What happens when we get it wrong? Predominant Aggressor Determination in Cases Involving Immigrant and non-English Speaking Victims

In partnership with:



September 4, 2024



NIWAP



- · We provide Training & Technical Assistance to
 - Local, state, federal law enforcement; prosecutors; victim advocates; judges; attorneys; and other professionals
 - Serving immigrant victims of domestic violence, sexual assault, dating violence, stalking, human trafficking, child/elder abuse, and other crimes
- Our goal is to increase immigrant crime victims' safety, justice system participation, and the ability to rebuild their lives and thrive

Virtual Roundtables

- Law enforcement and prosecutors only
- Interactive discussion
 - –Strategies to build rapport, establish trust, and ensure safety
 - –Ask questions from subjectmatter experts and peers
- To register, visit <u>https://www.surveymonkey.com/</u> <u>r/LERoundtable</u>







$NIWAP \ {\tt http://niwaplibrary.wcl.american.edu}$

- Training materials for:
 - –Law enforcement
 - -Prosecutors
 - Systems-based victim advocates
 - –Judges
 - -Attorneys
 - –Other victim advocates
- Statutes, regulations, policies, and government publications
- Training tools, webinars, and podcasts

- Language access
 –Multilingual materials
- Immigration
- Law enforcement and prosecution tools
- Family and criminal law
- Violence Against Women Act (VAWA) confidentiality
- Public benefits, legal services, and economic relief
- Dynamics, culture, collaboration, and safety

Free Training October 31, 2024

- Best Practices: Responding to, Investigating, and Prosecuting Cases of Domestic and Sexual Violence Involving Immigrant Crime Victims
- For: Law enforcement officers, prosecutors, and systems-based victim witness staff
- Location: NH Police Standards and Training
 - 17 Institute Drive, Concord, NH

Free Training October 31, 2024

- Counts toward annual training requirements for NH law enforcement officers
- Class size is limited to 50, so sign up now!
 Scan the QR Code for more information and to register.



Learning Objectives

By the end of this training, you will be better able to:

- Undertake crime scene investigations using qualified interpreters as required by DOJ
- Make predominate aggressor determinations in cases involving immigrant and Limited English Proficient (LEP) victims
- Identify immigrant and LEP victims eligible for victim-based forms of immigration relief
- Avoid criminal convictions of victims and their immigration consequences

General Caveats

- Women, men and children can qualify for U Visas
- Victims of almost all violent crimes, and many other crimes are eligible to apply for U Visas
- That said, many examples that will be used throughout this presentation will refer to female victims of domestic violence and/or sexual assault

NH Law Primary Physical Aggressor

- "When the peace officer has probable cause to believe that the persons are committing or have committed abuse against each other, the officer need not arrest both persons, but should arrest the person the officer believes to be the primary physical aggressor.
- In determining who is the primary physical aggressor, an officer shall consider the intent of this chapter to protect the victims of domestic violence, the relative degree of injury or fear inflicted on the persons involved, and any history of domestic abuse between these persons if that history can reasonably be obtained by the officer." NH RSA 173-B:10 II



NH RSA 173-B:10 II

 In determining who is the primary physical aggressor, officers shall consider:



Relative degree of injury or fear apparent of exhibited either party

History of domestic abuse between the parties

- The predominant aggressor* is the individual who poses the most serious, ongoing threat.
 - International Association of Police Chiefs, 2019
 - The ICAP and many states use the term "predominant aggressor", which has the same meaning as the NH term primary physical aggressor.



What countries do the victims in your jurisdiction come from?*

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New Hampshire (2021)*

- Total foreign-born population 82,127
- * 5.9% of the country's \sim 1.4 million people are foreign born
 - 61.1% naturalized citizens
 - 27% legal permanent residents (as of 2019)
 - 11.9% temporary visa holders or undocumented immigrants
- $_{\circ}$ 51.7% rise in immigrant population from 2000 to 2021

*Length of time immigrants have lived in the U.S.

- \circ 43.1% entered before 1999
- 22.4% entered 2000 2009
- $_{\circ}~$ 34.5% since 2010
- 12% of children under age 18 have one or more immigrant parents
 - $_{\circ}~$ 87.2% of these children are native-born U.S. citizens

*Source: Migration Policy Institute Data Hub (October, 2023) and Lawful Permanent Resident estimates MPI and DHS (2022)

New Hampshire– Countries/Regions of Origin & Limited English Proficiency (LEP)(2021)*

- ✤ Asia -29.9%
 - Southeastern Asia (9.1%)
 - * India (8.6%)
 - China/Taiwan (6.2%)
- ✤ Europe 26%
 - Eastern Europe (10.6%)
 - Northern Europe (7.1%)
 - ✤ Western Europe (5.5%)
- ✤ Latin America 22.3%
 - Caribbean (11.2%)
 - South America (7.3%)

- ♦ Canada 9.7%
- ✤ Africa 6.9%
- ✤ Middle East 4.2%
- ♦ Oceania 1%
- Language spoken
 - 8% of people in the state who speak a language other than English at home
 - 26.4% of foreign-born persons are LEP - speak English less than "very well"

*Source: Migration Policy Institute Data Hub (October, 2023)

New Hampshire-Languages Spoken at Home (2021)*

- ✤ Spanish (32,455)
- French (including Cajun) (16,958)
- Chinese (including Mandarin, Cantonese) (5,531)
- Portuguese (5,167)
- Nepali, Marathi, or Other Indic Languages (4,004)
- ✤ German (3,726)
- Arabic (2,807)
- ✤ Vietnamese (2,216)
- Russian (2,129)
- Telugu (2,038)
- Swahili or Other Languages of Central, Eastern, and Southern Africa (1,953)

* Source: <u>https://www.migrationpolicy.org/data/state-profiles/state/language/NV</u> (October, 2023)

- ✤ Hindi (1,675)
- Tagalog (including Filipino) (1,673)
- Korean (1,468)
- ✤ Italian (1,301)
- Thai, Lao, or Other Tai-Kadai Languages (1,232)
- ✤ Tamil (1,172)

New Hampshire - LEP (2021)*

- Limited English Proficiency (Speak English less than very well)
 - ✤ Naturalized citizens 23.1%
 - ✤ Noncitizens 31.5%
- Limited English Proficiency by language spoken at home
 - Thai, Lao, or Other Tai-Kadai Languages (59.4%)
 - Vietnamese (59.2%)
 - Nepali, Marathi, or Other Indic Languages (51.9%)
 - ✤ Korean (48%)
 - Chinese (including Mandarin, Cantonese) (43.9%)
 - Arabic (40.9%)
 - Swahili or Other Languages of Central, Eastern, and Southern Africa (39.1%)
 - Spanish (33.5%)
 - ✤ Russian (33.1%)
 - Portuguese (31.6%)
 - ✤ Telugu (27.6%)



Immigration Status Overview

Non-Immigrants

- Visitors/tourists
- Temporary Workers
- Students
- Authorized stay is limited

Undocumented

- Entered without Inspection
- Overstay
- Ordered Removed

Immigrants

- Legal Permanent Residents (Green Card holders)
- Family petition
- Employer petition
- Diversity lottery HUMANITARIAN Immigrants
- Refugees and Asylees
- VAWA
- T visa
- U visa
- Special Immigrant Juvenile Status (SIJS)

Scenario

- A neighbor hears loud arguing coming from an adjacent apartment and calls 911
- Officers arrive on scene and Sam answers the door apologizing for the noise and says that his wife, Linda, is having a mental health crisis due to moving to the US
- Sam is holding a bloody tissue against his forehead
- * What are your next steps?

Sam

- * The officers separate Sam and Linda
- Sam tells one officer that Linda has really been struggling with the move to the US
- She's been getting increasingly agitated to the point that he's becoming afraid of her
- Tonight, they were arguing and she threw a ketchup bottle at him
- He points to his head and removes the tissue revealing a quarter sized abrasion



Linda

- The Officer speaking with Linda notices that her English is very broken
- However, she seems to be answering his questions appropriately
- The Officer is able to surmise that the couple was arguing about dinner
- He asks Linda about the wound on Sam's forehead and she points to a ketchup bottle on the floor
- * He asks if she threw it at Sam and she nods yes

What's next?

- * Do you have probable cause to make an arrest?
- * Is this investigation over?
- * Why or why not?
- * What tools do you have at your disposal for this investigation?

Language Access

Best practices to successfully investigate and prosecute cases involving non-English speaking victims



DOJ Model Guidance

- Police provide free language access to:
 - LEP persons who request it
 - When officer decides it is helpful to the criminal investigation or prosecution
- Police will inform members of the public that language assistance is available free of charge
- Language access provided in person's primary language

Limited English Proficiency (LEP): A Federal Interagency Website, https://www.lep.gov

DOJ Sample Policy Center City Police Department

Source of Language Access Laws

- Title VI- No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving financial aid assistance.
- LEP Executive Order 13166 (2001)
 - Requires all agencies receiving any federal financial assistance to
 - Ensure meaningful language access
 - Develop and implement language access plans
 - "Where the denial or delay of access may have life or death or other serious implications, the importance of the full and effective delivery of LEP services is at its zenith."



"Meaningful Access"

"Language assistance that results in accurate, timely and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed or inferior, as compared to programs or activities provided to English proficient individuals"

Limited English Proficiency (LEP): A Federal Interagency Website, https://www.lep.gov



Crime Scene Language Access Large Group Discussion

• What do you do when the people at the scene are limited English proficient?

• How can you get the information you need *to secure the scene?*



DOJ and Exigent Circumstances

- Use the most reliable *temporary interpreter* available to address exigent circumstances
 - -Fleeing suspect
 - -Weapons
 - Life threatening to the officer, the victim,
 or the public

DOJ Requirements for Investigations & Interrogations

- "A qualified interpreter shall be used for any interrogation or taking of a formal statement where the suspect or witness' legal rights could be adversely impacted"
 - Police reports
 - Criminal interrogations
 - Crime witness interviews
- Vital written materials translated into primary language
 - Miranda warnings & Know your rights brochures



Using Qualified Interpreters



<u>Benefits</u>

- Safety
- ID offender
- Locate weapons
- Admissible statements (excited utterances)

<u>Harms</u>

- Mistaken ID of offender
- Arrest of victim
- Misinterpretation results in inaccurate statements
- Trauma to children



Bilingual Officer v. Interpreter

- Bilingual officers
 - When they are interpreting, they are not investigating
- Biculturalism v. bilingualism
 - Different words have different meanings:
 - e.g.: Variations on the word "highway" depending on what state you're from.
 - "500 feet" many communities don't know what that distance looks like.



"Qualified Interpreter"

"When considering whether an interpreter is qualified, the LEP plan discourages use of police officers as interpreters in interrogations except under circumstances in which the LEP individual is informed of the officer's dual role and the reliability of the interpretation is verified, such as, for example, where the officer has been trained and tested in interpreting and tape recordings are made of the entire interview."

Language Resources



- Language line
- Video remote interpretation
- Video relay interpretation Dartmouth Hospital System
- Department interpreters line developed in response to large local refugee population
- Immigrant community based organization partners
- Health care providers
- School systems
- Court systems



DYNAMICS OF DOMESTIC VIOLENCE EXPERIENCED BY IMMIGRANTS



Department of Homeland Security



• DHS Video



Immigration-Related Abuse

- 65% of immigrant survivors report some form of immigration-related abuse (NIJ, 2003)
- Abuse rates among immigrant women is almost three times the national average*
 - Lifetime as high as 49.8%
 - Those married to citizens and lawful permanent residents 50.8%
 - U.S. citizen spouse/former spouse abuse rate rises to 59.5%

* Hass, G. A., Ammar, N., Orloff, L. (2006). Battered Immigrants and U.S. Citizen Spouses

Immigration-Related Abuse, cont'd.

- Among abusive spouses who could have filed legal immigration papers for survivors*:
 - 72.3% never file immigration papers
 - Mean delay of 3.97 years with those who did file
- Threats or taking steps to withdraw an immigration case filed on the survivor's behalf
- Forcing partners to work with false documents

*Edna Erez and Nawal Ammar, Violence Against Immigrant Women and Systemic Responses: An Exploratory Study (2003)



The Perfect Plan

Sexual Assault & Human Trafficking

Vulnerability

Accessibility

Perceived Lack of Credibility



Sexual Assault and Immigrants

- High school aged immigrant girls
 - Twice as likely to have suffered sexual assault as their non-immigrant peers, including recurring sexual assault
 - Decker, M., Raj, A. and Silverman, J., Sexual Violence Against Adolescent Girls: Influences of Immigration and Acculturation, 13 Violence Against Women 498, 503 (2007).
- Latina college students
 - Experience the highest incidents of attempted rape compared to White, African American and Asian college students
 - Kalof, L., Ethnic Differences in Female Sexual Victimization, 4 Sexuality and Culture 75-97 (2000).



Screening

Immigration-related abuse...

10x higher in relationships with physical/sexual abuse as opposed to psychological abuse*

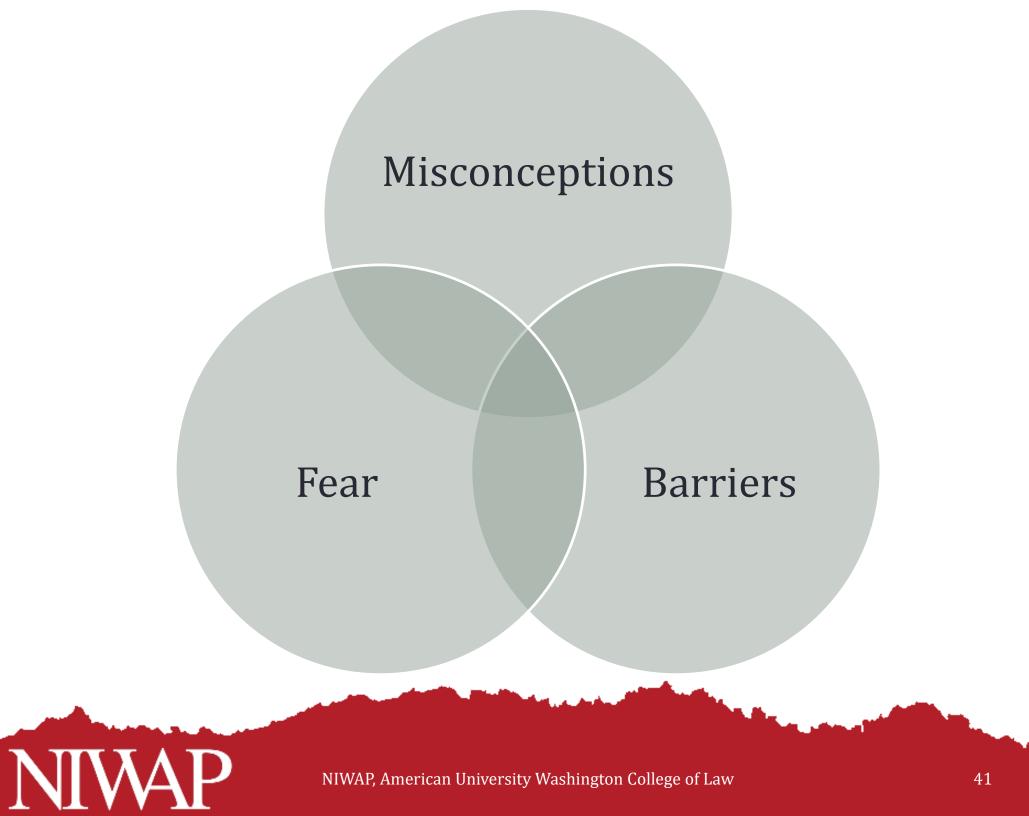
May predict abuse escalation

Corroborates existence of physical and sexual abuse

*Mary Ann Dutton, Leslye Orloff, and Giselle Hass, Characteristics of Help-Seeking Behaviors, Resources and Service Needs of Battered Immigrant Latinas: Legal and Policy Implications (Summer 2000)

What prevents immigrant victims from reporting crime?





Fears

- Deportation
- Returning to home country
- Separation from children
- Lack of contact with family
- Family in danger in their country of origin
- Ostracism from the community
- Retaliation

Misconceptions

- Lack of knowledge of
 - Crime victim legal rights
 - Laws regarding domestic violence, sexual assault
- Do not trust the police
- Believe police will arrest them
- Local police are immigration officers
- No services are available to immigrant victims
- Police are corrupt
- Criminal justice system will do nothing

Barriers

- Do not speak or understand English
- Financial dependence on perpetrator
- Isolation
- Lack of transportation or child care
- Community pressure
- Family pressure
- Religious factors

Lack of Reporting



HISTORY AND PURPOSE OF THE U AND T VISA PROGRAMS AND VAWA'S IMMIGRATION PROTECTIONS



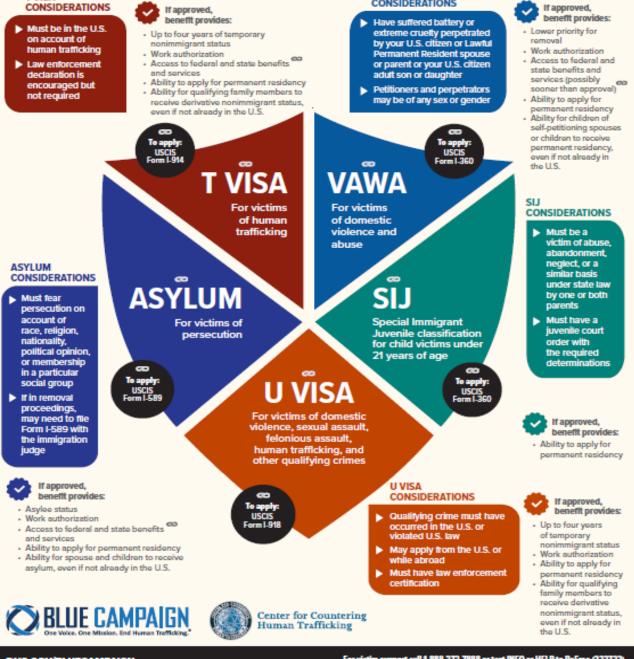
 — U.S. Immigration Benefits for — **NONCITIZEN CRIME VICTIMS**[®]

VAWA

CONSIDERATIONS

Immigration Protections for Noncitizen Victims of Crime and Abuse

T VISA



NIWAP, AMERICAN DIVERSITY Washingtons. College: Of the West West West West was a be found at: www.uscis.gov/forms/all forms

Immigration Law Definition of Domestic Violence (Battering or Extreme Cruelty)

Battering

- Physical violence against
 - Spouse/intimate partner
 - Child
- Use of a weapon
- Sexual abuse & assault
- Stalking
- Other acts defined as domestic violence under state law
- Attempts or threats to do any of these actions

Coercive Control = Extreme Cruelty:

- Strategies designed to retain control or establish domination through fear, dependence, deprivation, isolation, immigration related abuse
 - Deprivation of basic necessities
 - Controlling regulating, monitoring the victim
- Compelling through force, intimidation threats to abstain or engage in conduct against victim's will

Extreme Cruelty:

- Withholding medicine or medical care
- Adultery with a minor
- Financial abuse, seeking to destroy victim's credit
- Accusations of infidelity
- Using children as a tool
- Emotional abuse causing physical or psychological harm

Why do you think these forms of immigration relief exist for victims of crime?



Immigration Relief as a Crime Fighting Tool

Investigations and prosecutions

Reporting of crime

Safety of victims

Relationships with immigrant communities

Identification of dangerous offenders

Legislative Intent

- We want crimes reported to police
- No one should be a victim of crime, especially violent crime
- Offenders prey upon the most vulnerable in our communities, often immigrants
- Without victims reporting crimes, we don't know about the most dangerous offenders
 - Domestic violence
 - Sexual violence

Immigrant Victims and Children Receive

- Protection from deportation
- Legal work authorization which brings access to drivers licenses upon
 - Approval or wait list approval
- · Access to some federal public benefits
 - Varies by immigration case type
- VAWA confidentiality protection upon filing VAWA, T or U visa case

DHS Enforcement Priorities

Civil Immigration Enforcement Priorities (DHS Memo, Sept. 30, 2021)

Threat to National Security	 Terrorism Espionage Priority for apprehension and removal 	
Threat to Public Safety	 Serious Criminal Conduct Mitigating or extenuating facts or circumstances 	
Threat to Border Security	 Apprehended at border or port of entry Entered after Nov. 1, 2020 Totality of the facts and circumstances 	

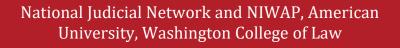


Mitigating Factors In Favor of Declining Enforcement DHS Enforcement Priorities (Sept. 30, 2021) and Trasviña ICE OPLA (May 27, 2021) Memos

- Crime victim, witness, party in legal proceedings
- Person is likely to be granted humanitarian or other immigration relief (temporary or permanent)
- Impact on family in U.S. of loss of caregiver/provider
- Advanced/tender age/pregnancy
- Poor health or serious medical condition

National Judicial Network and NIWAP, American University, Washington College of Law Mitigating Factors In Favor of Declining Enforcement Part II DHS Enforcement Priorities (Sept. 30, 2021) and Trasviña ICE (May 27, 2021) Memos

- Lengthy presence in U.S.;
- Military or public service by immigrant or family member
- History of work in the U.S.
- Pursuit or completion or education in the U.S.
- Time since offense, rehabilitation, conviction vacated or expunged



Removal Requires Enforcement Priority <u>and</u> Consideration of Mitigating Factors

- Post-Nov. 1, 2020 entrants who are
 - Victim of domestic or sexual violence in the U.S.
 - SIJS eligible child
- Victim arrested for domestic violence
 - Victim called police, no qualified interpreters
 - Victim arrested, to get out of jail plead guilty
- Victim arrested for stealing baby food when fleeing abuser

asning

How do immigration relief programs promote officer safety?



U Visa Statistics NIWAP 11/2011 and USCIS 2020

% of U Visas	Criminal Activity
58% to 76.1% = Domestic & Sexual Violence, Crimes Against Children & Human Trafficking	
50%	Felonious Assault, Murder, Manslaughter
9%	False Imprisonment, Kidnapping, Being Held Hostage, Unlawful Criminal Restraint
4% - 5.3%	Torture, Stalking, Blackmail, Extortion, Perjury, Obstruction of Justice, Attempts, Conspiracy, Solicitation, Other U Visa Criminal Activities

IACP 2018 Resolution

- Recognizes U as a significant crime fighting tool
- Recommends using U Visas as best practice
- Supports training, education, communication and "increased police leadership involvement"
- Commits to increasing collaboration

U Visas are "effective tools for law enforcement agencies that enhance public safety, officer safety and protection of victims nationwide."

After VAWA Self-Petitioners and U Visa Victims Receive Work Authorization and Deferred Action

- Increased justice system involvement
 - 114% increase in willingness to trust the police
 - 36% make police reports regarding future crimes
 - 60% seek protection orders and/or custody
 - 22% help other victims report abuse and seek help/justice
- Significant reductions in abusers using the victim's immigration status as a tool to perpetuate abuse
 - 74% decline in immigration-related abuse
 - 78% decline in threats to snatch/cut off access to children
 - 65% decline in efforts to use the immigration status of the victim to gain an advantage in family court

Arresting the True Victim

Probable Cause doesn't mean you have the full picture!



Perpetrator's Use of Immigration to Elude Criminal Investigations & Prosecutions

- Threats or attempts to have immigrant partner deported or have case denied
 - 25% of perpetrators actively report the victim for removal
- Using language proficiency to manipulate law enforcement
 - 36% of perpetrators get immigrant and LEP victims victims arrested for domestic violence*

*Krisztina E. Szabo, David Stauffer, Benish Anver, *Work Authorization For VAWA Self-Petitioners and U Visa Applicants*, NIWAP (Feb. 12, 2014) and Rafaela Rodrigues, Alina Husain, Amanda Couture-Carron, Leslye E. Orloff and Nawal H. Ammar, *Promoting Access to Justice for Immigrant and Limited English Proficient Victims (2017)*



NH RSA 173-B:10 II

 In determining who is the primary physical aggressor, officers shall consider:

Intent of 173-B:10 is to protect victims

Relative degree of injury or fear apparent of exhibited either party

History of domestic abuse between the parties

Primary Physical Aggressor?

- * Were the actions in self-defense?

- * Did the police speak the victim's language or have a qualified interpreter?
- * Who served as the interpreter?
- Did the police only speak with her perpetrator or his family members?

Returning to Sam and Linda

 If self-defense and predominant aggressor determinations were made with Sam and Linda, how might outcomes have been affected?



Immigration Consequences When Immigrant Victims End Up With Criminal Convictions



Criminal Activity and Immigration

Criminal activity may:

- Result in removal/deportation from the United States
- Limit or complicate access to victim based forms of immigration relief
- Delay or completely bar legal immigration
- Delay or completely bar naturalization
- Bar discretionary relief from removal from the U.S.
- In some instances, limit the ability of U.S. citizens to sponsor family members
- Mandate detention

Key Deportable Convictions

- Domestic violence offenses
 - Domestic violence (VAWA definition)
 - Stalking
 - Child Abuse, Neglect, Abandonment
 - Violation of protective provisions of protection order (finding enough)
- Crimes of Moral Turpitude
- Aggravated Felonies
- Managing a prostitution business
- Effect on VAWA self-petitioners and U visa cases

Aggravated Felony Can be Felonies or Misdemeanors

- Theft, burglary if sentence is 365 days or more
 Including petty theft
- Crimes of violence and 365 days or more sentence
- Murder, rape, child molestation
- Drug offenses
- Obstruction of Justice
- Perjury
- Trafficking in firearms
- Ransom
- Child pornography
- Treason





Deportation Grounds = Conviction For:

- Crimes of moral turpitude
 - One crime that carries maximum possible sentence of 365 days or more or two crimes unless part of a single scheme
 - Crimes involving conduct that is inherently "base, vile, depraved and contrary to moral standards" or "malice"
 - Theft, fraud, sex offenses, violence
 - Intentional bodily or property harm or serious harm caused by reckless act
- Drug/firearm offenses
 - any offense "relating to" controlled substances
 - Exception under 30 grams of marijuana for personal use ;
 - Many types of firearms offenses
 - Drug Offenses: "reason to believe" enough no conviction required

Convictions for Immigration Purposes

- Conviction by judge or jury
- Pleas and Nolo contendere
- Admission of sufficient facts as part of a diversion program
- Expungements & vacated convictions
 - No effect, unless based on due process violations (not immigration results)
- Stipulation to attach police report = record of conviction

Large Group Discussion

What are other ways arresting the victim who was not the primary aggressor in the relationship can harm the victim or their children?



Justice System Implications

- Could undermine the victim's ability to be awarded custody of the children
- Perpetrator could gain custody or unsupervised visitation
 - Endangering children
 - Exposing them as witnesses of domestic violence
- It could be harder for a victim to obtain a protection order against the perpetrator
- Perpetrator could obtain a protection order against the immigrant victim

Additional Harms of Arresting Victims

- Emboldening the abuser
- Proves to victim that the abuser is right that justice system will not believe them or help
- Locks victim, and her children in the abusive relationship
- Could impede or complicate victim's access to victim services
- Perpetrator may be able to trigger immigration enforcement against victim

Be Aware of Witness Tampering

- Work with prosecutors to detect signs
 - Change in frequency of contact
 - Missed appointments
 - Recantation or minimization
- Investigate
 - Follow up with victim
 - Contact victim advocate, immigration attorney, others that had contact with victim
 - Jail calls
 - Interview friends, neighbors, and family

Collaboration between Law Enforcement and Prosecution

- Maintain victim and witness contact
- Update victims on case status
- Coordinate victim services
- Investigate witness tampering and other co-occurring crimes

<u>Cooperation is key</u>

Resources

- Technical Assistance
 - Call: 202.274.4457
 - Email: <u>niwap@wcl.american.edu</u>
 - Web Library: <u>https://niwaplibrary.wcl.american.edu/</u>
- Materials for certifying agencies on best practices for working with immigrant victims
 - <u>https://niwaplibrary.wcl.american.edu/law-enforcement-training-materials</u>
 - U and T Visa Certification Toolkit
 - DHS U Visa Certification Resource Guide
 - Roll call training videos
 - DHS Victim Centered Approach

Join a Roundtable or Community of Practice

- Community of Practice for Family Law Attorneys <u>www.surveymonkey.com/r/FamCOP2023</u>
- Community of Practice for Victim Advocates
 <u>https://www.surveymonkey.com/r/VictimAdvocateC</u>
 <u>OPApp</u>
- Roundtable for Law Enforcement, Prosecutors and System-based Advocates -

https://www.surveymonkey.com/r/LERoundtable

 National Judicial Network: Forum on Human Trafficking and Immigrants in State Courts (Judicial Officials only)

https://niwaplibrary.wcl.american.edu/pubs/njnoutreach-letter

Thank You!

