apprehension and prosecution of traffickers. Especially true in cases involving juveniles and sexual exploitation. HSI facilitates procurement of aid and victim services through social service agencies and NGOs. Includes assistance with applications for continued presence and other governmental aid. Engage cooperating NGOs consistent with policy.
Convert Reactive to Proactive Investigations

- Target suspected violators beyond the immediate reactive cases brought to HSI attention Liaison with other LEAs, HSI attaché offices
Prepare Case for AUSA

- Reports, statements, list of evidence, witness statements, surveillance reports, Affidavit with details on: How crime was identified, How the evidence supports it, Results of enforcement operation, Coordinate with AUSA for preparation of criminal complaint or indictment
Dealing with Trafficking Victims

- Most victims may not speak or understand English. An interpreter must be fluent in victim’s language and dialect. Victims may be afraid to speak to authorities, believe they will be held responsible. Fear of imprisonment, fear of harm to self or family. Reassure victims that their safety is HSI’s first priority. Use least-confining custody setting, minimize exposure to weapons, badges. Involve social service agencies from the outset.
Victims Encountered in Enforcement Actions

- In advance of enforcement action...Identify interpreters Identify NGOs to provide short- and long-term services to victims Bring only vetted NGOs on-site for processing.
Victims Encountered in Enforcement Actions (cont’d)

- During enforcement action...Have all potential victims gather personal belongings (clothes, papers, medications, money, hygiene items) Tag bags with victim’s name and location from which belongings were recovered. If multiple sites, assign/label each potential victim with identification tag (colored wristbands, etc.) to indicate arrest location and avoid confusion.
Victims Encountered in Enforcement Actions (cont’d)

- Following enforcement action…Conduct initial interviews – identify possible targets and identify possible victims. Separate groups – potential victims, offenders, enforcers – and process groups separately. Transport victims to off-site location ASAP. Work with HSI VAS – have NGOs on site. Arrange meetings with victims preferably in a group setting. Explain situation and potential benefits. Health screening is necessary.
Homeland Security Investigations (HSI)

Assistance for Smuggled Aliens and Victims of Trafficking

Smuggled Aliens
Material witnesses
May be paroled, released into U.S. for short time
After testimony, placed in removal proceedings

Trafficking Victims
HSI's victim-centered approach:
subject is first a victim to be protected, may also be a witness
Eligible by statute for Continued Presence
May be eligible for T or U visa if cooperating with prosecution
Authorities Requiring Victims' Rights and Services

- Victims’ Rights and Restitution Act (VRRA), 42 U.S.C. § 10607
  Includes mandatory services

- Crime Victims’ Rights Act (CVRA), 18 U.S.C. § 3771
  Includes court-enforceable rights

- Other statutes and rules of criminal procedure

- Attorney General Guidelines for Victim and Witness Assistance
Authorities Requiring Victims' Rights and Services

- Victims’ Rights and Restitution Act (VRRA), 42 U.S.C. § 10607
- Victims' Rights Act (CVRA), 18 U.S.C. § 3771
- Other standards of criminal procedure
- ICE Directive 1007.1
- ICE Directive 1007.1 in Student Guide

ICE Directive 1007.1 in Student Guide
Definitions of Victim

- VRRA victim – “a person that has suffered direct physical, emotional, or pecuniary harm as a result of the commission of a crime. . . .” CVRA victim – “a person directly and proximately harmed as a result of the commission of a federal offense…”
- Direct and proximate harm – Based on analysis of harm allegedly suffered and the crime alleged to have caused the harm
- Harm a direct consequence of the crime CVRA: harm must have been reasonably foreseeable result of charged offense
ICE Victim Assistance Program Definitions

- Victim – “a person directly or proximately harmed as a result of the commission of a federal offense” May be culpable for violations or crimes other than the crime being investigated. Victims' definition may include: Victims of trafficking may be considered victims for purposes of prosecution, despite legal culpability for ancillary immigration or prostitution offenses. Criminal suspects subjected to excessive force by law enforcement officers. Inmates who are victims of crime during incarceration.

Directive 1007.1 in Student Guide
ICE VAP Definitions (cont’d)

- Witness – a person who has information, knowledge, or evidence concerning a crime and provides information to an LEAA victim of a crime may become a witness and a witness who is threatened may become a victim. Directive does not cover CIs or undocumented sources of information.
Special Victim Populations

Federal statutory provisions for services for victims of: Domestic violence, stalking, or sexual assault Child abuse Identity theft Human trafficking

Mandatory reporting of any suspected child abuse or exploitation under state and federal law – responsibility of individual SAs, with sanctions for failing to report.
Identifying Victims

- VRRA: Responsibilities to victims begin ASAP after detection of a crime (without interfering in investigation) – generally at opening of criminal investigation.

- CRVA: Rights attach when criminal proceedings initiated by complaint, information, or indictment.

- ICM codes: Cases with crime victims – I6DSubject record for non-suspect / trafficking victim – HT
Services and Rights of Victims

Responsible official shall provide identified victims with information about available services:

- Referral to receive emergency medical or social services
- Availability of restitution or other relief that victim may be entitled to
- Public and private programs for counseling, treatment, other support
- Reasonable protection – not a service per se but a required consideration
Special Victim Populations

- Victims of domestic violence, stalking, sexual assault/immigrant victims may petition for immigration protections, relief, assistance. Investigating agency can pay for forensic sexual assault exam (with no requirement to cooperate with LEA).
- Victims of child abuse.
- Forensic interview by HSI Forensic Interview Specialist.
- Age-appropriate support services.
- Privacy protection for child victims and witnesses – names, other identifiers not included in court documents, public records.
Special Victim Populations (cont’d)

- Victims of identity theft: If victim requests, SAs shall assist in notifying creditors and employers of identity theft.
- Victims of human trafficking: Victims of severe form of trafficking in persons, as identified by federal LEA, eligible for benefits, services Employment authorization and parole without regard to immigration status. May be eligible for public benefits like refugee alien.
- Shall not be detained in facilities inappropriate to their status as crime victims.
Coordinating Victim Services

- Case agent or Victim Assistance Specialist (VAS) or Victim Assistance Coordinator (VAC) coordinates victim services as needed. During investigation, investigating agency responsible for referring victim to services. When investigation transferred to prosecutorial entity or charges are filed, prosecutorial entity responsible for service referrals.
Case Agent Responsibilities

With or without victim's request, case agents:

1. Ensure victim's property is maintained in good condition and returned as soon as it is no longer needed as evidence.
2. Provide information regarding prohibition against intimidation.
3. Arrange for reasonable protection from suspected offender.
4. Discuss temporary protective measures – restraining orders, relocation, revocation of defendant's bond.
Focus on Victim

- Investigation is secondary to rescue of victim. Coordinate with Victim Assistance Specialist (VAS) or Victim Assistance Coordinator (VAC) for forensic interview of victim. Coordinate with local NGOs and victim service providers.
Continued Presence (CP)

- Provided statutorily under Trafficking Victims Protection Act. LEO makes initial determination if individual is victim of a severe form of human trafficking. Federal LEOs authorized to submit CP applications. Submit as soon as victim identified. Coordinate with SAC Victim Assistance Specialist Approved by HSI Law Enforcement Parole Branch.
Continued Presence (CP) (cont’d)

- Granted for up to two-years, with extension of up to two years. Victim's cooperation with LEA not required for eligibility but other benefits may be available to cooperating witnesses. Cooperation with LEA not required for benefits if victim is minor. Alien with CP issued employment authorization document and I-94.

CP Brochure in Student Guide
T Visa and U Visa

T Visa (5,000 annual cap) For victims of severe form of human trafficking and qualifying family. Can remain in U.S. up to 4 years. Can lead to LPR status. Coordinated by VASCertification of application (Form I-914, Supplement B) by LEA.

U Visa (10,000 annual cap) For victims of certain serious crimes and qualifying family. Specified crimes, occurring in U.S., listed on I-918. Suffered substantial physical or mental abuse. Victim possesses information on the crime. LEA certifies victim helpful in investigation or prosecution.
Segregation of Detained Aliens

• Separate victims and witnesses from alien suspects during all transport, interviews, and processing. Transport suspects and witnesses in accordance with HSI policy.
• Separate males from females, juveniles from unrelated adults.
• Ensure that suspects are detained in separate holding cell from potential witnesses, victims.
State / Local LEA Encounter with Smuggling

- State, local LEAs encounter individuals using conveyances to smuggle illegal aliens into and through U.S. Many encounters traffic-related others in response to domestic-violence calls, noise disturbance calls, etc.
HSI Response to Local / State LEA Traffic Stop of Alien Smuggling Load

• Determine from LEA: Nature and location of traffic stop Number, gender of individuals encountered If minors are present If language barriers or if unable to verify identity or immigration documents Determine number of agents to respond to call Based on SAC policy and availability of agents Minimum two agents for van or smaller Additional agents required for tractor trailer or larger
Traffic Stop Procedures (1 of 3)

- Park safely, activate lights
- Contact Sector Officer
- Obtain LEA officer information, copy of police report
- Determine if driver will be arrested
- Run license plate and VIN
- Contain driver, vehicle keys, separate from load
- Determine driver's alienage/removability

<table>
<thead>
<tr>
<th>Traffic Stop Checklist in Student Guide</th>
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</thead>
<tbody>
<tr>
<td>Park safely along busy roads</td>
</tr>
<tr>
<td>Activate vehicle lights</td>
</tr>
<tr>
<td>Contact Sector Officer and notify LEA</td>
</tr>
<tr>
<td>Obtain officer's identifying information</td>
</tr>
<tr>
<td>Obtain driver's name, address, date of</td>
</tr>
<tr>
<td>birth, social security number, and</td>
</tr>
<tr>
<td>telephone number</td>
</tr>
<tr>
<td>Run the license plate and VIN of target</td>
</tr>
<tr>
<td>vehicle through national criminal</td>
</tr>
<tr>
<td>database to verify the vehicle's</td>
</tr>
<tr>
<td>registration and owner</td>
</tr>
<tr>
<td>Inspect the vehicle's interior</td>
</tr>
<tr>
<td>and exterior for evidence of criminal</td>
</tr>
<tr>
<td>activity or illegal activity</td>
</tr>
<tr>
<td>Determine if driver needs medical</td>
</tr>
<tr>
<td>assistance and if so, contact</td>
</tr>
<tr>
<td>emergency medical</td>
</tr>
<tr>
<td>services.</td>
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<tr>
<td>Check for items in the car of the</td>
</tr>
<tr>
<td>driver (e.g., weapons, illegal</td>
</tr>
<tr>
<td>narcotics, contraband, or stolen</td>
</tr>
<tr>
<td>property)</td>
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<tr>
<td>Search the vehicle's interior</td>
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<tr>
<td>for evidence of criminal activity</td>
</tr>
<tr>
<td>and illegal activity</td>
</tr>
<tr>
<td>Search the vehicle's exterior</td>
</tr>
<tr>
<td>for evidence of criminal activity</td>
</tr>
<tr>
<td>and illegal activity</td>
</tr>
<tr>
<td>Contact Sector Officer to secure</td>
</tr>
<tr>
<td>vehicle if necessary</td>
</tr>
<tr>
<td>Contact Sector Officer with</td>
</tr>
<tr>
<td>transportation document</td>
</tr>
<tr>
<td>and any children in the vehicle</td>
</tr>
<tr>
<td>Contact ICE if the driver appears</td>
</tr>
<tr>
<td>to be unaccompanied and the</td>
</tr>
<tr>
<td>vehicle is abandoned</td>
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</tbody>
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Homeland Security Investigations (HSI)
Traffic Stop Procedures (2 of 3)

- Briefly determine alienage, removability of aliens. Determine if anyone needs medical attention. If so, contact emergency medical services, accompany alien to hospital, remain until alien is released. Control aliens (hands on head). Extract from vehicle one at a time. Determine alienage, removability of each alien. Use proper defensive tactics.
Traffic Stop Procedures (3 of 3)

- Perform consent search or inventory search
- Consent to Search, Form 73-005
- Vehicle/Vessel/Aircraft Inventory and Receipt, Form 58
- Conduct search of vehicle when safe, convenient
- Look for pocket trash, vehicle registration
- Contact Sector to tow or seize vehicle or have state/localstow
- Contact Sector with transport information
- Contact ERO immediately if unaccompanied minors encountered
Transport for EAGLE Processing

- Transport persons determined to be involved in smuggling scheme separately from aliens being smuggled, transport unaccompanied minors separately from other smuggled aliens, if feasible, transport females separately from males, if feasible, transport family members together, if feasible and if not involved in smuggling scheme.
Interviewing

- If prosecution of smugglers is contemplated, give Miranda warning before conducting interview. Interview smuggled aliens to determine who may serve as material witnesses. Provide interview information and evidence to AUSA for acceptance of prosecution.
Demonstration

- You get a tip from an informant regarding aliens being smuggled to a drop house in Mesa. Review the scenario and answer the question: What would be the appropriate responses to this situation? Which section(s) of law would be applicable?

Demonstration Scenario in Student Guide
Practice

1. Al Lien is a Canadian who has no right to be present in the United States. While in Rossland, Canada, he meets Baker, a U.S. citizen who is driving back to his home in Colville, Washington. Baker tells Al that he needs someone to help on his farm, and offers to pay Al. Al agrees. With what crime can Baker be charged?

Frank was paid to drive 14 illegal aliens across the border from Mexico into the United States. He does so between the ports of entry at Naco and Douglas, Arizona. Which criminal statute has Frank violated?
3. Dexter was previously deported from the United States in 2002. Without obtaining permission from the Attorney General to re-enter the United States, Dexter smuggles himself into the United States by hiding in the trunk of a car driven through the Nogales, Arizona port of entry. What crime has Dexter committed? Joey Piscatello has a dry cleaning business at which he employs six illegal alien workers from Honduras. When the six came to work for him, they were chained together, and remain chained to either the cleaning machines or to their cots in the back room when they are not working. He also threatens them with harming their relatives in Honduras if they try to escape or tell the authorities about their situation. What crime is Joey committing?
Practice (cont’d)

5. While executing a search warrant on a known drug dealer’s home, HSI SA’s found four women who were dressed in tattered clothes and had various bruises on their bodies. When questioned, the women stated they worked for the home owner. They further admitted to the SAs that they had come to the U.S. to visit the home owner’s sister, but ran out of money and borrowed some from the home owner. As a result, the home owner would not allow them to leave and told them they had to perform various chores at his home until their debts had been satisfied. With what crime can the home owner be charged?
Practice Scenarios

- Scenario 1: Local LEA encounters underage Korean girls in a raid on a brothel.
- Scenario 2: A woman reports smugglers are holding her brother hostage.

Review each scenario and answer the questions: What would be the appropriate responses to this situation? Which section(s) of law would be applicable?
Summary

- Human smuggling is bringing someone into the U.S., while deliberately evading immigration laws. Human trafficking is also bringing someone into the U.S., but it involves using force, fraud, or coercion.
Summary (cont’d)

- Distinctions between human smuggling and human trafficking: ASO structure and operations vary on southern, northern U.S. borders. HSI investigative approaches include: Undercover operations, use of confidential informants, cooperation with NGOs, as well as local law enforcement. Rescue of victims is a top priority. Procedures for handling alien smuggling load.
Protecting the Borders Against Illicit Trade, Travel, and Finance
Forging a New Legacy

Homeland Security Investigations
Human Smuggling and Trafficking Task Force Officer Training
Enabling Performance Objectives

- Understand the elements of human smuggling and human trafficking criminal violations and be able to distinguish between them.
Agenda

- Overview of human smuggling
- Investigative considerations
- Investigative resources
Mission

- Dismantle the global criminal infrastructure engaged in human smuggling and trafficking by making full use of HSI’s authorities and expertise, collaborating with U.S., foreign, and private industry partners to attack these networks worldwide. Identify human smuggling and trafficking organizations; prioritize which organization poses the greatest threat to national security and public safety; and then eliminate the organization’s ability to function through close coordination with field office investigations.
What is Human Smuggling?

- The importation of people into the U.S. involving deliberate evasion of immigration laws. This offense includes bringing illegal aliens into the U.S., as well as the unlawful transportation and harboring of aliens already in the U.S.

- Crime against a border
- Transportation based
- Requires border crossing
- Voluntary
Homeland Security Investigations (HSI)

Human Smuggling Statute

- 8 U.S.C. 1324 Bring illegal aliens to the U.S. Transporting or Harboring illegal aliens within the U.S. Encouraging or inducing aliens to enter the U.S. Conspiracy to commit any of the preceding acts
There are 3 methods of human smuggling:
A typical human smuggling organization consists of some or all of the following components depending on the size of the organization:
Threat Analysis: Criminal Travel Networks
Human smuggling may involve elements of violence such as hostage taking, kidnapping, extortion, physical and sexual assault. The presence of these aggravating factors alone do not constitute human trafficking.

Smuggling and trafficking are not synonymous, but they can be connected.
Human Trafficking

- Human Trafficking is exploitation based. Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. Immigration status or citizenship is not an element of human trafficking.
## Smuggling vs Trafficking

<table>
<thead>
<tr>
<th>Smuggling</th>
<th>Trafficking</th>
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<tbody>
<tr>
<td>Crime against a border</td>
<td>Crime against a person</td>
</tr>
<tr>
<td>Transportation based</td>
<td>Exploitation based</td>
</tr>
<tr>
<td>Requires border crossing</td>
<td>No border crossing required</td>
</tr>
<tr>
<td>Voluntary</td>
<td>Involuntary</td>
</tr>
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</table>
ICE Trafficking in Persons Strategy based upon the foundation of Protection, Prevention, Prosecution & Partnership

- Victim-Centered Approach
- Identifying and Seizing
- Assets
- Forfeiture and Restitution
- Human Trafficking Task Forces
- Anti-Trafficking Coordination Teams
# Investigative and Prosecutorial Considerations

<table>
<thead>
<tr>
<th>Determining Smuggling V. Trafficking</th>
<th>Complex and Resource Intensive Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifying Victims per Federal Standard</td>
<td>Obtaining Appropriate Victim Services</td>
</tr>
<tr>
<td>Available Immigration Benefits</td>
<td>Victim Cooperation</td>
</tr>
<tr>
<td>Identifying Targets</td>
<td>Lack of Previous Prosecutions</td>
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<tr>
<td>Forced Labor</td>
<td>Language and Cultural Barriers</td>
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</table>
## PENALTIES

<table>
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<tr>
<th>FORCED LABOR</th>
<th>SEX TRAFFICKING</th>
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<tbody>
<tr>
<td>Maximum sentence of 20 years and up to life if the victim was subjected to any form of sexual abuse during the forced labor.</td>
<td>Minimum mandatory sentence of 10 years imprisonment, 15 years if the victim was a minor.</td>
</tr>
</tbody>
</table>
Human Trafficking Training

- HSI and FLETC added human trafficking as a key topic to include in the State and Local Law Enforcement Training Symposiums. HSI provides four hour blocks of instruction for each class. Advanced Human Smuggling/Human Trafficking Training Program FLETC ICE Academy, HSI Training Division 56 hour training program. For veteran HSI Special Agents and Selected federal, state and local agents and officers.
Anti-Trafficking Coordination Teams (ACTTeams)
ACTTeams bring federal agents and investigators together with federal prosecutors from United States Attorney’s Offices to implement a coordinated plan to develop significant federal human trafficking investigations and prosecutions.

<table>
<thead>
<tr>
<th>ACTTeam Participants</th>
<th>Phase II of the ACTTeams</th>
</tr>
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<tbody>
<tr>
<td>HSIFBIDO L’s Wage and Hour Division</td>
<td>District of Minnesota/HSI St Paul</td>
</tr>
<tr>
<td>DOL’s Office of the Inspector General</td>
<td>District of Main/HSI Boston</td>
</tr>
<tr>
<td>US Attorney’s Office</td>
<td>District of New Jersey/HSI Newark</td>
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<tr>
<td></td>
<td>District of Oregon/HSI Seattle Northern</td>
</tr>
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<td></td>
<td>District of Ohio/HSI Detroit</td>
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<tr>
<td></td>
<td>Eastern District of California/HSI San Francisco</td>
</tr>
</tbody>
</table>
Resources

- DHS Human Smuggling Cell (HSC) Human Smuggling and Trafficking Center (HSTC)
- ICE Office of Principal Legal Advisor (OPLA), HSI Embedded Attorneys Web resources
Web Resources

- ICEHumanTrafficking.HelpDesk@dhs.gov
- BlueCampaign@dhs.gov
- www.dhs.gov/humantrafficking
- www.ICE.govHSTC@state.gov
- www.FLETC.gov
Add Case Summary and AOR Specific Slides here
Add Local Contact info for Human Trafficking/Smuggling
Questions?
June 22, 2018

Message from Secretary Nielsen on Affording Congress an Opportunity to Address Family Separation

As many of you are aware, we are in the midst of an illegal immigration crisis on our southern border that has been fueled by a decades-long failure to fully enforce our nation’s immigration laws. While DHS - and the full administration - has worked to ensure no one is exempt from the consequences of violating our laws, there has been significant misinformation about our efforts. I want to give you the facts, and also thank all of you who have continued to work diligently and professionally in this environment.

This week, President Trump signed the Executive Order Affording Congress an Opportunity to Address Family Separation. This Executive Order will permit alien families who have crossed our border illegally to remain together where appropriate and consistent with law and available resources. It also directs the Attorney General to appeal the Flores v. Reno decision with the federal courts to reopen its ruling that prevents us from detaining minors with parents. This is the court ruling that has limited the department’s ability to keep families together while adults are held accountable for illegally crossing our borders.

While this Executive Order will allow illegal alien families to remain together for a certain period without compromising border security, it will not solve the problem permanently. Congress must change the law to provide a lasting solution to family separation. As DHS employees know all too well, our laws also continue to be exploited by sex traffickers and human smugglers who take advantage of children to gain illegal entry into our country. To fix our broken immigration system, we are asking Congress to address at a minimum three major loopholes:

- First, we need to amend the 2008 Trafficking Victims Protection Reauthorization Act. This well-intentioned law results in unintentional consequences. Instead of protecting children from dangerous traffickers, this law encourages families to put their children in the hands of smugglers on a dangerous trek northward.
- Second, we need to reform our asylum laws to end the systemic abuse of our asylum system. Currently our asylum system fails to assist those who legitimately need it and is overrun with fraud. We are a country of compassion - a country of heart. We must fix the system so that those who truly need asylum can, in fact, receive it.
- Third, we need to amend the Flores Settlement Agreement which would allow for family detention during the removal process – and we need Congress to fund our ability to hold families together through the immigration process.
With these legislative changes, we can secure our borders and uphold our humanitarian ideals. These two missions should not be pitted against each other. We can accomplish both.

Our mission at DHS has always been difficult. None of us signed up for the easy jobs—we wanted to solve the big problems that face this country. It is our responsibility to keep Americans safe, to protect the homeland. Now more than ever we must rededicate ourselves to that mission and not be distracted by the noise.

I cannot tell you how proud I am of the work you all have done—and do every day—to defend this nation. I will continue to correct the record and stand up for the department. But in the meantime, you should know that I have your back as you do your jobs. We are all disappointed by the tenor of today’s public discourse, but you should keep your heads high and your efforts focused on the missions that brought us all into this department in the first place.

I will also continue to work diligently with Congress to close loopholes, secure our borders, and keep families together and will be sure to keep DHS employees informed as progress is made. Thank you for your steadfast support of the DHS mission and for your remarkable efforts to keep our nation safe and secure.

Best regards,

Kirstjen M. Nielsen
Secretary of Homeland Security

*With honor and integrity, we will safeguard the American people, our homeland, and our values.*
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Kirstjen M. Nielsen
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With honor and integrity, we will safeguard the American people, our homeland, and our values.
What do I do when I encounter an alien minor?

By law, if the alien minor is unaccompanied:

- ICE is responsible for notifying HHS within 48 hours of encountering an Unaccompanied Alien Child (UAC) anywhere within the U.S.
- All UAC are placed in Health and Human Services (HHS) Division of Unaccompanied Children’s Services (DUCS)
- Custody of all UAC must be transferred to HHS within 72 hours (coordinate through ERO Juvenile Coordinator)
- To notify HHS of a minor, e-mail and call orr_ducsintakes@: (202) 401-7451

By law, if the minor is trafficked or MAY be trafficked:

- Federal, state, and local law enforcement who encounter a minor who “may be a victim of trafficking” must notify HHS within 24 hours to facilitate interim assistance
- Contact: childtrafficking@ and (202) 20

**Important numbers**

Your ERO Juvenile coordinator is — her number is:

Your Victim Assistance Coordinator is . Her numbers are:
Human Trafficking: Tools and Methods for Successful Cyber Investigations Webinar
February 28, 2018 – 2p.m. EST
No Cost

Description: In the United States, there are upwards of 300,000 ads for sex posted every single day. The Internet has changed the game for how human traffickers operate, enabling them to advertise their victims easily, anonymously, and to a huge audience of buyers. This webinar, produced in partnership between Marinus Analytics and LexisNexis Risk Solutions will show the best tools and methods to make use of this huge amount of data to quickly and successfully find victims and traffickers. It will cover how the data from LexisNexis’ law enforcement solutions like Accurint Virtual Crime Center can take obtain hard-to-find information by linking 10,000 public records sources to national law enforcement data to find non-obvious connections and generate leads in conjunction with Traffic Jam, a suite of artificial intelligence tools for human trafficking investigations. Traffic Jam takes the massive amount of data online and turns it into actionable intelligence, reducing investigative analysis time for law enforcement by 50%, often taking days and even weeks of time off investigations. Traffic Jam’s latest new tool, FaceSearch, is the first facial recognition technology designed to stop human trafficking. With the millions of posts online, it has been nearly impossible to find runaway, missing, and foster children at scale. FaceSearch enables detectives to upload a photo of a victim from social media or a missing person’s poster, and within seconds determine if they’ve been sold online for sex. It has led to the rescue of numerous victims, and searches can be done in seconds. FaceSearch has an 88% success rate with finding positive matches of victims. Join this webinar to gain tips and tools to make the most out of your time, to effectively find victims of human trafficking and bring their exploiters to justice.
Human Trafficking: Tools and Methods for Successful Cyber Investigations

Wednesday, February 28, 2018 2:00 PM EDT
The Internet has changed how human traffickers operate, enabling them to advertise their victims easily, anonymously, and to a large audience of buyers through various dating and relationship sites and various classified advertising platforms. This webinar, produced in partnership between Marinus Analytics and LexisNexis® Risk Solutions, will show the best tools and methods to make use of this huge amount of data to find victims and traffickers successfully. It will cover how the data from LexisNexis law enforcement solutions like Accurint® Virtual Crime Center in conjunction with Traffic Jam’s artificial intelligence tools such as facial recognition through FaceSearch, can help rescue victims and complete searches in seconds. Join this webinar to gain tips and tools to make the most out of your time, to effectively find victims of human trafficking and bring their exploiters to justice.

Register Today

Register today for our upcoming webinar:

Introducing the Accurint Virtual Crime Center
Thursday, March 29, 2018 3:00 PM EDT

Register Today

Quick Links
Contact the Team
Product Training
Product Page
Procedures

1. Complete an approved SF-182 (See attached). Please do not include PII such as DOB, SSN, Home Address, Home Phone.

2. Please submit your approved SF 182 to Training and Professional Development.
All,

Please see below regarding the "Human Trafficking Community of Interest (COI)".

Thanks,

[Redacted]

Group Supervisor
Homeland Security Investigations (HSI)
11A Clinton Avenue, Suite [Redacted]
Albany, NY 12207
518-431-6499 (office)
716-583-1894 (cellular)
Some of you may have already received this invite, but please feel free to forward to others in your circle that may be working to end human slavery.

The Human Smuggling and Trafficking Center is excited to introduce the “Human Trafficking Community of Interest (COI)”. The Human Trafficking COI is a secure and interactive web-based collaboration space for U.S. government interactions only and is optimized for individuals actively engaged in countering human trafficking. The goal of the COI is to bring people and information together to accelerate U.S. efforts against human trafficking issues of common concern. All U.S. government professionals working in the field, to include law enforcement, intelligence and research analysts and policy officers, are welcome to join. The COI boasts a number of exciting functions to include the ability to view and create dynamic content; connect and interact with partners via group chats a community forums; share, edit, and collaborate on documents; visualize data points and much more. The For Official Use Only site is for verified members with “need-to-know” access.

Please see the attached flyer for more details and feel free to disseminate the flyer as appropriate.

To join the COI you'll need to take just a few minutes to complete two quick and easy steps:
- Go to “community.apan.org”
- Enter Human Trafficking in the search bar
- Select “Human Trafficking|HSTC|Public”
- Explore the available resources and submit your request for membership to HSTC@ice.dhs.gov

The HSTC is offering live demonstrations and registration support upon request.

Human Smuggling and Trafficking Center
O: (202) 312-3467
C: (202) 440-3472

Combat Human Trafficking Through Enhanced Collaboration - Join the Human Trafficking Community of Interest
Join Our Interagency Team

- Become an information provider;
- Assist in closing key intelligence gaps;
- Strengthen metrics and statistics;
- Define previously unknown trends & patterns;
- Collaborate on issues of common concern
- Utilize your expertise to provide added value to intelligence products

Connect & Collaborate

Start by Joining the Human Trafficking Community of Interest-
Official Use Only 
(Hosted by HSTC)
- Go to “community.apan.org”
- Enter Human Trafficking in the search bar
- Select “Human Trafficking/HSTC/Public”
- Explore the available resources and submit your request for membership to HSTC@HSTC.org

Human Smuggling and Trafficking Center
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Washington, DC 20006
Phone: 202-312-2106
E-mail: HSTC@HSTC.org

Human Trafficking Affects Us All

Combatting the Global Epidemic of Human Trafficking

The Human Smuggling and Trafficking Center
HSTC is a Federal Interagency Center

Here to Support Your Anti-Trafficking Efforts

Our mission is to provide multi-source and multi-agency data fusion and analysis to assist law enforcement and policy makers in preventing trafficking, protecting victims and prosecuting traffickers.

Objectives & Focus

- Enhance collaborative information-sharing capabilities
- Leverage interagency anti-trafficking subject matter expertise
- Providing extensive support/insight into tactics, techniques, and procedures, and identifying and disrupting trafficking networks

“Fusion centers across the nation have seen a significant increase in the distribution of products from the Human Smuggling and Trafficking Center...Your willingness to share your products and threat information allow fusion centers to continually be informed of current and emerging threats” – President, National Fusion Center Association

HSTC Priority Initiatives

- Emerging and changing trends, patterns, and characteristics
- Critical nodes of recruitment, facilitation, and exploitation
- The relationship between human trafficking and transnational criminal organizations
- Mechanisms used to finance operations and conceal proceeds
- The role of cyber technologies to facilitate human trafficking
- Human trafficking supply chains

Interagency Partnering is Critical

- Human Trafficking data fusion
- Identifying information and intelligence gaps
- Interaction with stakeholders
- Preparing and disseminating operational and strategic-level analysis

Partner with HSTC to develop comprehensive evidence-based Human Trafficking related products.
Human Trafficking Community of Interest (COI)

Unifying Against Human Trafficking Through Web-Based Tools, Interactive Communication, & Real-Time Information Sharing

What is the Human Trafficking COI?
The Human Trafficking COI is hosted by the Human Smuggling and Trafficking Center (HSTC), a legislatively mandated interagency center put in place to enhance collaboration and develop and deliver intelligence to counter human trafficking, protect victims, and aid in the investigation and prosecution of suspects. The Human Trafficking COI is a secure and interactive web-based collaboration space for U.S. government interactions only and is optimized for individuals actively engaged in countering human trafficking.

Why should you join?
The goal of the COI is to bring people and information together to accelerate U.S. efforts against human trafficking issues of common concern. All U.S. government professionals working in the field, to include law enforcement, intelligence and research analysts, and policy officers, are welcome to join. Benefits to joining include:

- Access to a comprehensive view of anti-trafficking efforts
- Access to a multidisciplinary community of professionals
- Access to free web-based tools

What are the key features?
Through proactive engagement and interaction, COI participants will be able to:

- **View and create** dynamic content to help inform your anti-trafficking efforts using Adobe Connect, Group Chats, and a Community Forum;
- **Share, edit, and collaborate** on documents and media of all types;
- Map human trafficking routes and area specific indicators;
- **Find and interact** with colleagues; and
- **Gain** awareness and contribute to human trafficking initiatives.

Is it secure?
All COI members must request access by submitting a registration form. Registrant’s information is verified through the network that supports the COI and HSTC reviews and grants access based on “need-to-know”. Two-factor authentication is required to access to the site. The COI is an approved “For Official Use Only” platform.

How can you learn more?
To learn more about the HSTC or the Human Trafficking COI, please contact:
HSTC COI Inquiries, HSTC@humantraffickingcenter.gov 202-312-5780

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