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Report on the Unaccompanied Alien Children (UAC) Program: Field Findings and Systemic Failures

Introduction

My research partner, Dr. Jarrod Sadulski, and I have conducted extensive fieldwork on U.S. border operations, interviewing human traffickers, cartel members, whistleblowers, and Unaccompanied Alien Children (UACs). Our findings confirm that the UAC Program has devolved into an "assembly line of exploitation," where federal policies, NGO mismanagement, and cartel infiltration create cascading vulnerabilities. These failures not only imperil vulnerable children but also erode national security, demanding urgent reforms to safeguard lives and borders.

Response to Senate Testimony on Unaccompanied Alien Children (UAC) Exploitation

Thank you for highlighting these issues from my testimony - I stand them fully. UACs often arrived at U.S. borders with prewritten instructions from unidentified handlers, directing them to request named sponsors. Paired with the Biden Administrations' accelerated sponsor placement process, this created an "assembly line of exploitation," funneling children into trafficking networks with minimal safeguards. Drawing from field research, whistleblower interviews, and documented cases, here's how we found cartels exploited the system.

Question 1: How Cartels Exploited the Sponsor System

1. Coached Instructions and Fraudulent Sponsor Requests

- Cartel operatives coached children en route to memorize or carry sponsor details, bypassing initial vetting. Without mandatory DNA testing by Customs and Border Protection (CBP), familial claims go unverified, releasing minors to unvetted individuals.
- Example: We personally saw UACs as young as 8 have presented identical handwritten notes naming the same "sponsor" in distant states, sourced from cartel handlers they could not identify. This speeds releases but masks trafficking endpoints.

2. Identity Laundering and Infiltrated Processes

- Cartels routinely alter documents (names, ages, origins) to pose adults as family or hide criminal ties, corrupting U.S. records and enabling "laundering" of identities.
- They infiltrate NGOs, turning aid into smuggling routes. Preselected sponsor info exploits rules prioritizing quick placements over scrutiny.

3. Inadequate Vetting and Dangerous Releases

- Background checks, home studies, and household visits are routinely waived or rushed. Sponsors often prove to be fronts for exploitation, for example, empty lots, illicit businesses like strip clubs, or fast-food sites listed as "homes."
- Legislative Gap: The Kayla Hamilton Act (H.R. 125, introduced by Rep. Russell Fry) exposes this by mandating checks on both sponsors and UACs, revealing ties to foreign crimes or cartels that current protocols ignore.

4. Facility and Operational Breakdowns

- Endeavors (Pecos, TX): Unvetted staff accessed dorms; explicit "dance routines" targeted girls; excessive vaccinations caused collapses; early releases dodged ICE scrutiny. Whistleblowers fired for flagging sponsor concerns.
- Cherokee Federal (Pomona Fairplex, CA): Sex offender accessed kids due to background check delays; hundreds of children miscounted, missing records, moldy food, drugs found on site (ex. a 5-year-old with a vape); abortions for teenage girls without guardian consent.

5. Transportation and Post Placement Risks

- Minors shipped nationwide via chartered flights, commercial airlines, and buses with little oversight. Many traveled alone, to wrong destinations, or without sponsors, prompting CPS interventions.
- Example1: Association for the Recovery of Children documented multiple ORR violations while observing a charter flight of migrant children arrive in Tennessee.
- Example 2: Former MVM site supervisor reported staff raising concerns about children crying and not knowing who their sponsors were. Upper management reportedly said, "We're going to have to start flying some of these kids overseas. There aren't enough sponsors, and we need to get them out of here."

6. Post Placement Breakdowns

- Most follow-ups relied on unanswered phone calls, allowing cases to be closed prematurely. Over 300,000 UACs remain unaccounted for. Data was not shared with state agencies to permit state conducted welfare checks.
- Example: Our field research documented 117 UACs trafficked to a Midwest farm where children presented with STDs and a thirteen-year-old arrived pregnant. Our intervention triggered an active criminal investigation.

Question 2: Why Children Were Told to Request Specific Sponsors

Based on our research and direct experience in these cases, many children were deliberately coached by cartel operatives or their intermediaries to request specific, preselected sponsors, often individuals or fronts with established ties to trafficking networks, to ensure seamless handoff and continued exploitation after release from government custody. This coaching occurred during transit, with handlers providing scripted details, including sponsor names, addresses, and even fabricated familial relationships, to exploit the systems emphasis on rapid placement over rigorous verification.

To your specific example: Yes, I firmly believe UACs were purposely directed to request sponsors who evaded or minimized background checks, allowing numerous direct placements into the hands of human traffickers or cartels. The sponsor vetting process under the current framework relies heavily on self-reported information submitted via insecure channels, such as WhatsApp messages containing scanned IDs, without mandatory biometric verification, facial recognition, or in person confirmation. This creates a vulnerability that traffickers exploit by selecting "sponsors" who appear low risk on paper but are unvetted in practice, individuals without prior U.S. records, using stolen identities, or posing as distant relatives.

Indicators of this widespread fraud are stark: Though no comprehensive count exists due to inadequate tracking, HHS audits and internal reviews have revealed that nearly 70 percent of sponsor applications contained fraudulent information, including falsified documents and mismatched identities. Post release monitoring, which often consists of little more than unanswered phone calls, compounds the issue, repeatedly failing to detect when children are rerouted to exploitation sites. At its core, the unreliability of the systems data, where unverified IDs flood a compromised database, enables this pipeline, turning releases into predetermined trafficking endpoints. Strengthening mandatory DNA testing, biometric sponsor matching, and comprehensive home studies is critical to dismantling this tactic.

Systemic Issues Across All Steps

1. **NGO Mismanagement**: Unvetted staff, silenced whistleblowers, and blocked oversight.

- Cartel Exploitation: Embedded themselves in sponsor pipelines and NGO processes.
- 3. **Federal Oversight Gaps**: ORR and DHS contractor layers eroded accountability.
- 4. **Financial Misuse**: \$20B+ in federal funding rewarded output (speed) over outcomes (safety).

Recommendations

- Sponsor vetting: Mandate in-person home studies, ID/income/relationship verification; integrate DNA/biometrics; flag multi-child/repeat-address links.
- Post placement monitoring: require 6–12 months of in-person monitoring; share data with state welfare agencies.
- Policy shift: Pass/enforce Kayla Hamilton Act; prioritize "safe release" over "fast release".

Conclusion

Our research confirms children were deliberately coached to request cartel-linked sponsors, securing traffickers' control over minors even after federal release. Weak identity verification, NGO mismanagement, and obstructed oversight have forged a system prioritizing speed over safety, funneling children into national-scale trafficking pipelines. Only by enforcing accountability and child-first safeguards—replacing profit with protection—can we dismantle this taxpayer-funded pipeline and reclaim border integrity.

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^{*}More extensive recommendations included as an addendum.

ADDENDUM: UAC PROGRAM POLICY RECOMMENDATIONS

- Conduct Forensic Audits of Major Contracts: Require independent audits of all ORR and ICE/DHS contracts starting with contracts over \$100 million. Auditors should follow the money - examining spending for unused facilities, executive compensation from grant funds, and contract compliance. Wasteful or abusive contracts must be suspended, terminated, and unspent funds clawed back.
- 2. Strengthen Vetting and Oversight: Rebuild the sponsor vetting process from the ground up. This means re-imposing rigorous background checks (including fingerprinting and criminal/abuse registry checks for all adults in a household) before a child is released. Require proof of identity, income, and relationship for sponsors, and flag cases with multiple sponsor applications or addresses receiving numerous children. Home studies (in-person home visits) by social workers should be mandated for all high-risk placements (ideally for all placements of UACs), both before release and as follow-up. ORR should not hesitate to deny or delay release if a sponsor raises any concern. The goal must shift from "fast release" to "safe release." Congress is already considering legislation to this effect (such as H.R. 5018, the Stop Human Trafficking of Minors Act, which would tighten sponsor requirements). These reforms need to be enacted and enforced.
- 3. Expand Post-Release Monitoring: Children must not disappear after leaving government custody. ORR should partner with state agencies and NGOs to conduct in-person check-ins for 6–12 months. Missed court dates, school absences, or unanswered calls should trigger welfare investigations. A national database must track outcomes, with regular public reports to hold agencies accountable.
- 4. Create Independent Oversight and Accountability: Establish a federal oversight body (either within GAO or as a dedicated Inspector General task force) that has the authority to audit contractors, conduct unannounced inspections, investigate whistleblower reports, and refer cases for prosecution. Establishing this accountability is critical to changing the current culture of impunity.
- 5. Close Loopholes and End "Shadow" Programs: Prohibit extralegal custody arrangements like hoteling. Every minor must be housed in licensed facilities with vetted staff, legal counsel, and child advocates. Emergency shelters must meet the same standards as ORR shelters. Contracts should be performance-based, tied to child safety, not headcounts.
- Strengthen Collaboration with Law Enforcement: The immigration and law enforcement agencies must work together to identify and dismantle trafficking rings that target UACs. This includes data-sharing: HHS/ORR should provide

DHS and DOJ with information on suspicious sponsor patterns (e.g. one person sponsoring multiple unrelated kids, or many kids going to the same factory or address). DHS in turn should ensure any intelligence about cartel involvement is relayed to HHS. Task forces can be formed in hotspot areas to proactively check on clusters of UAC placements for signs of labor exploitation. Recent large-scale raids (like the California farm case) show the effectiveness of joint action when agencies coordinate.