

March 5, 2015

Emilio Álvarez Icaza
Executive Secretary
Inter-American Commission on Human Rights
1889 F Street, N.W.
Washington, D.C. 20006
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Re. Hearing on March 16, 2015 - Human rights situation of children victims of sexual trafficking and exploitation in the United States

Dear Executive Secretary Álvarez Icaza,

We are pleased that the Inter-American Commission on Human Rights has granted our request for a hearing regarding the human rights situation of children victims of sexual trafficking and exploitation in the United States. In advance of the hearing on March 16, we provide below the following information:

- 1) List of persons who will make up our delegation;
- 2) List of governmental entities we hope to see represented at the hearing; and
- 3) Summary of the main points of our presentation.

Members of the Delegation

The delegation will include:

1. Malika Saada Saar, Executive Director of Human Rights Project for Girls (Rights4Girls)
2. Yasmin Vafa, Co-Founder and Director of Law and Policy for Human Rights Project for Girls (Rights4Girls)
3. Kerry Kennedy, President of Robert F. Kennedy Human Rights
4. Santiago A. Canton, Executive Director of RFK Partners for Human Rights at Robert F. Kennedy Human Rights
5. Angelita Baeyens, Programs Director of RFK Partners for Human Rights at Robert F. Kennedy Human Rights
6. Wade McMullen, Managing Attorney at RFK Partners for Human Rights - Robert F. Kennedy Human Rights
7. Katharine Valencia, Associate Americas Program Officer, RFK Partners for Human Rights - Robert F. Kennedy Human Rights
8. Holly Burkhalter, International Justice Mission (invited)

Governmental Entities at the Hearing

We believe the hearing would be most productive if the following governmental entities were represented, and kindly request that the Commission and U.S. Mission to the Organization of American States submit official invitations to:

- U.S. Department of State's Office to Monitor and Combat Trafficking in Persons;
- U.S. Department of Justice's Civil Rights Division;
- U.S. Department of Justice's Office of Victims of Crime
- U.S. Department of Health and Human Services' Administration for Children and Families

Summary of Main Points of Petitioners' Presentation

Introduction

According to the Federal Bureau of Investigations (FBI) in the United States, there are approximately 300,000 American children at risk for commercial sexual exploitation and sex trafficking in the U.S.¹ The average age a child is first forced into sex trafficking is between 13-14 years old.²

Whereas in other countries trafficked children are regarded as victims, rescued from brothels, and provided services and care, trafficked children in the U.S. are routinely arrested and imprisoned for prostitution or related offenses. Despite the fact that under U.S. federal law and binding international human rights law there is no such thing as a "child prostitute," U.S. state and local law enforcement continue to arrest and detain children for this offense. In fact, the federal Trafficking Victims Protection Act (TVPA)³ makes clear that in the United States, any individual under the age of 18 who is induced to perform a commercial sex act is a victim of a severe form of trafficking in persons.

Each year, more than 1,000 children are arrested for prostitution nationwide.⁴ Most of them are not of legal age to consent to sex, let alone commercial sex. In violation of international law in the United States, these children are not seen or treated as victims. In its annual survey of each country's response to human trafficking, the U.S. State Department's Annual *Trafficking In Persons Report* gives the United States its highest rating, despite acknowledging these abuses

¹ FBI Law Enforcement Bulletin: Human Sex Trafficking, March 2011, available at: <http://leb.fbi.gov/2011/march/human-sex-trafficking>

² Effects of Federal Legislation on Commercial Sexual Exploitation of Children: Department of Justice, OJJDP, July 2010. Available at: <https://www.ncjrs.gov/pdffiles1/ojjdp/228631.pdf>

³ Trafficking Victims Protection Act, (22 U.S.C. § 7102; 8 CFR § 214.11(a))

⁴ Department of Justice, Arrest in the United States 1990-2010, available at: <http://www.bjs.gov/content/pub/pdf/aus9010.pdf>

occur against children: “those under the age of 18 years were reportedly detained or prosecuted for criminal activity related to their being trafficked.”⁵

Lack of harmonization between federal and state law

The Victims of Trafficking and Violence Protection Act of 2000⁶ the Trafficking Victims Protection Reauthorization Act of 2003⁷, the Trafficking Victims Protection Reauthorization Act of 2005⁸, and the Trafficking Victims Protection Reauthorization Act of 2008⁹ provide the tools to combat trafficking in persons both worldwide and domestically.

Despite its federal nature, the TVPA is frequently disregarded by U.S. states that choose instead, to arrest and detain child victims of sex trafficking under state and local prostitution laws.¹⁰ The use of such prostitution laws to criminalize child victims is not only a flagrant violation of these children’s human rights, but also a violation of United States federal law.

A report on the crisis of American youth’s trafficking and exploitation in the U.S. reveals that in just two cities alone, Las Vegas and Dallas, the number of child arrests for prostitution were staggering. In Las Vegas, Nevada, 226 juveniles came before the Juvenile Court judge in just 20 months while in Dallas, Texas, 165 juveniles were detained on prostitution and related charges in just 2007.¹¹

To date, only 15 U.S. states¹² have passed laws to discourage the prosecution of child victims for prostitution offenses. The levels of protection granted by these laws vary greatly as to a variety of factors including, among other aspects: whether they encompass all children under the age of 18; whether any services are afforded to child victims; whether they prohibit or simply discourage arrest or prosecution of victims; or whether they provide immunity or

⁵ U.S. Department of State, Trafficking In Persons Report 2014, available at: <http://www.state.gov/documents/organization/226849.pdf>

⁶ 22 U.S.C. § 7102

⁷ P.L. 108-193, Dec. 19, 2003, 117 Stat. 2875

⁸ P.L. 109-164, Jan.10, 2006, 119 Stat. 3558

⁹ P.L. 11-457, Dec. 23, 2008, 122 Stat. 5044

¹⁰ The Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA 2008), contains a specific provision stating that no part of TVPRA 2008, the Trafficking Victims Protection Act enacted in 2000, or the TVPRA of 2003 or 2005 shall “preempt, supplant, or limit the effect of any State or Federal Criminal Law.” TVPRA 2008, P.L. 110-457, Title II § 225(a), Dec. 23, 2008, 122 Stat. 5072 as amended by P.L. 113-4, Title XII § 1243, Mar. 7, 2013, 127 Stat.154. The TVPRA of 2008 includes “Model State Criminal Provisions” that *encourage*, but do not mandate, states to avoid prosecution of victims of child sex trafficking for prostitution-related offenses. States have inappropriately interpreted this provision to mean that they can continue to arrest, detain, and prosecute victims of child sex trafficking despite the fact that the TVPA clearly defines these children as victims of human trafficking (22 U.S.C. § 7102(9)(A)).

¹¹ The National Report on Domestic Minor Sex Trafficking, Shared Hope International, 2009, available at: http://sharedhope.org/wp-content/uploads/2012/09/SHI_National_Report_on_DMST_2009.pdf

¹² Connecticut, Delaware, Illinois, Kentucky, Louisiana, Massachusetts, Minnesota, Nebraska, New Jersey, New York, North Carolina, Ohio, Utah, Vermont, and Washington. *2014 State Ratings on Human Trafficking Laws*, Polaris Project, available at http://www.polarisproject.org/storage/2014SRM_pamphlet_download.pdf.

diversion. However, the vast majority of U.S. states have not adopted minimum safeguards and actively continue to incarcerate children and youth – most of them African-American girls from impoverished communities.

Lack of adequate services for children victims of sexual trafficking and exploitation

Throughout the United States, services for domestic victims of child sex trafficking are scarce. Moreover, there is no standard of care for what services ought to be required or the quality of services to be rendered. The few programs offering therapeutic interventions and/or beds for victims are wholly insufficient to meet the needs of child victims nationwide. Access to what little services may be available is further hindered by incarceration where children cannot access meaningful treatment, counseling, or skills from behind bars.¹³

Experts who work on sex trafficking of children in other parts of the world have suggested that child trafficking victims receive better care elsewhere than in the United States.¹⁴ International Justice Mission (IJM), for example, works to reform justice systems, train police, and provide trauma-informed services to child sex trafficking victims throughout the world including in Guatemala, Bolivia, Ecuador, the Dominican Republic, and Peru. In the countries in which IJM works in the Americas, Governments do not allow for the arrest of child trafficking victims and ensure victims of sexual exploitation and their families' support and therapy to heal from their experiences of violence.¹⁵ IJM has worked with many of these Governments to develop best practices for a standard of care for victims of sex trafficking that includes elements ranging from trauma-focused therapy and medical care (including HIV treatment), to education, soft skills training, job placement, housing, transition, and, where possible, family reunification and community reintegration.¹⁶

In contrast, even in those U.S. states that offer “Safe Harbor”, victims of child sex trafficking are often arrested, detained, and sometimes charged with an offense prior to being offered services. Even in U.S. states that have laws or policies prohibiting the arrest of child victims,

¹³ Children in the juvenile justice system, particularly girls, suffer from severe trauma and mental health issues. National Child Traumatic Stress Network, *Trauma among Girls in the Juvenile Justice System* (2004) available at http://www.nctsn.org/nctsn_assets/pdfs/edu_materials/trauma_among_girls_in_jjsys.pdf. Despite these facts, less than half of youth in the juvenile justice system are placed in facilities that provide mental health evaluations for all residents, 88% of juvenile-justice involved youth reside in facilities where mental health providers are not licensed. Andrea J. Sedlak and Karla S. McPherson, *Youth's Needs and Services: Findings from the Survey of Youth in Residential Placement*, Office of Juvenile Justice and Delinquency Prevention, April 2010 (page 8), available at: <https://www.ncjrs.gov/pdffiles1/ojjdp/227728.pdf>. The U.S. Department of Justice has launched investigations into the inadequacy of mental health services for youth in juvenile justice settings. United States Department of Justice. (2011). Department of Justice Activities Under the Civil Rights Institutionalized Persons Act: Fiscal Year 2010. Washington DC: United States Department of Justice. Online. Available: http://www.justice.gov/crt/about/spl/documents/split_cripa10.pdf

¹⁴ Burkhalter, Holly. International Justice Mission: Domestic Sex Trafficking Symposium, John Hopkins Bloomberg School of Public Health, May 1-2, 2013.

¹⁵ International Justice Mission: Guatemala. Available at: <https://www.ijm.org/where-we-work/guatemala>

¹⁶ Burkhalter, Holly. International Justice Mission: Domestic Sex Trafficking Symposium, John Hopkins Bloomberg School of Public Health, May 1-2, 2013.

there is no guarantee that an identified victim will receive appropriate, therapeutic interventions.¹⁷ Absent any uniformly enforced standards of care in the United States, whether an identified child victim will receive services or be criminalized is dependent in which U.S. state she is found. This arbitrary treatment of child victims is especially relevant given that trafficked children are moved by exploiters across state lines so frequently.

Discrimination by law enforcement and in the U.S. justice systems

The criminalization of child victims of commercial sexual exploitation and sex trafficking demonstrates the intersectionality of discrimination based on gender, racial, and socio-economic status by law enforcement and in the U.S. justice systems. In the U.S. victims are disproportionately girls, racial minorities, and from low-income and impoverished communities. In fact, according to the FBI, for arrests under the age of 18, African American girls comprise 61.9 percent of all prostitution-related arrests in the U.S., which is more than any other racial group.¹⁸

African-American and Latina girls are disproportionately represented in the juvenile justice system.¹⁹ Entrenched mythologies about gender, race, and ethnicity that cast them as hyper-sexual, violent, and aggressive can influence decisions made at all points in the process, from the decision to arrest, through adjudication and sentencing, and contribute to the disparities in the representation and treatment of Black and Latina girls in the juvenile justice system.²⁰

Impact of the criminalization of children victims of sex trafficking

Relegating trafficked and exploited girls to the criminal justice system, entrenches girls in their poverty, disconnection, under-education, and exposure to violence, toxic stress, and trauma.²¹

¹⁷ Sex Trafficking of Minors and “Safe Harbor” <http://www.polarisproject.org/what-we-do/policy-advocacy/assisting-victims/safe-harbor>

¹⁸ *Crime in the United States 2013*, Table 43B, Federal Bureau of Investigation, Uniform Crime Reports available at <http://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u.s/2013/crime-in-the-u.s.-2013/tables/table-43>.

¹⁹ Francine T. Sherman, Richard A. Mendel & Angela Irvine, *Making Detention Reform Work for Girls: A Guide to Juvenile Detention Reform*, (April 1, 2013), pp. 26 ; available at <http://lawdigitalcommons.bc.edu/cgi/viewcontent.cgi?article=1499&context=lsfp>

²⁰ Jyoti Nanda, *Blind Discretion: Girls of Color & Delinquency in the Juvenile Justice System*, 49 *UCLA L.Rev.* 1502 (2012), 1531; Meda Chesney-Lind and Randall G. Sheldon, *Girls, Delinquency, and Juvenile Justice*, 4th Edition, 2014, pp. 234-235; Tina L. Freiburger & Alison S. Burke, *Status Offenders in the Juvenile Court: The Effects of Gender, Race, and Ethnicity on the Adjudication Decision* (March 2011), pp. 354 (“Minority girls, therefore, are subject to sexism and racism, causing them to be more harshly treated than White girls and White boys . . . The harsher treatment of . . . Black females, and Hispanic Females may be explained by examining the stereotypical images of these groups.”); Lori Guevara, Denise Herz & Cassia Spohn, *Gender and Juvenile Justice Decision Making: What Role Does Race Play?*, 1 *FEMINIST CRIMINOLOGY* 258, 270-76 (2006) (Juvenile court judges were more likely to consider race in determining appropriate disposition for females).

²¹ Liz Watson and Peter Edelman, *Improving the Juvenile Justice System for Girls: Lessons from the States*, Georgetown Center on Poverty, Inequality, and Public Policy, October 2012, Executive Summary pp.ii; Sherman, et al., *Making Detention Reform Work for Girls: A Guide to Juvenile Detention Reform*, supra n.19, pp.8-13.

When girls are incarcerated for the experience of being propertyed and serially raped, their ability to return to family, community, and school is less likely –which only serves to tighten the traffickers’ control.

For example, victims of child sex trafficking who are arrested and charged have juvenile records. These records greatly limit these youth’s ability to access job opportunities, education, housing, and develop a means out of the poverty they so often come from.²² Even when youth are offered diversion programs, the record of an arrest can follow them for the rest of their lives.

It is also important to point out that girls are vulnerable to sexual abuse and even solitary confinement once incarcerated.²³ Conditions of confinement for girls too often lead to further abuse and trauma.²⁴ The United States must end the incarceration and criminalization of child victims and survivors of sexual abuse for being abused.

The international responsibility of the United States

As reflected in the Recommended Principles on Human Rights and Human Trafficking,²⁵ States have a responsibility under international law “to act with due diligence to prevent trafficking, to investigate and prosecute traffickers and to assist and protect trafficked persons.”²⁶ Further, Recommended Principle No. 7 establishes that “Trafficked persons shall not be detained, charged or prosecuted for the illegality ... for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as trafficked persons.”²⁷

²²Riya Saha Shah, Esq., Lauren Fine, Esq. & Jamie Gullen, Esq., *Juvenile Records: A National Review of State Laws on Confidentiality, Sealing, and Expungement*, Juvenile Law Center, 2014, pp. 12, available at <http://juvenilerecords.jlc.org/juvenilerecords/#!/map>; Ellen Wright Clayton, Richard D. Krugman, and Patti Simon, eds., *Confronting Commercial Sexual Exploitation and Sex Trafficking of Minors in the United States*, National Academy of Sciences, September 25, 2013, pp.122, available at <http://ojjdp.gov/pubs/243838.pdf>; See also Linda A. Smith, Samantha Healy Vardaman, and Melissa A. Snow, *The National Report on Domestic Minor Sex Trafficking: America’s Prostituted Children*, Shared Hope International, May 2009, available at http://sharedhope.org/wp-content/uploads/2012/09/SHI_National_Report_on_DMST_2009.pdf.

²³ *Alone and Afraid: Children Held in Solitary Confinement and Isolation in Juvenile Detention and Correctional Facilities*, American Civil Liberties Union, June 2014, available at <https://www.aclu.org/files/assets/Alone%20and%20Afraid%20COMPLETE%20FINAL.pdf>

²⁴ Julian D. Ford, John F. Chapman, Josephine Hawke, and David Albert, *Trauma Among Youth in the Juvenile Justice System: Critical Issues and New Directions*, National Center for Mental Health and Juvenile Justice, June 2007, pp. 3, available at http://www.ncmhjj.com/wp-content/uploads/2013/07/2007_Trauma-Among-Youth-in-the-Juvenile-Justice-System.pdf; *Custody and Control: Conditions of Confinement in New York’s Juvenile Prisons for Girls*, Human Rights Watch and American Civil Liberties Union, September 2006, available at <https://www.aclu.org/files/pdfs/racialjustice/custodycontrol20060925.pdf>

²⁵ Office of the High Commissioner for Human Rights (OHCHR), *Recommended Principles and Guidelines on Human Rights and Human Trafficking*, (E/2002/68/Add.1). Available at: <http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>

²⁶ Recommended principle No. 2.

²⁷ Recommended principle No. 7.

Most importantly, this instrument categorically states that “[c]hildren who are victims of trafficking shall be identified as such. Their best interests shall be considered paramount at all times. Child victims of trafficking shall be provided with appropriate assistance and protection. Full account shall be taken of their special vulnerabilities, rights and needs.”²⁸

The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which supplements the United Nations Convention against Transnational Organized Crime, was ratified by the United States in November 3, 2005. This protocol mandates that States Parties adopt a series of measures for the assistance and protection of victims of trafficking in persons. Included in such measures are the provision of: (a) Appropriate housing; (b) Counseling and information, in particular as regards their legal rights, in a language that the victims of trafficking in persons can understand; (c) Medical, psychological and material assistance; and (d) Employment, educational and training opportunities.²⁹ In implementing these measures, States Parties should take into account the age, gender and special needs of victims of trafficking in persons, in particular the special needs of children, including appropriate housing, education and care.³⁰

The United States ratified the Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography (“the Optional Protocol”) on December 23, 2002. Article 8.1 of the Optional Protocol requires States Parties to “adopt appropriate measures to protect the rights and interests of child victims of the practices prohibited under the present Protocol at all stages of the criminal justice process, in particular by: (a) Recognizing the vulnerability of child victims and adapting procedures to recognize their special needs...” and by “...(d) Providing appropriate support services to child victims throughout the legal process...”³¹

Article 8.3 additionally requires the United States to ensure that “...in the treatment by the criminal justice system of children who are victims of the offences described in the present Protocol, the best interest of the child shall be a primary consideration.”³² Likewise, in obligating States Parties to “adopt or strengthen, implement and disseminate laws, administrative measures, social policies and programmes” to prevent child prostitution, article 9.1 of the Optional Protocol also mandates that “[p]articular attention shall be given to protect children who are especially vulnerable to such practices.”³³

²⁸ Recommended principle No. 10.

²⁹ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, Article 6.3. Available at: <http://www.osce.org/odihr/19223?download=true>

³⁰ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, Article 6.4.

³¹ Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography (“CRC Optional Protocol”), article 8.1, A/RES/54/263 of 25 May 2000, available at <http://www.ohchr.org/EN/ProfessionalInterest/Pages/OPSCCRC.aspx>

³² CRC Optional Protocol, article 8.3

³³ CRC Optional Protocol, article 9.1

Article 8.4 of the Optional Protocol states that “States Parties shall take measures to ensure appropriate training, in particular legal and psychological training, for the persons who work with victims...”³⁴ and article 9.3 further requires States Parties to “take all feasible measures with the aim of ensuring all appropriate assistance to victims of such offences, including their full social reintegration and their full physical and psychological recovery.”³⁵

Further, in its reservation to the Optional Protocol, the United States maintained that “[t]o the extent that State and local governments exercise jurisdiction over such matters, the Federal Government shall as necessary, take appropriate measures to ensure the fulfillment of the Protocol.”³⁶

The United States ratified the International Convention on the Elimination of All Forms of Racial Discrimination (CERD) on October 21, 1994. In particular CERD obligates the United States to “...take effective measures to review governmental, national and local policies, and to amend, rescind or nullify any laws and regulations which have the effect of creating or perpetuating racial discrimination wherever it exists...”³⁷ and “...to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality before the law, notably in the enjoyment of the following rights: (a) The right to equal treatment before the tribunals and all other organs administering justice; (b) The right to security of person and protection by the State against violence or bodily harm, whether inflicted by government officials or by any individual group or institution...”³⁸ among other rights.

The United States’ failure to protect these children from sex trafficking and its failure to subsequently respect their rights also constitute multiple violations of its obligations under the American Declaration of the Rights and Duties of Man (American Declaration), including article I (Right to life, liberty and personal security), article II (Right to equality before law), article VII (Right to protection for mothers and children), article XVIII (Right to a fair trial), and article XXVI (Right to due process of law). The criminalization of child victims of sex trafficking – disproportionately affecting children of color and low economic status – also defeats the object and purpose of several international human rights treaties that the United States has signed, but not ratified, including the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination against Women, and the International Covenant on Economic, Social and Cultural Rights.

³⁴ CRC Optional Protocol, article 8.4

³⁵ CRC Optional Protocol, article 9.3

³⁶ Reservation of the United States of America upon ratification of the Optional Protocol, *available at*: https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11-c&chapter=4&lang=en#EndDec

³⁷ International Convention on the Elimination of All Forms of Racial Discrimination (CERD), article 2(c), U.N. General Assembly resolution 2106 (XX) of 21 December 1965, *available at*: <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CERD.aspx>

³⁸ CERD, article 5(a)-(b).

Petitions:

In face of the afore-mentioned challenges in the protection of children victims of sexual trafficking and exploitation in the United States, we consider that the hearing will be an opportunity to engage with the State about making significant progress to reverse this situation. Petitioners seek information regarding the State's views and planned next steps on this issue and make the following requests:

To the United States:

- Take action and ensure that the TVPA is implemented at U.S. state and local levels and that no more child victims of sex trafficking or sexual exploitation in the U.S. suffer re-victimization by the very authorities responsible for protecting them. This could be achieved through the adoption of the following measures:

- i. Federal guidance to state and local law enforcement in the form of a directive by the Attorney General on the implementation of the TVPA.
- ii. Federal guidance from the Department of Justice on the protocols to protect child victim witnesses in prosecutions against traffickers, including at the U.S. state or local levels. This guidance should expressly condemn the detention of child victims in juvenile facilities as material witnesses.
- iii. A convening of survivors, experts, law enforcement, and child welfare and juvenile justice officials to develop Standards of Care for identified victims of child sex trafficking.
- iv. Federal guidance for law enforcement on responding to children victims of sexual trafficking and exploitation. This guidance should clarify that any child identified by law enforcement as a victim of child sex trafficking should not be arrested and detained, and should be *immediately* referred to appropriate service providers.
- v. Strengthening federal, state, and local coordination to implement the TVPA, including, *inter alia*, direct and meaningful engagement between federal, state, and local government actors; and development of trainings of local law enforcement.

To the Inter-American Commission on Human Rights:

- i. That the Rapporteurship on the Rights of Children, in coordination with other relevant Rapporteurships such as the Rights of Women, prepare a report on the situation of children victims of sexual trafficking and exploitation in the United States.
- ii. That the Rapporteurs on the Rights of Children and on the Rights of Women conduct an on-site visit to the state of California or another state that the Rapporteurs deem

appropriate, to assess the critical situation of children victims of sexual trafficking and exploitation who continue to be criminalized instead of protected by the government authorities.

- iii. Incorporate the information presented in this hearing in the overview on the human rights situation in the Americas contained in the IACHR Annual Report.

Thank you for the opportunity to present this information. We look forward to raising these issues with you at the hearing on March 16.

Sincerely,

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