



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535-0001

APR 01 2014

The Honorable Charles E. Grassley
United States Senate
Washington, DC 20510

Dear Senator Grassley:

I am writing in response to your March 4, 2014, letter to FBI Director James B. Comey regarding the FBI's Innocence Lost National Initiative (ILNI).

Thank you for your interest in the FBI's recent operation focused on child prostitution at the Super Bowl. The victimization of children through prostitution is of great concern to the FBI. Through partnerships with the appropriate state and local agencies, the FBI is working to significantly impact this criminal problem while ensuring the needs and safety of the child victims are properly addressed.

The ILNI employs a victim-centered, multidisciplinary team investigative model, targeting the growing problem of child recruitment into prostitution. This initiative was established in 2003 and is supported by the Department of Justice's Child Exploitation and Obscenity Section (DOJ/CEOS) and the National Center for Missing and Exploited Children (NCMEC). Since the inception of the ILNI, over 2,100 investigations have been opened and have resulted in over 1,450 convictions and over 3,100 children recovered. To date, the youngest victim recovered was nine years old. Substantial sentences have been obtained for convicted pimps, including many ranging in length from 25 to 50 years and 13 life sentences.

As noted above, the ILNI is victim centered. The FBI's Office for Victim Assistance, along with Victim Witness Specialists from the offices of the United States Attorneys and other non-government victim assistance service providers are involved in all stages of the coordination and execution of our enforcement operations. This collaborative effort ensures the immediate and long-term needs of the victims are assessed at the earliest opportunity. During ILNI enforcement operations, FBI Victim Specialists are on site to give immediate attention to the needs of victims.

During the recent Super Bowl operations, 52 women and 18 children were provided services. Three of the 18 child victims were known to be from the foster care system. These three children were provided with various services to include food, clothing, and hygiene items, after which they were transported to the hospital for evaluation. Additionally, three of the

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18 child victims were treated as juvenile offenders by our local partners. Specifically, two victims had outstanding warrants, while the third victim refused to provide identification information.

The FBI does not determine custodial placement of minors as there is no federal equivalent of a state child protection system. As suggested in the 2011 Attorney General Guidelines on Victim and Witness Assistance, the FBI uses a multidisciplinary team approach and has partnered with appropriate state social service entities when assessing the long term needs of the child. The FBI defers to these social service entities and their ability to ensure compliance with protocols and state laws in determining the proper placement of victims within appropriate child protection and juvenile justice systems. As such, the FBI can only account for the services provided by our employees. Once the child victims are remanded into the custody of the appropriate system, the FBI's ability to maintain long-term tracking of the child is significantly diminished.

Since establishing the ILNI, the vulnerabilities of these victims and the techniques used to recruit and exploit them have evolved. In the past 11 years, we have continued to assess the child prostitution threat and evaluate intelligence gleaned from these cases. Through this process we have been able to determine the significance of foster care facilities as places of recruitment. The FBI Victim Specialists have not been required to track and maintain data on incidents involving foster care facilities. However, we continue to evaluate the nature of our collection efforts to ensure they sufficiently address the needs of the initiative.

As a standard practice, FBI Victim Specialists assess the immediate needs of every child they encounter during and after ILNI enforcement operations. The children have been referred to health care facilities for follow-up care related to the victimizations, as necessary. Children that could not be returned to parents, legal guardians, or state child protective service agencies were referred to shelters or local, state, or national victim assistance programs established to work with commercially sexually exploited children to provide the victims with appropriate care.

FBI Victim Specialists track the number of referrals that they provide to victims and their family members who are recovered as part of the ILNI. Victim Specialists are not required to track whether the victims utilize the referral or if services are rendered. However, FBI Victim Specialists typically follow up with victims and family members and inquire as to whether they followed through with the referrals that were provided.

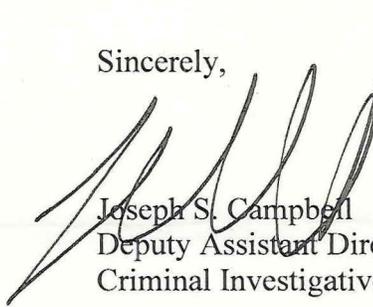
As noted above, the FBI utilizes a victim-centered approach during the ILNI and works hard to educate law enforcement, prosecutors, judicial officials, and the community of the circumstances these victims face on a daily basis. The FBI treats them as victims and works to support their needs upon recovery. However, these issues are complicated and, as you know, in some cases our local partners are required to detain a child victim. Some states require a child to be placed into a social service or judicial system prior to being eligible for state services. In

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some cases, state authorities must work through issues involving children with outstanding warrants or those who simply fail to provide any means to positively identify them.

Thank you for your interest in the ILNI, and I hope this information will be helpful to you.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Campbell', written over the typed name.

Joseph S. Campbell
Deputy Assistant Director
Criminal Investigative Division