



GENERAL POLICE ORDER CLEVELAND DIVISION OF POLICE



EFFECTIVE DATE: MARCH 17, 2008	REVISED DATE:	NO. PAGES: 1 of 3	NUMBER: 4.1.13
SUBJECT: INVESTIGATION OF HUMAN TRAFFICKING			
ASSOCIATED MANUAL:		RELATED ORDERS:	
CHIEF OF POLICE: <i>Michael McGrath, Chief</i>			

PURPOSE: To provide guidance for the proper investigation of Human Trafficking.

POLICY: The Cleveland Division of Police shall investigate complaints of Human Trafficking and enforce all laws that may relate to the practice of Human Trafficking. When applicable, the Cleveland Division of Police shall notify and assist federal agencies in investigations that involve the violation of federal statutes regarding Human Trafficking.

DEFINITIONS: Section 108(3) of the Federal Victims of Trafficking and Violence Protection Act of 2000 defines a “severe” form of Human Trafficking as:

- Sex trafficking in which a commercial sex act is induced by force, fraud or coercion or in which the person is induced to perform such act is under the age of 18, or
- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjecting that person to involuntary servitude, peonage, debt bondage, or slavery.

The Northern Ohio Intelligence Working Group defines human trafficking as: Those activities in which individuals are transported through illicit means either into the United States or across state lines within the U.S. to work in various industries. These industries may include sex workers, prostitution, massage-parlors, night-club dancing, domestic service, cleaning service (often hotel), construction (generally home), manufacturing (“sweat shops”), migrant farming, food processing (often meat packing, canning), and others.

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PROCEDURES:

- I.** Officers receiving complaints or assignments that may have elements of human trafficking shall gather all available information and make all reports and arrests as applicable. If arrests or crime reports are made, they shall be for crimes under city ordinances or state statutes (kidnapping, rape, prostitution...). The sector or unit supervisor shall make the determination if the elements of human trafficking are evident. Further assistance can be had 24 hours a day by calling the Trafficking Information and Referral Hotline at 1-888-373-7888 (This number also provides information for local victim referral services). The sector or unit supervisor shall contact the Officer-in-Charge (OIC) of the Intelligence Unit when the supervisor has determined that the circumstances fit the criteria of human trafficking. Non-crime reports shall also be referred to the OIC of the Intelligence Unit for follow-up.
- II.** Record Management System (RMS) reports that involve elements of human trafficking shall have Human Trafficking in the title (i.e. Kidnapping/Human Trafficking or Prostitution/Human Trafficking).
- III.** The OIC of the Intelligence Unit shall review all cases of possible human trafficking and recommend the proper course of investigation and notification of federal agencies as applicable.
- IV.** Indicators of Human Trafficking: The following is a non-exhaustive list of possible indicators of human trafficking activity as adapted from the FBI Directorate of Intelligence:
 - A.** Reports of organized criminal groups, gangs, document forgers, brothel owners, corrupt police or immigration officials involved in human trafficking activities.
 - B.** Reports or rumors of drop-house operators or safe houses providing temporary quarters for illegal aliens upon entry into the United States.
 - C.** Reports of motel operators providing fee-based lodging and food services to trafficking operations.
 - D.** Claims or reports of an influx of undocumented workers in farming/plant towns.

- E. Claims or reports of employee replacement with migrant workers.
- F. Wages of illegal aliens diverted/garnished by employers, overseers.
- G. Businesses known to hire undocumented aliens as employees, (i.e. construction, sweatshops).
- H. Ethnic-based businesses and organizations that provide low-wage employment to undocumented immigrants.
- I. Evidence of individuals who were trafficking into the United States against their will or under false pretenses.
- J. Evidence of debt bondage, victim isolation, forced labor (coercion, psychological pressure), physical abuse (injury), denial of document paper(s) and accesses, threats to family members.
- K. Families reporting lost/missing contact with relatives who paid traffickers.
- L. Chatter in ethnic enclaves of assistance provided to would-be refugees seeking sanctuary in the United States.
- M. Evidence of well-equipped forgery workshops that are being used to create false travel documents; interest in, or acquisition of, identification replication software programs; presence of forced or altered documents.
- N. Reports of bulk purchases of money orders.
- O. Diversification of criminal activities; trafficking is combined with other organized crime, illegal commodities and services.