CEDAW Secretariat

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19 February 2019

**Re: Draft General Recommendation on Trafficking of Women and Girls   
in the Context of Global Migration**

Dear Distinguished Committee Members:

We respectfully submit this statement to the Committee on the Elimination of Discrimination against Women (“the Committee”) for consideration during its 72nd session (18 February - 8 March 2019), as part of the general discussion to prepare the elaboration by the Committee of a General Recommendation on trafficking in women and girls in the context of global migration. This joint submission of the Chicago Alliance Against Sexual Exploitation (CAASE) and the Center for International Human Rights (CIHR) of Northwestern Pritzker School of Law focuses specifically on the exploitation of women and girls through the mechanism of sex trafficking, from the perspective of the United States as a destination country for trafficked women and girls. This submission may be published on the CEDAW website for this General Recommendation.

**The Chicago Alliance Against Sexual Exploitation (CAASE)** is a non-governmental, non-profit organization that opposes sexual harm and exploitation by directly addressing the culture, institutions, and individuals that perpetrate, profit from, or support such harms. CAASE addresses sexual violation through prevention education, community engagement, policy reform, and direct legal services to survivors of sexual exploitation and assault including victims of trafficking.   
  
**The Center for International Human Rights (CIHR) of Northwestern Pritzker School of Law** is a non-governmental, non-profit organization located in Chicago, Illinois, United States. CIHR is dedicated to human rights education and to legal and policy-focused human rights advocacy within the United States and worldwide. CIHR conducts legal research, compiles reports, and represents individuals and NGOs in cases and projects addressing violations of human rights. CIHR is in special consultative status with the United Nations Economic and Social Council (ECOSOC).

The Committee has requested stakeholder input on a number of issues, including “[t]he provision of appropriate assistance and services to victims of trafficking, including both short term as well as comprehensive, survivor-centered, long term services” and “[c]larifying the intersections of States’ parties legal obligations on combatting trafficking and promoting safe, regular, and orderly migration.”[[1]](#footnote-2) This submission seeks to provide input on these two issues from the perspective of the United States, as a destination country both for trafficked women and girls and for women and girls seeking asylum and refugee status due to persecution in their home countries.

**I. States Parties Must End Criminalization of Victims of Sex Trafficking, Provide Access to   
Comprehensive Legal Options to Remedy Previous Criminalization, and Identify Trafficked Women and Girls within Criminal Systems**

States, including the United States, regularly prosecute and criminalize the victims of sex trafficking for crimes they commit due to force or other coercion imposed by the trafficker and as a direct result of the trafficking suffered.[[2]](#footnote-3) This focused criminalization of victims allows perpetrators to continue operating unfettered, while perpetuating the continued victimization and/or revictimization of survivors. States must focus on providing adequate access to the legal justice system and services to survivors, while focusing their criminal prosecutions on the traffickers, the true perpetrators of trafficking crimes.

**A. Criminalization of Victims of Sex Trafficking**

In its Concept Note, the Committee recognizes that “some survivors may be prosecuted for migration offences such as unauthorized departure or other offences resulting from being trafficked, including irregular entry into a country and overstay of visas …” and specifically calls out “the link between women’s limited access to justice and the high levels of impunity enjoyed by perpetrators of trafficking.”[[3]](#footnote-4) Human traffickers use force, threats, or coercion to manipulate the women and girls they sexually traffic into carrying out acts that, on their own, constitute crimes in many countries. In fact, the mere participation in selling sex constitutes a crime in most parts of the United States and many other countries. As a result, trafficked women and girls regularly face prosecution for prostitution and related crimes.[[4]](#footnote-5) Uncertain immigration status or lack of proper immigration documentation compounds this issue, as the threat of prosecution for immigration-related offenses and ultimately deportation also hangs over undocumented women and girls. This direct prosecution of victims perpetuates continued victimization and/or revictimization and impedes victims’ access to remedies — as they fear exposing their own “crimes” if they come forward for assistance — while allowing perpetrators to continue operating with impunity.

In the United States, when women or girls are arrested for these offenses, their traffickers often pay for their bail bond and legal representation in court, which furthers the trafficker’s control over their victims and their ability to coerce these women. Because these women now have a criminal charge on their record, they become further tied to their trafficker, since these criminal charges limit their ability to be self-sufficient. They cannot find housing, employment, or other opportunities due to their criminal history. Women and girls who are trafficked across borders face not only these limitations on self-sufficiency by the criminalization of their forced actions, but also fear criminalization of their status as undocumented migrants, facing prosecution for immigration-related offenses and ultimately deportation. The prosecution of women who are sexually trafficked does nothing but perpetuate their victimization.

**B. Recent Developments in the United States, Illinois, and Chicago to Address   
 Criminalization of Victims**

As organizations focused on the provision of legal services and law-related policy, CAASE and CIHR have chosen to focus this section on the need for assistance and services to victims of sex trafficking within the legal system, particularly the criminal justice system. States’ provision of comprehensive, survivor-centered services must include both short-term and long-term supports in their legal systems to trafficking survivors in order to keep women and girls from remaining in a cycle of trafficking. This legal system assistance must include: recognition of juvenile victims as inherent victims of trafficking; provision of alternative programs within the criminal justice system for women victims; and remedies and relief for victims saddled with criminal records for “crimes” they committed as a direct result of their trafficking.

**1. Ending Criminalization of Juvenile Victims**

In the United States, thirty-four states have “safe harbor” laws in place to avoid prosecuting juvenile trafficking victims — those under the age of 18 — for prostitution offenses.[[5]](#footnote-6) These safe harbor laws generally contain three components: (1) decriminalization of juvenile victims found to be participating in prostitution; (2) diversion from the official criminal justice system; and (3) provision of social services.

The Illinois Safe Children Act[[6]](#footnote-7) provides immunity from criminal charges and prosecution for juveniles found to be engaging in prostitution. The law recognizes that children cannot be classified as criminals engaging in prostitution but rather must be seen as victims of sexual exploitation, as defined under United States federal law.[[7]](#footnote-8) Under the Safe Children Act, law enforcement officers must refer children found to be engaging in prostitution to the state’s child welfare agency — the Illinois Department of Children and Family Services (DCFS) — so that these children may be treated as sex trafficking victims, rather than criminals, and provided appropriate social services. Acknowledging a girl’s status as a victim rather than a juvenile delinquent moves the focus of her care by the State away from punishment and discipline to rehabilitation and recovery from the trauma brought on by trafficking and her lack of control over these actions. This decriminalization of juvenile victims also helps to enforce laws against traffickers because these perpetrators are automatically identified as the only culpable parties in these situations.

**2. Creating Alternative Programs within the Criminal Justice System to Better Identify and**

**Assist Women Trafficking Victims**

While it remains preferable for victims of trafficking to be identified before they suffer criminal consequences, oftentimes victims remain unknown to the legal system until they are arrested and charged with a crime directly related to the consequences of their trafficking. When this situation occurs, States must provide alternatives to the standard criminal justice system to assist in the identification of victims and ensure they are diverted from criminal consequences to social service assistance.

In Chicago, two innovations within the criminal justice system assist officials in identifying sex trafficking victims after they have been charged as criminals: (1) the Chicago Prostitution and Trafficking Intervention Court (CPTI) program and (2) an affirmative defense of trafficking to prostitution charges.

The CPTI program was created to address misdemeanor prostitution cases; defendants charged with either engaging in prostitution or soliciting a ride or business as a pedestrian qualify for participation in this program.[[8]](#footnote-9) The purpose of CPTI is to provide defendants an opportunity to engage in social services designed to divert them from further participation in prostitution, in exchange for the State dropping criminal charges. Often a defendant merely has to make an attempt to engage in services — such as making an appointment with a social worker — in order to avoid conviction in these cases. While there continue to be a number of issues remaining with the CPTI program (including the lack of trauma-informed social workers to cover all defendants in the system), officials in the program remain hopeful that requiring defendants to engage with social service programs will allow them to self-identify as trafficking victims in need of more comprehensive and holistic assistance to escape the trafficking situation.

In 2015, Illinois passed a law instituting an affirmative defense for persons charged with prostitution, allowing them to show that they engaged in prostitution as a result of human trafficking as defined by state law.[[9]](#footnote-10) This law also creates a procedure for courts to follow if the defendant is concerned about the safety of raising the affirmative defense in open court, where their trafficker or associates may be observing the proceedings. This procedure allows defendants to identify as a trafficking victim directly to the court and prior to being required to engage with social services, also providing more control over how they will proceed in removing themselves from trafficking situations.

**3. Providing comprehensive relief and remedies for criminal record expungement**

Due to the long-term failure of the United States to recognize trafficked women and girls as victims rather than criminals, many of these victims are followed by criminal records that impede their ability to access social services and to achieve self-sufficiency. Long-term legal assistance is needed so victims of trafficking are able to distance themselves from their trafficker, move forward without a criminal record, have access to housing and job opportunities, and put aside fear of deportation. Laws that allow for the vacatur, expungement, and sealing of criminal records can accomplish this goal.

In Illinois, women who have been victims of sex trafficking have access to post-trial motions to vacate prostitution offenses[[10]](#footnote-11) and to expunge underlying arrests and other related convictions.[[11]](#footnote-12) Additionally, in 2018, the Illinois law on sealing of criminal records was expanded to include the sealing of records of arrests and convictions for many crimes if the requestor can show the crimes were committed as a result of any form of human trafficking.[[12]](#footnote-13) These laws help to ensure that previous criminal records do not follow a trafficking victim for the rest of her life, allowing her to recover and move closer to self-sufficiency.

While these laws are a good start to reducing the ongoing criminalization of trafficking victims, a number of arrests and convictions fall through the cracks merely due to how victims were charged. Other States seeking to emulate these innovations should assess the many ways victims are criminalized and ensure that similar expungement and vacatur procedures cover many of the collateral crimes with which a victim may be charged due to her status as a trafficking victim.

**4. Providing Immigrant Women Security and Safety in the Legal and Immigration Systems to Encourage Assistance in Identifying and Prosecuting Traffickers**

Women and girls who are trafficked across borders for commercial sexual exploitation often exist in a climate of fear that encompasses the possibility of criminalization not only due to their unwilling participation in prostitution, but also due to their uncertain immigration status. This possible two-level criminalization inhibits and chills victims’ willingness to self-identify as trafficking victims and to seek justice against their perpetrators. Traffickers often use this fear to maintain control over their victims, threatening to report them to immigration authorities, such as the U.S. Immigration and Customs Enforcement (ICE), if they fail to follow the traffickers’ orders. Additionally, recent external circumstances compound victims’ fears of coming forward, such as the current wave of fear among immigrant women and girls in abusive situations of being arrested at the courthouse while seeking protection against their abusers.

Recognizing the vulnerability of undocumented migrant women and girls to trafficking requires providing special protection in these situations to encourage more victims of trafficking to come forward against their traffickers. For example, the Illinois TRUST Act, enacted in 2017, protects undocumented immigrants from being arrested for their immigration status at a courthouse unless a “valid, enforceable federal warrant” exists for their arrest.[[13]](#footnote-14) Similar laws can be used by States parties to positively impact the lives of immigrants who are victims of trafficking because they protect these victims’ right to justice and encourage law enforcement and the justice system to prosecute perpetrators rather than the victims.

Moreover, offering special and protected immigration statuses can ensure immigrant trafficking victims feel protected and safe while participating in the prosecution of their traffickers. The United States offers three different types of visas to immigrant women and girls who have been trafficked: T visas, U visas, and VAWA visas. In varying ways, these visas encourage women and girls who have been trafficked to assist law enforcement in prosecuting their traffickers by allowing them to remain securely in the United States.

The T visa was created in response to the dual need for victim assistance and the prosecution of the perpetrators of trafficking. The 2000 Trafficking Victims Protection Act (TVPA)[[14]](#footnote-15) created the “T visa,” which allows victims to stay in the United States if they cooperate in the criminal investigation or prosecution of their trafficker.[[15]](#footnote-16) T visa recipients can remain in the United States for up to four years and receive work authorization.[[16]](#footnote-17) T visa recipients can then apply for adjustment to legal permanent resident status either when the government has closed the criminal case (investigation or prosecution) against their trafficker or after three years, whichever happens sooner.[[17]](#footnote-18)

The TVPA also created the “U visa,” which similarly requires a victim’s willingness to participate in the investigation or prosecution of a criminal case.[[18]](#footnote-19) The U visa, which is broader than the T visa, includes other crimes in addition to trafficking, such as sexual assault.[[19]](#footnote-20) While immigration practitioners generally prefer to have trafficking victims apply for a T visa, the U visa has been beneficial in cases where women have histories of trafficking victimization but do not have enough information about their traffickers to sufficiently assist in the case for a T visa.

The Violence Against Women Act “VAWA” visa is another option for trafficking survivors if their trafficker is a spouse or other family member.[[20]](#footnote-21) This allows women to seek legal residency without the sponsorship of this abusive relative and can encourage women to leave a dangerous trafficking situation.

These visa programs provide a potential path to citizenship for trafficking victims who meet the applicable requirements. By allowing trafficked individuals to remain in the United States, these visa programs limit further disruption to a woman’s life and better encourage recovery. These visas encourage women who have been trafficked to seek help from authorities and identify perpetrators.

Unfortunately, though, these visa programs have not assisted as many individuals as they should due to barriers in the application process. For instance, undocumented victims are often afraid to go to the authorities due to fear of deportation, and the application process is very involved and difficult without a lawyer. These issues are compounded by a general lack of information among the public and even among immigration law practitioners. As a result of these issues, the government grants far fewer visas than it should. In spite of these barriers within the application and granting process, the creation of these visa programs provides necessary options for women and girls who have been trafficked to gain legal status. Other States wishing to emulate these programs can improve on this system by ensuring proper and complete information is widely communicated in a variety of languages and venues where trafficking victims may encounter it.

**C. Recommendations on Ending Criminalization of Trafficked Women and Girls and**

**Providing Appropriate Legal Assistance**

While not completely devoid of problems, the laws and policies implemented in the United States, specifically in Illinois and Chicago, that are described above provide important insights to guide States parties’ in providing appropriate legal assistance and services to trafficked women and girls. Based on these policies and the experiences of the organizations providing this submission, we respectfully recommend the Committee include the following points in its General Recommendation on the trafficking of women and girls in the context of global migration:

***Recommendation: States Parties must create and implement laws and policies targeted toward ending the criminalization of trafficked women and girls, specifically:***

* 1. ***Fully institute laws to ensure juveniles under the age of 18 who are engaged in prostitution are identified as victims of trafficking and offered age-appropriate, trauma-informed, and survivor-centered services;***
  2. ***Create programs that operate as alternatives to the traditional criminal justice system to address crimes with which trafficked women and girls are regularly charged, including prostitution and collateral offenses, as well as immigration-related offenses;***
  3. ***Address past criminalization of trafficked women and girls by providing comprehensive remedies to clear criminal records that cover the myriad crimes with which victims have been charged; and***
  4. ***Provide trafficked women and girls with various legal immigration options that not only offer safety and security for their immigration status but also encourage engagement and participation in the prosecution of traffickers.***

#### **II. States parties must revoke border entry policies that increase migrants’ vulnerability to**

#### **trafficking by preventing asylum-seekers from crossing a border in a timely manner**

State policies that have the purpose or effect of impeding access to the asylum application process increase the vulnerability of migrants, particularly women and girls, to trafficking. Migrants fleeing persecution have the right to apply for asylum in the countries in which they seek refuge. State policies that impede their ability to do so are incompatible with the right to asylum. These policies are particularly dangerous when they lead to situations where hundreds or thousands of migrants are encamped at a border, unable to enter the country of refuge to apply for asylum. Women and girls trapped in such encampments face a heightened risk of becoming victims of traffickers.

The current situation at the United States-Mexico border has created increased vulnerability to trafficking for the migrants attempting to enter the United States. Fleeing extreme violence in their home countries – notably Honduras, El Salvador and Guatemala, but other countries as well – thousands of migrants have traveled to the United States-Mexico border in order to apply for asylum in the United States.[[21]](#footnote-22) In contrast to earlier waves of migration, the people fleeing violence in these three Central American countries include a large percentage of women and girls. The journey from their home countries to the U.S. border is an arduous and dangerous one, and so in order to reduce the dangers they encounter along the way, many migrants in this current wave of migration have chosen to travel in groups, termed “caravans.”[[22]](#footnote-23)

In response to this development, the United States has adopted practices to impede the ability of these migrants to exercise their right to apply for asylum in the United States. First, the Government has put in place a new policy of “metering” at the border. Under this policy, an artificial limit has been placed on the number of migrants who are allowed on any particular day to enter the country and apply for asylum at official border crossings. Although thousands of migrants are waiting to enter, observers report that the number allowed in daily is less than 100 on an average day, and often in the range of only 40 to 60.[[23]](#footnote-24)

This past November, President Trump issued a proclamation under which migrants would be barred from applying for asylum if they entered the country illegally instead of at an official border crossing.[[24]](#footnote-25) This policy was challenged in court, and for now, the policy has been enjoined;[[25]](#footnote-26) it is possible, though, that this injunction will be lifted on appeal. If so, this policy will combine with the metering policy to create an even worse bottleneck of migrants trying to enter the country to apply for asylum.

These practices have resulted in thousands of people languishing at the border under deplorable conditions, desperate for any way out of their situation. The Mexican Government has set up an open-air encampment at a sporting stadium to house many of the people waiting to enter the United States; other people have been sent to over-crowded shelters and warehouses where conditions are intolerable.[[26]](#footnote-27) For these migrants, Mexico has been turned into “a giant waiting room,” where people exist in “a pressure cooker.”[[27]](#footnote-28) This creates the perfect circumstances for traffickers to prey on these migrants.

As there is no system for monitoring or identifying the flow of persons coming in and out of these shelters, warehouses and open air encampments, women and girls become easy targets for traffickers.[[28]](#footnote-29) In the case of refugees seeking asylum, the lengthy waiting time before they are allowed to enter the United States and apply for asylum increases their exposure to being trafficked.[[29]](#footnote-30) Indeed, advocates who have worked with recent migrants along the U.S.-Mexico border have reported that lack of food and water, long wait times, and the threat of organized crime have contributed to increased vulnerability to trafficking. There are multiple reports of men coming to the camps and luring away women and children by offering them a warm place to sleep with a roof over their head.[[30]](#footnote-31) These men are often involved with organized crime and are believed to have begun trafficking the women and children.[[31]](#footnote-32)

The United States is not the only place where States, by their actions and omissions, have impeded migrants fleeing persecution from exercising their right to apply for asylum in a timely manner. In order to eliminate vulnerabilities to trafficking, States must implement policies that avoid creating massive buildups of refugees at ports of entry.

***Recommendation: States parties must implement policies that allow asylum seekers to enter the country to seek asylum without delay, specifically:***

1. ***Implement policies and provide sufficient staffing at borders to enable asylum seekers to enter without delay, in order to avoid situations where large numbers of migrants languish at the border in conditions that foster human trafficking scenarios;***
2. ***End policies such as “metering” that block refugees from entering a country to apply for asylum; and***
3. ***Educate asylum officers and other border control personnel to the various signs of human trafficking in order to intervene to protect individuals who are being exploited.***

CAASE and CIHR thank the CEDAW Committee for this opportunity to provide our observations and recommendations on trafficking in women and girls in the context of global migration and to contribute towards the Committee’s guidance.

Sincerely,



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1. Para. 34 of Concept Note. [↑](#footnote-ref-2)
2. Unless otherwise noted, the information, facts, and statements provided in Section I are based on the knowledge and expertise of CAASE and other legal practitioners working directly and on behalf of survivors of sexual exploitation and/or human trafficking. [↑](#footnote-ref-3)
3. Para. 34 of Concept Note. [↑](#footnote-ref-4)
4. Legal service providers in Chicago, including CAASE, have represented trafficked women who have been charged and convicted of prostitution crimes, as well as a variety of collateral crimes, including but not limited to, solicitation of a ride, indecent exposure, disturbing the peace, possession of illegal drugs, and driving without a license. Law enforcement officers in Chicago have acknowledged to CAASE that these collateral crimes are often charged, even if the underlying facts dictate the appropriate charge would be prostitution, because less evidence is required to prove these collateral charges and therefore require less investigation and evidence-gathering by law enforcement. [↑](#footnote-ref-5)
5. United States Department of State, *Trafficking in Persons Report June 2018*, at 444, https://www.state.gov/j/tip/rls/tiprpt/2018/. [↑](#footnote-ref-6)
6. Illinois Safe Children Act, Ill. Pub. Act 96-1464 (2010); more information available at: End Demand Illinois, <http://media.virbcdn.com/files/cc/0a246ae6b272c82a-ILSafeChildrenActSummaryNov2010FINAL.pdf>. [↑](#footnote-ref-7)
7. Trafficking Victims Protection Reauthorization Act, 22 U.S.C. 78 (2013). [↑](#footnote-ref-8)
8. *Chicago Prostitution and Trafficking Intervention Court: A Coordinated Initiative*, http://www.cookcountycourt.org/Portals/0/Chief%20Judge/Prostitution%20Court/prostitution%20court%20fact%20sheet.press.pdf [.](http://www.cookcountycourt.org/Portals/0/Chief%2520Judge/Prostitution%2520Court/prostitution%2520court%2520fact%2520sheet.press.pdf) The criminal charges that qualify for this court are codified at 720 ILCS 5/11-14 and 625 ILCS 5/11-1006 (a) and (b). [↑](#footnote-ref-9)
9. Ill. Pub. Act 99-0109, amending 720 ILCS 5/11-14 and 725 ILCS 5/115-6.1, effective July 22, 2015. [↑](#footnote-ref-10)
10. Illinois Code of Criminal Procedure, 725 ILCS 5/116-2.1, http://www.ilga.gov/legislation/ilcs/ilcs4.asp?DocName=072500050HArt%2E+116&ActID=1966&ChapterID=54&SeqStart=34300000&SeqEnd=35000000. [↑](#footnote-ref-11)
11. Illinois Criminal Identification Act, 20 ILCS 2630/5.2, as amended (2018). [↑](#footnote-ref-12)
12. *Id.* at 5.2(h). [↑](#footnote-ref-13)
13. Illinois TRUST Act, 5 ILCS 805, http://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=100-0463. [↑](#footnote-ref-14)
14. Trafficking Victims Protection Act, 22 U.S.C. 78 (2000). [↑](#footnote-ref-15)
15. United States Citizenship and Immigration Services, Victims of Human Trafficking: T Nonimmigrant Status, https://www.uscis.gov/humanitarian/victims-human-trafficking-other-crimes/victims-human-trafficking-t-nonimmigrant-status. [↑](#footnote-ref-16)
16. *Id*. [↑](#footnote-ref-17)
17. *Id*. [↑](#footnote-ref-18)
18. United States Citizenship and Immigration Services, Victims of Criminal Activity: U Nonimmigrant Status, https://www.uscis.gov/humanitarian/victims-human-trafficking-other-crimes/victims-criminal-activity-u-nonimmigrant-status/victims-criminal-activity-u-nonimmigrant-status. [↑](#footnote-ref-19)
19. *Id*. [↑](#footnote-ref-20)
20. United States Citizenship and Immigration Services, Battered Spouse, Children, & Parents, https://www.uscis.gov/humanitarian/battered-spouse-children-parents. [↑](#footnote-ref-21)
21. ##### National Public Radio, *Fact Check: What's Happening On The U.S.-Mexico Border?*, National Public Radio, 27 Nov. 2018, <https://www.npr.org/2018/11/27/670807343/fact-check-whats-happening-on-the-u-s-mexico-border?t=1550427751360><%22.

    [↑](#footnote-ref-22)
22. ##### *Id*. Since the most recent caravan began four months ago in Honduras, over 5,000 people have arrived at the United States-Mexico border, many seeking to apply for asylum upon entering the United States. *Id*.

    [↑](#footnote-ref-23)
23. The Guardian, *'I don't Want to Go Back': What's Next for the Central American Migrant Caravan?*, The Guardian, 8 Dec. 2018, https://www.theguardian.com/world/2018/dec/08/central-american-migrant-caravan-tijuana. [↑](#footnote-ref-24)
24. Miriam Jordan, *Federal Judge Blocks Trump’s Proclamation Targeting Some Asylum Seekers*, The New York Times, 20 Nov. 2018, https://www.nytimes.com/2018/11/20/us/judge-denies-trump-asylum-policy.html. [↑](#footnote-ref-25)
25. *Id.* [↑](#footnote-ref-26)
26. NGO advocates working with asylum seekers at the border have noted these conditions in interviews. [↑](#footnote-ref-27)
27. *Id*. [↑](#footnote-ref-28)
28. *Id*. [↑](#footnote-ref-29)
29. Alfredo Corchado and Dianne Solis, *Are Trump’s Policies Making Life More Dangerous for Immigrants on the Mexico Side of the Border?*, Dallas News, 14 Dec. 2018, https://www.dallasnews.com/news/immigration/2018/12/14/trumps-policies-making-life-dangerous-immigrants-mexico-side-border. [↑](#footnote-ref-30)
30. NGO advocates working with asylum seekers at the border have noted these conditions in interviews. [↑](#footnote-ref-31)
31. *Id.* [↑](#footnote-ref-32)