



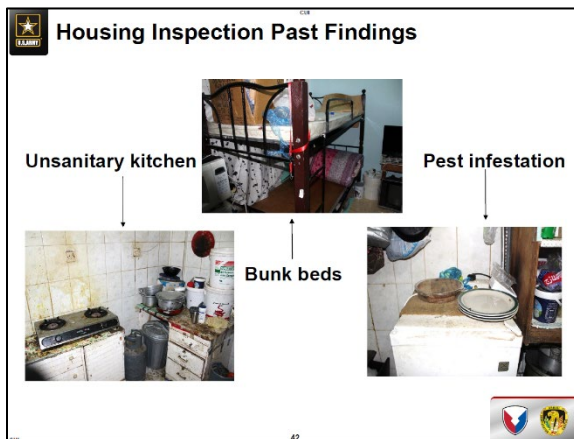
Quarterly CTIP Newsletter

Agency Highlights

CTIP Boots on the Ground in USCENTCOM

Contributed by: Combating Trafficking in Persons Office

For the last 10 years, the Combating Trafficking in Persons (CTIP) Office has had boots on the ground in U.S. Central Command (USCENTCOM). During that time several hundred human trafficking violations have been uncovered. Focusing on prevention and intervention, Mr. Bill Lucas, from Defense Contract Management Agency who was assigned as a Quality Assurance Specialist with the 408th Regional Contracting Center-Kuwait, gave a presentation at the April meeting of the CTIP Task Force. He explained there are established routine CTIP surveillances across all programs and, in Kuwait there were three main contractors. His duty was



to conduct contractor management, employee, and housing audits. Mr. Lucas stated, “This is not a job that can be done from the desk. This is something [where] you must go out there and interact. The more interaction I have with the management of these companies, employees, and the more time I went and visited their housing inspections, every time I went out there, things got better. Just by my presence/our presence being out there, things got better.” He further outlined the coordination and relationships with DoD and outside agencies. As an advocate for CTIP, Mr. Lucas traveled throughout the Middle East to train other DoD contracting personnel and met in-person with various prime contractors, sub-contractors, and employees.

Mr. Lucas gave two examples of how he works, providing some background on the need for day-to-day work to prevent trafficking. For example, in Kuwait, where there are 1.1 million Kuwaiti citizens, there are 3.2 million people that provide services to various entities including the U.S. military. These include contractors, U.S. American government employees, Other Country Nationals (OCNs), and businesses in the area. Almost 70 percent of Kuwait’s population are not Kuwaiti citizens; they are OCNs working on U.S. military installations doing jobs in food services, construction, waste management, security, transportation, and other labor-intensive fields of work. Some were subjected to forced labor, including non-payment of wages, protracted working hours without rest, food deprivation, threats, physical abuse, and restrictions on movement, such as confinement to the workplace and withholding of passports and other identification documents.

In another recent example, Mr. Lucas traveled to Saudi Arabia to perform a spot-check on a contract to supply workers on a U.S. military project there. Using the [CTIP Master Checklist](#), he found the contractor had over a dozen human trafficking violations of [Federal Acquisition Regulation \(FAR\) Subpart 22.17](#) including:

- No CTIP certification clause in the contract
- No CTIP compliance plan
- No awareness program to inform employees about their rights and prohibited activities
- No proper posting of how to report TIP violations (in this case, the contractor had altered the CTIP posters to remove DoD IG Hotline number)

- No recruitment plan that used only approved recruitment companies
- No procedures in place to prevent trafficking and trafficking-related activities
- No adequate housing that met Saudi Arabia’s housing criteria, including no ovens for cooking, only propane burners to warm food; no filter for water to ensure safe drinking water (water was discolored and had bad smell) and no working air conditioners (faulty air conditioners had mold on them) – all required by Saudi labor law.

Upon interview, the contractor representative said he was unaware that they were required to submit documentation for compliance certification. Mr. Lucas also noted that the contractor did not report CTIP violations to DoDIG, even though violations were observed during spot-check (expired passports, unpaid employees, employee contracts lacking proper language, inability to verify whether recruitment fees were charged).

Mr. Lucas explained that he trains contracting officer’s representatives (CORs) and contracting officers throughout USCENTCOM and makes site visits to strengthen CTIP efforts across agencies, meet CTIP compliance standards across the area of operation, and inform key stakeholders of CTIP requirements, trends, and initiatives in support of operations within U.S. Army Central. Most of what they dealt with in the Middle East was forced labor, debt bondage, unlawful recruitment, and use of child soldiers.

Mr. Lucas concluded with advice for strengthening anti-trafficking work in acquisitions. He said, “There are things that need to happen with the FAR Clause to strengthen it. One of those things: During the pre-award phase, we should be able to look at the subcontractor and contractor allegations. In Saudi, we had people with no access to their passports and expired visas. Without those, the employees could not use Western Union and send money home, which is a hinderance. Eleven (11) months of a year they are working in another country, away from their family and sending money home to take care of generations of families. Sometimes there are 20-30 people at home they are taking care of with their salary. The other thing that happens is that some of the guys were paid in cash, so they were running around with cash in their pockets. Also, we have a requirement for annual certifications, but I have yet to see an annual certification. What is it – an email, certificate? I think the FAR can do a better job of giving an example of that requirement. We cannot look at contractors as our enemies, we must not miss opportunities to build relationships. We have an obligation as human beings to work to better the human experience.”

Federal Acquisition Regulation (FAR): Mr. Lucas provided an overview of the FAR and the overlap with the COR responsibilities. He explained that in 2015, six additional “shall not” provisions for contractors were added to FAR Clause 52.222-50. They were that contractors shall not:

- Deny access to personal documents
- Use misleading or fraudulent practices during recruitment
- Charge employees recruitment fees
- Fail to provide return transportation or pay for cost of return transportation at the end of employment
- Provide or arrange housing that does not meet host country standards
- If required by law fail to provide an employment contract, recruitment agreement, or other required work document in writing

Mr. Lucas concluded with two lessons learned:

1. To truly combat trafficking in persons, there needs to be a “you must and you shall” for CTIP duties and representatives because compliance is not clearly defined.
2. Nothing can replace boots on the ground, with regular interviews with all stakeholders, spot-checks, unannounced audits, and other “eyes on” work. This is the model for preventing trafficking that will work.

Featured Article

Thinking About CTIP in the Context of Threat and Risk Mitigation

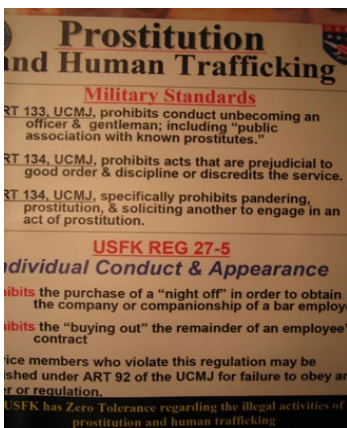
Contributed by: Combating Trafficking in Persons Office

Human trafficking is a crime and a human rights abuse. In the U.S. Department of Defense (DoD), human trafficking can threaten the safety and security of our supply chain for goods and services, affect warfighter readiness, create insider threats on our military installations, and tarnish DoD's image as a protector and defender of freedom around the world.

Engaging in trafficking and trafficking-related activities has been linked to waste, fraud, and abuse, blackmail, espionage, terrorism, "honeypot" schemes, bribery, and other criminal activities that weaken the ability of U.S. military forces at home and abroad. In addition, the U.S. has seen a rise in Defense Base Act lawsuits resulting from physical and mental injuries to workers claiming they were trafficked while working on military contracts, especially in conflict zones.¹

Over the past two decades, the DoD Combating Trafficking in Persons (CTIP) Office has developed policies, programs, and processes to prevent human trafficking and to intervene to stop human trafficking when it occurs in the military. Our anti-trafficking work are tools for DoD to use effectively to carry out its warfighter mission at home and abroad. In essence this is risk mitigation work that helps identify how human trafficking occurs in the DoD and prepares for and lessens the effects of human trafficking threats facing the DoD. Take a look at these cases of human trafficking that occurred in the DoD:

Bosnia-Herzegovina – In 2000, in response to multiple reports and incidents of human trafficking by U.S. contractors accompanying DoD in Bosnia-Herzegovina, the DoD Inspector General (DoDIG) launched an investigation which found that the over 20,000 contract employees, considered members of the Stabilization Force (SFOR) and Kosovo Force (KFOR) community, were not subject to the same off-base restrictions placed on U.S. Servicemembers. As members of SFOR and KFOR, contractor employees were not prohibited from patronizing establishments designated by the United Nations or the European Union Police Mission as off-limits because of illegal prostitution and human trafficking concerns. The investigation was driven by reports of contractors involved not just in the purchase of sex in bars and brothels in the area, but by incidents of actual purchase of persons for both labor and sex in contractor employee living quarters. The Department of Defense Inspector General audit investigation found that while some prime contractors made an effort to monitor their employees' activities and address employee misconduct, anecdotal evidence suggested some level of DoD contractor employee involvement in activities related to human trafficking in Bosnia-Herzegovina and Kosovo.²



Korea – In March 2002, during an undercover investigation near Camp Casey in South Korea, Fox News captured on video U.S. Army Military Police on "courtesy patrol" — armed and in uniform — patrolling bars and brothels where trafficked women were forced to prostitute themselves. U.S. soldiers were the primary customers of these bars; and reportedly the courtesy patrol officers were there at the behest of their commanders to intervene if any of the soldiers got into trouble. The report identified the women in the establishments as having been trafficked from the (at the time) Russian Federation, the Philippines, and within South Korea. The U.S. Military Police spoke candidly about the women's passports being held by the traffickers when they entered South Korea and about the women then being sold at "auctions" to bar owners — a classic scenario of human trafficking. A

¹ Chief Judge Richard Clark, Chief Judge of the Administrative Law Judges (OALJ) West Coast, U.S. Department of Labor West Coast Summit on Defense Base Act, who noted that the OALJ is seeing a "tsunami of Defense Base Act claims," many of them from Other Country Nationals who worked on U.S. military bases.

² "Assessment of DoD Efforts to Combat Trafficking in Person - Phases: Bosnia-Herzegovina

<https://ctip.defense.gov/CTIP-Audits/>

letter from Congress requesting an investigation said: "If U.S. soldiers are patrolling or frequenting these establishments, the military is in effect helping to line the pockets of human traffickers rather than furthering our country's commitment, as expressed by the Secretary of State, to "work closely with other governments, organizations and concerned people throughout the world to put an end to this abomination against humanity."³

Colombia – In 2012, a security team of U.S. Secret Service and U.S. military members assigned as advance guard for President Obama’s visit to an economic summit in Cartagena, Columbia were investigated after being reported to the U.S. Embassy for misconduct, by hotel workers and Colombian police, including heavy drinking and a trip to a strip club where the men allegedly paid women for sex in their hotel rooms. In addition to the Secret Service, 10 military members, including two Marine dog-handlers, five Army Special Forces members, two Navy explosive-ordnance experts, and one Air Force member were involved. Eight of the Secret Service men resigned or left their jobs, one had his security clearance revoked, and three others were charged with misconduct. On the military side, an investigation led to charges and courts-martial, dishonorable discharges, and revocation of security clearances. A Congressional inquiry found that while no classified materials were found in the hotel rooms of any of the Servicemembers, it was a clear security breach which threatened the U.S. President and U.S. officials attending the summit.⁴



U.S. Central Command (USCENTCOM) – Over the past two decades, the U.S. Military has outsourced its overseas base-support responsibilities to operate military facilities to private contractors for cooking, cleaning, laundry, security, and construction. From 2014 – 2020 there were hundreds of thousands of “Other Country Nationals” (OCNs) working on U.S. Military installations in the USCENTCOM region.⁵ They outnumbered both U.S. and local contract workers. DoDIG investigations and Government Accountability Office (GAO) Reports, that included interviews with the workers, their supervisors, contractors and subcontractors on the military installations, uncovered harsh working and living conditions, with pay as little as \$150 per month for 12-hour days, no time off, and no communication with the outside world (cellphones, computers, etc.). Workers said they were forced to pay large recruitment fees. The OCNs also said their passports were taken, forcing them to stay at jobs where they were being abused and “bait and switch” tactics were used on them to get them to sign degraded contracts for poorer paying jobs in conflict zones after being promised lucrative jobs in European or Gulf countries. Using internally developed risk assessment methods, the CTIP PMO identified hundreds of OCN employment contracts that included fraudulence in pay declaration, bank deductions from employees’ pay that could not be accounted for, fraud in medical examinations and arms qualifications, and payments to the subcontractor for the jobs. In several sites, the situations became “insider threats” because mistreated employees threatened the site managers on base in a war zone.⁶

Massachusetts and Virginia – In 2015, former Top Gun pilot Daniel Chase Harris, 31, of Virginia Beach, Virginia, was sentenced to 600 months in prison, followed by lifetime supervised release for his crimes including production of child pornography, use of a facility of interstate commerce to entice a minor to engage in criminal sexual activity, receipt of child pornography, transportation of child pornography, possession of

³ Letter from Congress and Response from Secretary of Defense <https://library.rumsfeld.com/doclib/sp/2638/2003-03-07%20from%20Joseph%20Schmitz%20re%20Korean%20and%20Human%20Trafficking%20After%20Trip%20Report.pdf> ; H03L88433128 (hyperlink to <https://ctip.defense.gov/Portals/12/IG%20Reports/DODIG%202003.pdf?ver=sFWgmpnQvqN6gaD7ftkojA%3D%3D>); see also <https://ctip.defense.gov/CTIP-Audits/>; See also Assessment of DoD Efforts to Combat Trafficking in Person - Phases: South Korea <https://ctip.defense.gov/CTIP-Audits/>

⁴ Senator Grassley and Susan Collins, Congressional Inquiry, May 23, 2012

⁵ Contractor Support of U.S. CENTCOM Military Operations 2013 – 2023

https://www.acq.osd.mil/log/LOG_CSD/CENTCOM_reports.html/FY23_2Q_5A_Apr2023.pdf ; See also Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: U.S. Central Command; [Evaluation of DoD Contracts Regarding Combating Trafficking in Persons: Afghanistan](#)

⁶ DoD Nominee for the Presidential Award for Extraordinary Efforts to Combat Trafficking in Persons, Harvey Leake Memo

child pornography and obstruction of justice. According to court records and the evidence at trial, Harris, a Lieutenant in the U.S. Navy and a Navy Top Gun graduate stationed at Naval Air Station Oceana, posed online as a teenage boy to convince young teen girls between the ages of 12 and 17 to send him risqué pictures of themselves. He then extorted the girls to send him additional sexually graphic and explicit images of themselves or he threatened them with posting the images online or sending the images to family or friends. Nine victims were involved in the case. In pronouncing the sentence, District Judge Mark S. Davis stated Harris' actions were "sadistic" and equated to "torture." After conviction, prosecutors alleged that Harris offered military secrets to Chinese officials if they would break him out of jail after he was found guilty.⁷

In 2023, three individuals were arrested in connection with operating sophisticated high-end brothels in greater Boston and eastern Virginia. Commercial sex buyers allegedly included elected officials, high tech and pharmaceutical executives, doctors, military officers, government contractors that possess security clearances, professors, attorneys, scientists and accountants, among others. According to the charging documents, the defendants operated an interstate prostitution network with multiple brothels in Cambridge and Watertown, Massachusetts, as well as in Fairfax and Tysons, Virginia. The defendants allegedly advertised their prostitution network on websites that offered appointments with women in either greater Boston or eastern Virginia, respectively. The websites purported to advertise nude Asian models for professional photography at upscale studios as a front for prostitution offered through appointments with women listed on their websites. The websites described a verification process that interested sex buyers undertook to be eligible for appointment bookings— including requiring clients complete a form providing their full names, email address, phone number, employer and reference.⁸

Commissaries and Exchanges – In 2013, after a fire in the Bangladeshi Rana Plaza garment sector killed over 1000 people who were trapped inside in hazardous working conditions, investigators discovered DoD brand T shirts and backpacks were being produced in some of the factories there. In 2021, the National Defense Authorization Act for Fiscal Year 2021 (Public Law No. 116-283, § 1078) provision suggested DoD resale agencies had weaknesses in their supply chains that made them vulnerable to goods produced through forced labor. DoD operates about 240 commissaries and 2,500 exchange facilities worldwide to enhance the quality of life of uniformed service members, their families, and retirees by providing groceries and retail goods at reduced prices. A recent GAO Audit (GAO-22-105056) found that DoD's resale organizations—its commissaries and military exchanges— have policies and processes related to preventing the resale of goods produced by forced labor. However, the resale organization's policies and processes vary and are inconsistent. Limited collaboration has resulted in a fragmented approach across the resale organizations to prevent the availability of goods produced with forced labor.⁹

As seen in the cases above, the tentacles of human trafficking can reach into and corrupt many aspects of the DoD – national security, cybersecurity and supply chains. TIP cases can become insider threats, create risk management issues, problems of waste, fraud, and abuse. They can negatively affect military families, undermine good order and discipline, and disrupt warfighter readiness. The Department of Defense Combating Trafficking in Persons Office offers general awareness and specialized trainings to inform DoD personnel about the risks and threats associated with human trafficking, provides indicators to identify human trafficking, and the means to report suspected incidents. Learn more and human trafficking and DoD's trainings at <https://ctip.defense.gov/>

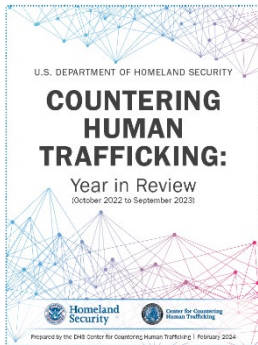
⁷ Department of Justice, <https://www.justice.gov/usao-edva/pr/former-navy-top-gun-instructor-found-guilty-charges-production-child-pornography-and>

⁸ Department of Justice, <https://www.justice.gov/usao-ma/pr/operators-high-end-brothel-network-indicted-grand-jury>

⁹ Government Accountability Office Audit, GAO 22-105056, February 2022

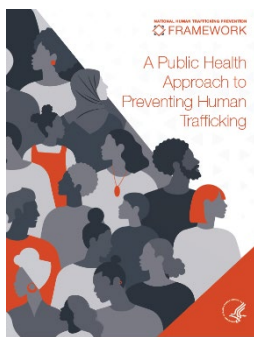
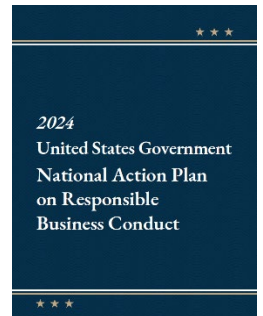
<https://ctip.defense.gov/Portals/12/GAO%20Reports/Final%20Report%20GAO-22-105056.pdf?ver=6dXFsp0tw43VLvVdCWC9w%3d%3d>

Interagency Activities



The Department of Homeland Security (DHS) released the [Countering Human Trafficking Year in Review Report](#) for FY23. The Countering Human Trafficking Year in Review reports on select accomplishments and advancements made by DHS offices and components towards countering human trafficking. These annual reports include links to additional informative resources that explain DHS's counter-trafficking operations, outreach, and other efforts.

On March 20, 2024, the Biden Administration released the second [National Action Plan on Responsible Business Conduct \(NAP\)](#). The NAP reflects a commitment to strengthen and improve respect for human rights and labor rights, expand use of green energy, counter corruption, protect human rights defenders, advance gender equity and equality, and promote rights-respecting use of technology.



The Department of Health and Human Services (HHS), Administration for Children and Families, Office on Trafficking in Persons, released [A Public Health Approach to Preventing Human Trafficking](#) report. The report adopts established concepts of violence prevention to outline strategies and approaches that can help develop and enhance human trafficking prevention efforts.

DoD CTIP Program Office Updates

The CTIP Office chaired the CTIP Task Force meeting on April 10, 2024. The CTIP PMO invited two guest speakers for the meeting. Mr. William M. Lucas, Quality Assurance Specialist (CTIP), 408th Regional Contracting Center-Kuwait discussed their CTIP Program. Mr. Neil Getzlow, spoke about his experience as a former buyer of commercial sex. This was part of a discussion about demand reduction and the risks of purchasing sex.

The CTIP PMO participated in the quarterly Senior Policy Operating Group (SPOG) meeting on May 9, 2024. The Director of Defense Support Services Center, and the CTIP Program Director represented the DoD. The CTIP Office submitted updates on the DoD's recent CTIP activities including the Government Accountability Office Audit (Contract Requirements to Combat Trafficking in Persons—code 106973), the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2024 and Senate Armed Services Committee (SASC) Report accompanying NDAA, the CTIP Task Force meeting, the training updates (CTIP Refresher Course, DoD Healthcare, DoD Judge Advocate, and DoDEA) and the site visit to U.S. INDO-PACIFIC Command. The SPOG consists of senior officials designated as representatives of the President's Interagency Task Force.



The CTIP Office worked with the Defense Health Agency, Continuing Education Program Office (CEPO) to obtain the continuing education credit for 15 specializations for the [CTIP Healthcare Professional Training](#) available on Joint Knowledge Online. Healthcare providers are often the first point of

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contact for victims of human trafficking. They must be able to recognize potential cases of human trafficking in a DoD hospital or healthcare setting and respond effectively. The Healthcare Training addresses issues not found in general trainings on human trafficking including, signs and indicators of trafficking in the chief complaint, medical history, and medical exam; how to respond when trafficking is suspected or uncovered, including treatment, referral, reporting, and follow-up; best practices for health providers who have direct contact with patients; and using New ICD-10 diagnostic codes for sex and labor trafficking as well as how to record human trafficking in electronic medical records.

NEW TRAINING REQUIREMENT! The CTIP Office released the [CTIP General Awareness Refresher](#) course. The training is required for all DoD personnel every two years per Public Law 117-348, “Trafficking Victims Prevention and Protection Reauthorization Act of 2022.” The requirement begins in June 2024 and mandates the course include the necessary knowledge and tools to prevent, recognize, report, and address human trafficking offenses. CTIP Specialized trainings may be taken in lieu of the CTIP Refresher Course.

Find an overview of the current CTIP trainings, their current required intervals, and FAQs on the CTIP Refresher Course on the [CTIP website](#).

New Course Numbers! The CTIP PMO updated the course numbers on JKO to the following:

- [CTIP -US018-A](#) CTIP General Awareness Refresher Course
 - [CTIP-GA-US011](#) Combating Trafficking in Persons (CTIP) General Awareness
 - [CTIP-AP-US012](#) Combating Trafficking in Persons (CTIP) for Acquisition and Contracting Professionals Course
 - [CTIP-IP-US013](#) Combating Trafficking in Persons (CTIP) for Investigative Professionals
 - [CTIP-EA-US014](#) Combating Trafficking in Persons (CTIP) DoDEA Web-based Training
 - [CTIP-LDR-US015](#) Combating Trafficking in Persons (CTIP) Resource for Leaders
 - [CTIP-HC-US016](#) Micro training: Combating Trafficking in Persons (CTIP) Healthcare and Human Trafficking
 - [CTIP-CH-US017](#) Micro Training: Combating Trafficking in Persons (CTIP) Chaplains Course
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Check out the CTIP Website! The [website](#) includes tabs for the CTIP Trainings, the CTIP Student Guide to Preventing Human Trafficking, and Acquisition Resources.



Follow us on social media! The CTIP PMO is now on [Facebook](#), [Twitter](#), [YouTube](#), and [LinkedIn](#)!



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Upcoming Events

- CTIP Site Visit to USINDOPACOM on June 4-7, 2024
- The next CTIP Quarterly Task Force meeting will be July 10, 2024