

Human Trafficking—Recent Trends:  
A Local Law Enforcement Perspective

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“Human Trafficking: Recent Trends”  
Date: March 19, 2009 10:00 AM

## **Introduction**

I became involved in working with federal, state, and local agencies regarding human trafficking in 2004. I joined the Orange County Human Trafficking Task Force (OCHTTF)—at that time, a loose knit, unfunded collaboration of agencies concerned with the issues surrounding human trafficking. Over the course of the next five years, my agency (the Westminster Police Department, CA) attempted to proactively pursue human trafficking cases while teaming with Immigration & Customs Enforcement, the Federal Bureau of Investigation, the Department of Labor Wages & Hours Division, and a host of passionate, non-governmental agencies, indirectly led by Community Service Program (CSP), Inc.'s Director of Victim Services Ronnetta Johnson.

From 2006 through 2008, thanks in large part to Congresswoman Loretta Sanchez, the OCHTTF received funding for administrative support and law enforcement outreach, training, and overtime. Thanks to Marissa Ugarte of the Bilateral Safety Corridor Coalition, via a contract with the Department of Health & Human Services, OCHTTF participates in the Unity Coalition program funding, allowing for dedicated efforts to be made regarding community outreach and awareness. Due to the two-year federal earmark, our task force was able to outreach more than 10,000 citizens at a variety of presentations, seminars, and community events. In addition, we were able to federally certify at least 8 human trafficking victims in Orange County during this time period as well, and provide alternate services to 30 other victims. Currently, we are finalizing our submission to the Bureau of Justice Assistance so we can begin to actively participate as one of the 42 federally funded task forces in the United States, along with our OVC partner, the Salvation Army.

The task force owes much to our many political supporters, and from our partnerships and dialogues with cornerstones of human trafficking, including Dr. Laura Lederer, Dr. Melissa Farley, and Dr. Mark Lagon—to mention just a few. I would be remiss not to acknowledge the strategic suggestions from the policy and grant coordinators at the Bureau of Justice Assistance, as well. Finally, we are indebted to the members of the various task forces we have met at the National Conferences and other venues. Their willingness to help and proffer actionable advice continues to be a source of meaningful support for our task force and our law enforcement efforts.

## **Issues in Human Trafficking**

Recently, OCHTTF members participated in a facilitated strategic suggestion session at our February 2009 meeting. Many pertinent recommendations were made by NGOs and law enforcement representatives during this session. [I have included the entire list of suggestions at the end of this document, for your reference, as Appendix I.] On the whole, our task force membership continues to be passionate and involved with the outreach and protection aspects of the human trafficking strategy. I expected our partners to encourage more proactive investigations by federal and local law enforcement. Instead, I was surprised to hear many of the suggestions center on law enforcement representatives participating in outreach activities. It is with mixed feelings that I perceived that the passion and expertise of the NGOs and their representatives with regards to eliminating human trafficking still requires the presence and partnership of law enforcement representatives for validation. The Westminster Police Department acknowledges the importance of local law enforcement participation in the task

force, and continues to work towards being a primary mover with regards to the task force and considering and developing strategies and tactics aimed at the elimination of slavery.

I consider the following four issues to be most relevant to today's topic:

1. The "severe" definition of human trafficking at the federal and state levels hampers document servitude prosecutions of traffickers.
2. Local concerns regarding the legalization of prostitution.
3. Effectively implementing and supporting the model of human trafficking.
4. Holding the people using trafficked humans more accountable.

### **Reiterating Issues with the "Severe" Definition of Human Trafficking**

I belabored this topic two years ago at my previous testimony before this Committee. For your convenience, I have included my statement from two years ago for ease of reference (Appendix II). I consider the severe definition of trafficking to be the number one issue with regards to challenges in getting human trafficking prosecutions.

We continue to find many cases involve victims receiving and apparently possessing money for their "services." This practice is an inspired one by the traffickers, as the money helps muddy the waters as to whether the victim is being trafficked or is a willing prostitute. This practice is a subtle form of coercion and fraud: coercion in the sense of giving the victim the impression she is "earning" something, which in turn mitigates the egregious loss of freedoms and choices; fraud in the sense the money is essentially colored paper or electronic effluvium, as the vast majority of our victims do not have the option of even spending their money. All the while, the trafficker holds on to the victims' documents and controls their movements, but is not even held accountable for this aspect of human trafficking.

I have spoke with other task forces (Clearwater Police Department, for instance), and they are finding the same practices in their respective jurisdictions. This payment strategy by traffickers is keeping many of them from being federally prosecuted, with pimping and pandering at the state level often being their most severe penalty. In fairness, pimping and pandering can have more severe penalties at the state level than the state statutes for human trafficking. Nonetheless, the state punishments are less severe than the federal statutes. Prosecutors have disclosed that their concerns focus on issues of jury appeal: the difficulty in explaining how a trafficking victim can make money. Overall, this strategy manages to undercut effective documentation of actual levels of trafficking in the United States, as well as victim identifications and federal certifications.

### **Local Considerations Regarding Legalization of Prostitution**

The citizens of San Francisco recently fought off Proposition K: a proposition to not enforce or investigate prostitution in the city. Proposition K lost with a vote against of 59%; substantial enough to defeat the issue, but close enough to give me pause. I spoke with the OCHTTF's administrator, Sandra Morgan, and she told me she had tagged this issue in her computer system and that a week did not go by that a politician was not reported as suggesting the legalization of prostitution as a way to regulate this "reality," as well as generate extra income for cash strapped local and state economies. While I could articulate the challenges this would cause for sex trafficking investigations, I knew this issue was more insidious and complex.

Then, I was introduced to Dr. Melissa Farley’s (2007) research focused book *Prostitution & Trafficking in Nevada: Making the Connections*<sup>1</sup>. Dr. Farley’s research, and the research of her colleagues, which is also included in this text, cleared the waters for me in regards to this issue. Proponents of legalization neglect to mention that (a) legal brothels are just as dangerous as illegal brothels for the women who work in them, (b) legalized brothels appear to be gateways for organized crime into our communities, (c) state sanctioned prostitution is state sanctioned violence against women, and (d), more germane to our current topic, the introduction of legalized prostitution appears to increase the levels of sexual exploitation of adults and minors, including increases in human trafficking.

Dr. Farley’s and her colleagues’ research was very eye opening for me, and I do not do it justice in a paragraph or two. However, I would like to take this opportunity to suggest a strong cautionary note to those well-meaning public servants who are considering legalizing prostitution as a viable economic strategy. Foremost, I would invite you to read Dr. Farley’s book, and other research related to prostitution and human trafficking; I believe the results speak for themselves. However, if this is not enough, I would suggest that any monetary rewards that might be gained by the legalization of prostitution would be far outweighed by the increased burdens on local and federal law enforcement for investigating increased crimes related to sexual exploitation of adults and minors—not to mention the increased workload to health care and social service agencies.

### **Implementing Models to Combat Slavery**

When CSP, Inc., and the Westminster Police Department began the Orange County Human Trafficking Task Force (OCHTTF) five years ago, we modeled our—then—informal, grassroots coalition after the federal model: prevention, protection, and prosecution. The OCHTTF had subcommittees for each of the three areas of concern. We spoke with neighboring task forces, who reinforced the structure of the federal model. We embraced the restorative justice approach the government advocates. Over the next couple of years, our practices fleshed out the federal model, and our two year earmark funding reinforced our approach and perceptions regarding the victim advocacy, restorative justice approach (below).

### OCHTTF Implementation of the Federal Model for Human Trafficking



<sup>1</sup> Farley, M. (2007). *Prostitution & trafficking in Nevada: Making the connections*. Prostitution Research & Education: San Francisco, CA.

The OCHTTF's long term goal of becoming a federally funded task force was realized in September of 2008, when we were notified we would become one of the 42 federally supported anti-human trafficking task forces. We discovered quickly that our experience with the federal support via a Congressional earmark is significantly different than being funded directly through the Bureau of Justice Assistance (BJA) and the Office of Victims of Crime (OVC). I am not bringing this to your attention to critique either of these agencies; to the contrary, I have found both agencies to be staffed with resourceful agents who are committed to eliminating trafficking.

However, the bifurcated funding stream for anti-human trafficking has put strain on the OCHTTF's current model and our community partners, many of whom have had active roles since our grassroots beginning. I have attended many human trafficking conferences, and have heard of similar tensions. At the time, I did not understand the frustrations being expressed. I was naïve: the OCHTTF enjoyed a single funding stream at that time from the earmark, so BJA funded our law enforcement, victim advocacy, and outreach efforts. Now, with law enforcement efforts exclusively funded through BJA and NGO efforts funded solely through OVC, we are in the process (still) of retooling our complex three part implementation based on the federal model of trafficking with two source funding.

The OCHTTF looks forward to meeting the requirements of the two-part funding and continuing our efforts to enforce human rights, create community partnerships, and sustain victims' personal dignity. I suggest future funding efforts in this venue might be better served by using an "earmark" approach to funding: one funding source for complex collaborative efforts with national priority. One funding source minimizes the potential for competing local funding interests, the confusion at the local levels regarding which agency should fund which legitimate function, reinforces and encourages greater simplicity for local solutions developed based on local contexts, and creates single source accountability for the allocation and expenditure of funds.

Single source funding would also streamline the data collection and reporting regarding human trafficking efforts. I discovered and read the OIG audit report<sup>2</sup> on the human trafficking grantees' reporting efforts upon notification that the OCHTTF would be receiving federal support. I considered the report to be harsh and surprising: I have met and/or worked with people from many of these agencies, and they are dedicated to sustaining and enforcing human rights. Concurrently, I learned about the new grant performance reporting requirements and I began to understand how reporting and tracking could become confused.

The data collection and reporting for federally supported task forces mirrors the bifurcated funding streams. The BJA and OVC must independently report each month on their activities, and somehow avoid redundancies; in addition, semi-annual reports of performance are duplicated, as well. The complexity of outreach alone argues against such an approach: a well-planned training/outreach event will involve BJA and OVC funded partners. So, who reports the event, and to which monthly and semi-annual report? Natural and eventual small breaks in communication amongst any task force partners can lead to data redundancies in the prevention,

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<sup>2</sup> Office of the Inspector General. (July 2008). *Management of the Office of Justice programs' grant programs for trafficking victims*. US Department of Justice, Audit Division: Washington, DC. Audit report 08-26.

protection and prosecution areas. Not to mention the personnel duplication of data collection and entry efforts. Not to mention the creation and maintenance of separate reporting databases. And I have not even delved into the extensive and potentially redundant data entry required under Health and Human Services contracts.

A single funding source approach would help streamline data collection and reporting processes. One monthly report would suffice for all three aspects of the federal model; one semi-annual report would suffice for all three aspects of the federal model. A single funding source, “earmark” approach reinforces the federal model of human trafficking, while allowing local partnerships to form based on local contexts and perceived needs. Task forces would be able to minimize potential redundancies in data collection and reporting, and be able to dedicate more time to the business of the day with less administrative overhead.

Overall, local efforts to pursue human trafficking issues involve complex, interconnected partnerships formed and developed based on locally interpreted federal models of action. Attempting to separate funding for these efforts is like trying to divide a baby: complications are inherent in the process, and the results are usually not sustainable (or desirable). A single funding source would streamline the funding, data collection and data reporting processes, and minimize the chances for redundant data entry. A single funding source would minimize the administrative overhead for the granting agencies and the funding recipients, and allow for more efforts to be expended towards implementation of grant commitments. A single funding source would best reinforce the intricacies of grassroots community collaborations that inform many, if not all, of the human trafficking task forces, while still allowing for direct accountability by the funding recipient for the implementation of the federal model.

### **Holding Users of Human Trafficking Organization’s Services Accountable**

The recent version of the TVPA indicates, among other things, a greater commitment to criminal prosecutions and holding all actors in a human trafficking organization accountable. OCHTTF members have been encouraged to see these changes, and hope they result in increased prosecutions and victims identified and saved. I cannot help but think of the results from Macleod’s et. al.’s (2008) interviews of Scottish johns, or “punters,” and how they consider being listed as a sex offender, jail time, large fines, and publicizing their crimes as severe enough penalties to deter them from participating in such illegal enterprises (p. 27)<sup>3</sup>. It is refreshing to be able to see actionable laws reflecting sound research.

From my local perspective, the weak component in our cases in California has been how users of trafficking services (predominantly “johns”) have been addressed. In California, it is a misdemeanor to be a john, and the charges become even more vague for those more peripheral participants—landlords, transporters, renters of residential brothels, chiropractors who lend their name to massage parlors, etc. Treating johns as felons is problematic because these criminals provide valuable intelligence regarding how a trafficking organization is run, and usually have information regarding multiple locations. Any insight into these criminal enterprises is very

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<sup>3</sup> Macleod, J., Farley, M., Anderson, L. & Golding, J. (2008). *Challenging men’s demand for prostitution in Scotland: A research report based on interviews with 110 men who bought women in prostitution*. Women’s Support Project: Glasgow, Scotland. 1-38.

valuable, especially since most criminal enterprises being so clandestine in nature, and their inner workings are extremely difficult to decipher based on surveillances and wire taps.

Nonetheless, these johns and peripheral participants develop, maintain, and form the foundation for the traffickers' client base—the demand side of the criminal equation. Perhaps it is time, for law enforcement to hold these trafficking agents more criminally accountable. Ekberg's (2004) description of the Swedish approach to anti-trafficking seems a case in point: when men in Sweden attempt to buy prostituted persons, they are considered to be perpetuating “a form of male sexual violence against women and children” (p. 1189)<sup>4</sup>. While the Swedish laws are more complex than presented here, the result has been a dramatic decrease in prostituted women and trafficking of persons (Ekberg, 2004, p. 1210). Perhaps it is time for local law enforcement to base their prosecution strategies on established research and best practice. Perhaps it is time to move johns from solicitors to conspirators.

The crime of conspiracy does not require new laws, as the states already have laws dealing with conspiracy. The crime of conspiracy allows for conspirators to be liable to the same penalties as human traffickers and pimps. The crime of conspiracy is already familiar to investigators, prosecutors, and judges, and its application has a long history of success. And, consistent use of the crime of conspiracy has a real chance, based on the research and best practices, of making these demanders of inhumane services cease their demands.

## **Conclusion**

I have attempted to address four areas that impact, or that can potentially impact, local attempts to proactively address anti-human trafficking efforts. These areas were:

1. The semantics of the human trafficking laws still contribute to cases not being considered by federal and state prosecutors. Traffickers have developed an inspired strategy of allowing their victims to apparently possess money. This practice helps obfuscate the clear distinctions between trafficking victims and prostitutes, leading to cases that potentially lack jury appeal. Document servitude cases are being overlooked due to this trafficker strategy that is used across the country.
2. The dialogues and attempts to legalize prostitution are of great concern. Law enforcement agencies are stretched thin with budget cuts. Well meaning but myopic attempts to benefit from prostitution will prove to be a great detriment, and involve state and local governments in the sexual exploitation of adults and minors. Enacting such laws would add to the workload of law enforcement, social services, and health care agencies, while potentially creating a government advocacy for an industry associated with criminal enterprises and the sexual exploitation of adults and minors.
3. Enacting the federal model for anti-human trafficking is a challenge anti-human trafficking task forces welcome. However, the bifurcated funding stream for federally supporting these task forces can potentially hamper local efforts. Dual funding sources result in dual reporting requirements, and open the door for the potential duplication of data (or complete loss of data). Dual funding sources artificially separate task forces, which are—at their best—interrelated community and law enforcement partnerships

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<sup>4</sup> Ekberg, G. (2004). “The Swedish law that prohibits the purchase of sexual services: Best practices for prevention of prostitution and trafficking in human beings”, *Violence Against Women*, vol. 10, no. 10, 1187-1218. Retrieved from [www.prostitutionresearch.com](http://www.prostitutionresearch.com).

developed in their local contexts to enact the federal anti-trafficking model. A single funding stream model, as if afforded in federal earmarks, may provide greater support of the federal model, support the interconnected locally diverse task forces, while allowing for more direct accountability with regards to funds expended and data collected and reported.

4. Holding the users and enablers of slavery services accountable is a vital component to successfully developing anti-trafficking enforcement strategies. Historically, the users of sexually exploited persons, or “johns,” have not been held criminally accountable to the same level as the pimp or trafficker. For instance, in California, it is a misdemeanor to solicit a prostitute. The situation is made even more complex, in that johns have information about brothels and massage parlors that law enforcement would not normally be aware of without debriefing them. Nonetheless, legal consideration of the john not as a solicitor, but a conspirator, appears to be supported in the anti-human trafficking research and best practice. In California law, this would allow for Johns to receive equal punishments to the traffickers themselves. While this discussion is at its infancy, I hope we can develop a unilateral strategy to deter, if not eliminate, the demand side of this trafficking equation.

I would like to take this opportunity to thank the panel for inviting me to appear on behalf of the Orange County Human Trafficking Task Force and the local law enforcement perspective. I continue to be impressed by the dedication and compassion of the law enforcement agencies and NGOs involved in the anti-human trafficking effort. I would also like to thank the OCHTTF’s Administrator Sandra Morgan for her feedback in developing this position paper. In addition, I would like to thank Sgt. Thomas Finley for his feedback and efforts; he has been the cornerstone of our investigation efforts.



**Appendix I:**  
Orange County Human Trafficking Task Force's Suggestions

Lilly Nguyen (Field Representative, Office of Congresswoman Loretta Sanchez) led OCHTTF Topic suggestions and discussion. With the assistance of OCHTTF's Administrator Sandra Morgan, the following list of issues was compiled:

- **Education**-getting the word out to organizations, law enforcement, etc. getting people to understand that we are here to help the victims, flyers, posters. Educate the cops and first responders, firemen, paramedics, those are people who are in contact with civilians more than investigators. If they call 911 and a sheriff gets there first they may not know what you are talking about.
- **BSCC** – (Tobi Aclaro) we need to show that we are united.
- **Public education**, local, identification tools, need a marketing tool to get people to identify it more quickly.
- **Education at national level**, have mandated education for law enforcement.
- **Question: Globally**, in the protection act is the US govt. paying attention to the victims in the other countries?
- **ICE** - Get law enforcement to go out and doing training, outreach to public so people will be able to see that we are on their side. It is very important for people to be able to meet the law enforcement
- **Internet safety component**
- **No funding for domestic trafficking victims**
- The message that **US citizens are victims** as well.
- **Citizen and immigration services (CIS)** is the first to see visa applications so they need someone who would **screen the files** for potential human trafficking and follow up on cases that are denied.
- **Prevention** – anyone who is involved with children needs to have prevention training including, school teachers, school nurses, youth workers
- **Immigration laws** need to be loosened up –refugees screaming asylum and they can't go back because they have these open cases and we can't send them back because of this situation.

**Appendix II:**  
“Severe” Human Trafficking  
*[from Congressional testimony given in March of 2007]*

**“Severe” Human Trafficking**

The emphasis on “severe” human trafficking has undermined many potential human trafficking investigations. The federal severe definition has cascaded into the state definitions, and has become a crutch, used predominantly during commercial sex trafficking, to nullify local efforts to charge suspects with human trafficking. A reassessment of the severe definition of human trafficking is warranted to determine if it can be modified to address the realities local law enforcement is more likely to encounter.

As the panel knows, the federal law regarding human trafficking (HT) originated as a grassroots concern regarding domestic and international trafficking. Non-government organizations (NGOs) led the campaign to have the Trafficking Victims Protection Act of 2000 (TVPA) adopted as law. Before 2000, federal prosecutors had no law directly addressing human trafficking; instead other federal statutes had to be applied in order to prosecute suspects in human trafficking. NGOs and supporters used testimonies of trafficking victims to provide an international and domestic viewpoint underscoring the imperative to have a federal law created. They relied on egregious examples of human trafficking to make their points. General and personal narratives of beatings with hangers, gang rapes, murders, kidnapping, threats of death, chaining victims to beds, extended isolation, forced abortions, food, water and medical deprivation and inescapable debt were used to demonstrate the compelling need for HT laws and victim support. The fact these stories were true added a crucial human dimension to the issue.

Severe human trafficking cases, both domestic and transnational, provide compelling narratives. During the course of my relatively short involvement with human trafficking, every seminar and training I have attended emphasizes these cases, creating an expectation of extreme, inhumane treatment leveled against unwitting immigrants. Federal agencies in Orange County, California, recently completed our first human trafficking prosecution involving child slavery. The case facts paralleled many of the severe depictions of human trafficking: the female child was sold into slavery by her parents in Egypt, kept in the garage on a urine soaked mattress for years, had to perform menial chores at the private residence, was not allowed outside contact, including education, and had to wash her clothes out of a bucket while the traffickers and their children enjoyed all the modern amenities. This case shocks the conscience of most people.

This case, however, is not representative of the commercial sex exploitation cases involving illegal immigrants we have encountered and attempted to develop at the local level. Instead of outright force and physical coercion, we are finding victims who are subjected to more psychological and situational coercion and duress tactics. In one case, we discovered residential brothels using women from Malaysia and Singapore. Before we knew all of the information below, we offered to have the local ICE agents and Assistant United States Attorney take the case, but it was rejected. In this case, which is still undergoing prosecution for state charges of pimping and pandering, the following conditions were found to exist:

- Their passports, identification of all types, and valuables were immediately taken

- The women are naturally isolated by language, social and cultural barriers
- Brothels were secured with closed circuit TV, cameras surrounding the location, and staff
- The money the women took in and received was controlled by the traffickers
- The victim's movements were controlled by the suspects (escorted everywhere)
- Consequence for taking a day off – placed off site at a bad motel at their expense with an escort.
- They were required to work 21 day cycles, with 7 days off, in accordance with their menstrual period.

In further contrast to severe trafficking, they received significant monetary compensation for their “services.” This case was considered a pimping and pandering case due to the lack of “severe” elements associated with the prostitution of the women.

This case is not atypical of the cases we have found when attempting to proactively pursue commercial sex exploitation of illegal immigrants. I had the privilege to participate in a panel with Dr. Laura Lederer (of the State Department) and Lisa Thompson (trafficking advocate for the Salvation Army) a month ago (February of 2007). Both claimed all human trafficking is necessarily severe, and that the term severe was added to the TVPA of 2000 to ensure its passage. I appreciate the need for legislative compromises, but would question the need to keep this terminology seven years after the statute has been in effect.

Regarding commercial sex exploitation, Farley et al. (2003)<sup>5</sup> surveyed prostitutes in nine countries (including the United States) and found that 87% had experienced at least one incident of violence, 57% of prostitutes have been raped, a majority (68%) showed clinical symptoms associated with post traumatic stress disorder, and 89% responded that they needed to get out of prostitution. These findings and others led the authors to conclude their report disputes the contention “that prostitution is qualitatively different from trafficking” (Farley et al., 2003).

My personal perspective on the situation is this: The federal government did not want to get into the business of enforcing prostitution in the domestic arena, but was compelled to take a stand in reference to confirmed reports of severe human trafficking. The severe terminology and the transnational emphasis on victims addressed the need to condemn human trafficking without getting involved with pimping and pandering at the local-state levels. However, human trafficking has evolved over the seven years of the statute, and now we have domestic trafficking of citizens, with a special focus on juveniles, who are considered trafficking victims based on their age (less than 18 years old). In the meantime, states began adopting human trafficking laws, predominantly mimicking the severe language of the federal law.

But the application of human trafficking into the domestic venue has muddied the perception of its relevant elements, especially with regards to the immigrant emphasis and egregious acts. How do you claim a 17 year old American citizen who is a prostitute with a pimp is a human trafficking victim and an 18 year old American citizen who is a prostitute with a pimp is not? In application of the law over time, human trafficking has transformed into protecting children,

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<sup>5</sup> Farley, M., Cotton, A., Lynne, J. et al. (2003). “Prostitution & trafficking in nine countries: An update on violence and posttraumatic stress disorder”, *Journal of Trauma Practice*, vol.2, 33-74. Retrieved from [www.prostitutionresearch.com](http://www.prostitutionresearch.com).

women and men from labor and sexual exploitation, regardless of citizenship. If there is no qualitative difference between a prostitute and a trafficking victim as Farley et al. (2003) assert, and teenage prostitutes who are American citizens are human trafficking victims, then pimps are human traffickers—exploiters of people who prostitute.

A logical next step is to draw parallels between American pimps and panderers (*domestic* human traffickers exploiting citizens) who are able to create psychological dependency in their prostitutes (exploited citizens) and the pimps and panderers (*transnational* human traffickers exploiting immigrants) who are able to create psychological dependency in their prostitutes (exploited immigrants). And how much easier must it be to psychologically entrap a foreign national with severe language, social and cultural limitations (especially if they are here illegally with no documents) than it is to entrap an American citizen? The severe definition of trafficking, along with the many egregious narratives substantiating it, serve to undermine the less dramatic but significantly more prevalent exploitations of immigrants and citizens. The language of the federal law is overdue to be changed to reflect the current research findings and federal enforcement practices.

The good news at the local level is we do not require a human trafficking law to arrest traffickers. We have an array of local laws and some federal laws that can provide significantly more jail time than typical human trafficking convictions. From a local perspective, I have still made an arrest and provided the opportunity for victim services to exploited people. And, if a local law enforcement agency becomes aware of a rare egregious case involving severe human trafficking, I have no doubt they would actively pursue the case, collaborating with as many federal and local agencies as necessary in order to complete the investigation and prosecution.

The bad news at the local level is local law enforcement is reticent to engage their limited resources in pursuit of human trafficking suspects and victims when previous state laws suffice and local political and organizational imperatives do not necessarily seek to forward the vague and apparently contradictory federal statutes. Based on my experience, federal agencies will not collaborate unless juveniles are identified or severe elements can be proven before arrests are made. In the end, extreme legal definitions mitigate local and federal enthusiasms from a daily commitment perspective.