

PROSTITUTION AS TERRORISM:

**FUSION CENTERS AND THE WAR ON
SEX WORK**

**EROTIC SERVICE PROVIDERS LEGAL
EDUCATION AND RESEARCH
PROJECT**

Acknowledgements

Distributed Denial of Secrets (DDoS), for all their hard work making the leaked documents that inspired this project (and so much more) available. Learn more and support their work at DDoSecrets.com

SWOP Behind Bars, for their tweets that sent us down this path. Learn more and support their work at swopbehindbars.org

Calyx Institute, for funding this investigation – one that required the slow (one might say reluctant) and unpredictable cooperation of the fusion centers whose public records we were investigating. Learn more and support their work at calyxinstitute.org

Urgent Action Fund, for stepping up with rapid response funds when a massive and costly public records release was imminent. Learn more and support their work at urgentactionfund.org

Our comrades at COYOTE RI, who donated the cost of the Rhode Island documents. Learn more and support their work at coyoteri.org

About Us

The Erotic Service Provider Legal Education and Research Project

This report was produced by ESPLER Project, Inc. (ESPLER), a California-based advocacy nonprofit. The main issue addressed by ESPLER is decriminalization of sex work. To achieve this end, ESPLER's day-to-day work advances worker rights, consumer privacy rights, and sexual privacy rights. We educate erotic service providers, policy makers, and the public through coordinated outreach, research, and legal advocacy.

In 2017, ESPLER brought *ESPLERP v Gascón* [16-15927], a constitutional challenge to California's anti-solicitation for prostitution law known as Penal Code 647(b) PC to the U.S. Court of Appeals for the Ninth Circuit. The Gascón case argued that criminalizing sex work violates consumers and the sellers right to sexual privacy, based on the groundbreaking 2003 *Lawrence v. Texas* case, which acknowledged the right to sexual privacy for sexual relations between people of the same sex, thereby decriminalizing homosexuality.

Learn more at esplerp.org



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Executive Summary

This project utilized **BlueLeaks fusion center documents** provided by Distributed Denial of Secrets and requested **fusion centre records from ten different states** across the nation (AZ, CA, CO, GA, LA, ND, NM, RI, TX, and two in FL). Because of differences in state laws regarding public records, as well as uneven compliance with laws and public records requests, each request resulted in different results and different types of documents. The law enforcement operation records and trainings in these documents demonstrate an intentional, inaccurate **renaming of sex work as sex trafficking and terrorism**. Agencies deliberately shift rhetoric over time, gradually eroding legal definitions of sex work and sex trafficking in the last two decades.

Increasingly, in recent years, government agencies have portrayed prostitution as a threat to national security and as terrorism. Fusion centers (and other law enforcement entities created to respond to terrorism and threats to national security) play a foundational role in the **expanded surveillance of criminalized and marginalized communities** and in this rhetorical and institutional shift.

Various forms of **legal and online sex work** – not just criminalized sex work – have been included in these incorrect confluences of sex work, sex trafficking, and terrorism.

This **intentional use of doublethink** creates an ideological space where injustices like warrantless governmental surveillance, sexual assault by law enforcement officers, and criminal charges against sex trafficking victims go unchallenged.

The deliberate false portrayal of prostitution as a threat to national security creates **harm on multiple levels**: it manufactures a moral panic, endangers sex workers and sex trafficking survivors, misuses federal dollars in a fight against false constructs, redirects local police resources from addressing violent crime into prostitution sting operations, and sets the stage for broad violation of citizens' privacy rights and body autonomy.

This report includes **ten policy recommendations** based on these findings, expanded on in the final section:

1. Establish clear guidelines and time limits for responding to public records requests.
2. Establish financial penalties paid to the requester for daily noncompliance.
3. Establish task forces to provide oversight of law enforcement agencies that perform prostitution and human trafficking operations, arrests, incarcerations, and convictions.
4. Prohibit sexual contact by federal, state, county, and city or municipal law enforcement personnel in prostitution sting operations by making it a federal crime.
5. Enact legislation to expand privacy laws.
6. Establish accountability and integrity laws to prevent the breakdown of intellectual rigor in policing criminalized populations.
7. Remove prostitution from the federal moral turpitude statues that are so vague as to be arbitrarily used to bar legally working sex workers (like cam workers) from entering the United States.
8. Remove prostitution as a means to deport people.
9. Overhaul prostitution and sex trafficking training for law enforcement to ensure that policing practices respect all aspects of consensual adult sex work.
10. Decriminalize prostitution to prevent the surveillance, public stigmatization of, and discrimination against sex workers and our clients.

Introduction

How It Started

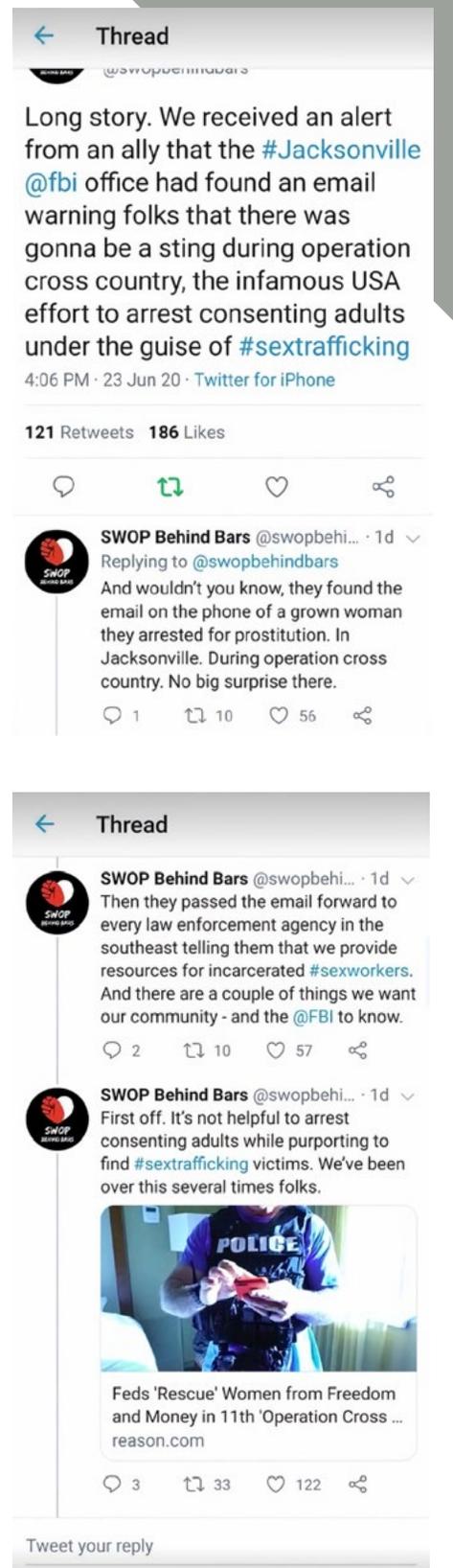
In 2022, the Erotic Servers Providers Legal, Education, and Research Project (ESPLER) team became curious about watch lists or databases that sex workers and sex trafficking survivors were put on. At the time, we were writing a report called *How The War On Sex Work Is Stripping Your Privacy Rights*¹, in which we looked at surveillance technologies used by police to target sex workers in California. We learned about two sex worker specific databases that California police agencies subscribe to – TrafficJam by Marinus Technologies and Spotlight by Thorne – which scrape sex work advertising websites, social media, and other websites, around the clock, to build out and maintain data on individual sex work advertisers. We also learned about databases like Clear, Accurint, CopLink X, and more, which are similarly used for warrantless surveillance and to maintain information about **all** citizens.

In talking to members of our community, we learned that some police departments keep their own “binders full of sex workers.” Our colleagues described being photographed nude and questioned by police under threat of arrest in order for police to create records of sex workers. We started to wonder if any federal agencies kept similar lists.

As our curiosity led us down new paths, we learned about the National Gang Intelligence Center², which is said to maintain a list or database of known gang members. A gang is defined as “three or more people organized for the purpose of engaging in criminal activity”. Could sex workers rights groups who are organizing to advocate for consensual, private, adult sex on our own terms (which we believe is constitutionally protected) be considered gangs? Are sex worker activists categorized as known gang members? We still don’t know.

Next, we learned about the National Suspicious Reporting Initiative³, which was established after it was identified that poor inter-agency communication in the law enforcement sector was a factor contributing to the tragic events of 9/11. Specifically, law enforcement agencies failing to communicate with each other

1 (2023). *How The War On Sex Work is Stripping Your Privacy Rights*. Erotic Service Provider Legal, Educational, and Research Project. <https://esplerp.org/wp-content/uploads/2025/04/Consumer-Privacy-How-The-War-On-Sex-Work-Is-Stripping-Your-Privacy-Rights.pdf>
2 (n.d.). *National Gang Intelligence Center*. Wikipedia. https://en.wikipedia.org/wiki/National_Gang_Intelligence_Center
3 (n.d.). *National Suspicious Activity Reporting Initiative*. Wikipedia. https://en.wikipedia.org/wiki/Nationwide_Suspicious_Activity_Reporting_Initiative



about people engaged in non-criminal behavior resulted in agencies overlooking pre-operational movements taking place ahead of the terrorist attacks. To prevent such oversights in the future, fusion centers⁴ were set up in each U.S. state to receive and share Suspicious Activity Reports submitted by personnel trained for this purpose at banks, airports, universities, and more.

Reading about “suspicious reporting”, we recalled SWOP Behind Bars’ 2020 tweets describing an email about SWOP BB’s advocacy work that the Jacksonville FBI had sent to law enforcement agencies across Florida. Could that have been a fusion center email? A suspicious activity report? Was the Jacksonville FBI categorizing advocacy for incarcerated sex workers as terrorism?

BlueLeaks

In June 2020, Distributed Denial of Secrets (DDoS)⁵, a U.S. 501(c)(3) non-profit that archives and publishes hacked and leaked public interest data, released 269 gigabytes of hacked fusion center data. BlueLeaks⁶ (#BlueLeaks) was the largest release of police data in U.S. history. The data showed that fusion centers were tracking Black Lives Matter protesters and, in Maine⁷, were providing information about protesters and activists to corporations like ExxonMobile.

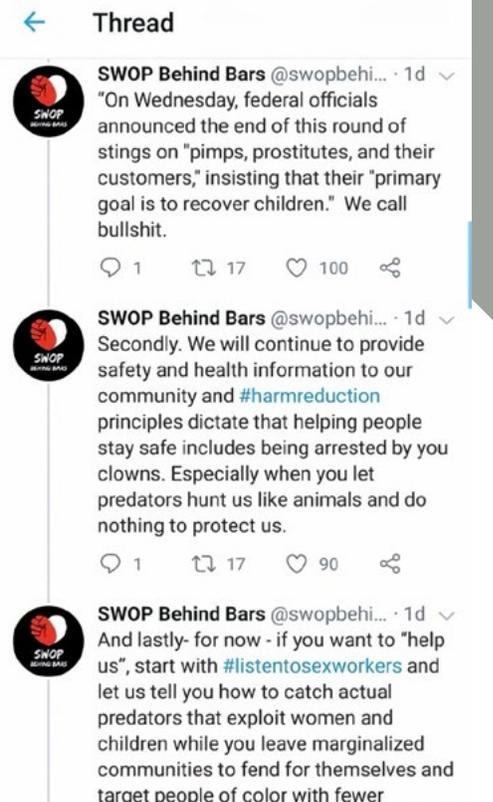
We searched the BlueLeaks files to see if that email about SWOP Behind Bars had come from a fusion center, and there it was:

4 (n.d.). *Fusion Center*. Wikipedia. https://en.wikipedia.org/wiki/Fusion_center

5 (n.d.). Distributed Denial of Secrets. <https://ddosecrets.com/>

6 (n.d.). *BlueLeaks*. Distributed Denial of Secrets. <https://ddosecrets.com/article/blueleaks>

7 (2020, July 16). *Maine’s police intelligence center sent reports on activists to corporations*. Maine Beacon. Retrieved March 23, 2025, from <https://mainebeacon.com/maines-police-intelligence-center-sent-reports-on-activists-to-corporations/>



Tweet your reply



**SITUATIONAL INFORMATION REPORT
FEDERAL BUREAU OF INVESTIGATION**

Potential Activity Alert

JACKSONVILLE DIVISION

Approved for Release: 19 July 2019

SIR Number: SIR-00327848317

(U//FOUO) Listserv Email Containing Screening Tips and Warning about Operation Cross Country for Sex Workers, as of July 2019

SOURCE A: (U) A detainee.

SOURCE B: (U) An FBI Agent.

(U//FOUO) While conducting a sex trafficking operation on 8-9 July 2019, FBI Jacksonville identified an email from "SWOP Behind Bars," specifically swopbehindbars@gmail.com, on the phone of an adult female who was arrested for prostitution. The subject of the email was "Health and Safety in North Florida" and the email contained various tips for sex workers and mentioned Operation Cross Country.

(U) FBI comment. According to swopbehindbars.org, SWOP Behind Bars is a chapter of the Sex Workers Outreach Project which "provides community support for incarcerated sex workers." SWOP provides monthly newsletters, books, study materials, and sex worker pen pals for incarcerated sex workers.

(U//FOUO) The email sent from SWOP Behind Bars stated, "We were just notified that Operation Cross Country will be happening on the third week of July. Operation Cross Country is an annual sting operation by the FBI to find trafficking victims but they arrest all escorts and the clients of escorts. There is a rumor that Jacksonville may be one of the locations. Jacksonville has been used the last 2 years. Cops may be set up in Vacation Rentals or Airbnbs in addition to hotels. We will send more information as it becomes available. In the

(U) Warning: This is an information report, not finally evaluated intelligence. It is being shared for informational purposes but has not been fully evaluated, integrated with other information, interpreted or analyzed. Receiving agencies are requested not to take action based on this raw reporting without prior coordination with the FBI.

(U) Note: This product reflects the views of the JACKSONVILLE Division.

The FBI's Situational Information Report left us with more questions than answers. We asked ourselves, does the FBI really think that providing sex workers with information about staying safe is a form of terrorism? If that is true, what does that mean for sex workers, sex trafficking survivors, and all of us living in the so-called land of the free?

UNCLASSIFIED//FOUO

mean time, we have put together some screening tips that you may or may not need as well as a safety planning worksheet just in case you find yourself trapped in a sting."

(U) The suggested screening tips included, but were not limited to:

- (U//FOUO) "Get as much information as you can about the person including:
 - (U//FOUO) A. Full Name: Google them, try and find their facebook, LinkedIn, social media account - the more of a footprint they have online, the more likely it's a real person.
 - (U//FOUO) B. Phone Number
 - (U//FOUO) C. Place of employment
 - (U//FOUO) D. Online Profile"
- (U//FOUO) "ALSO DO A REVERSE PHONE NUMBER AND ADDRESS CHECK - to see if the name and address and phone number all match up. You can check the property owner of record by going to your counties property appraiser website and searching the address. Any number of websites provide inexpensive solutions to back ground checks like truthfinder, spokeo, background check and people finder."
- (U//FOUO) "Ask for references of previous dates your potential connection has had. Follow up with those people to ask whatever information helps you to feel safe."
- (U//FOUO) "If you have a local bad date list, read it before heading out! Even if you don't remember everything, something might make you double check before you head out with someone."
- (U//FOUO) "Run against traffic not with it."
- (U//FOUO) "The smaller the stroll, the more you have to guard your reputation. In a small town with a small pool of customers, you can't afford to get caught stealing, faking, going with someone for less-than-price or without condoms."

(U) FBI comment. When a user visits swopbehindbars.org, a Sign Up Form populates which asks the user to provide their Department of Corrections number, incarcerating institution, release date, and Amazon wish list, in addition to basic identifiers.

(U) This report has been prepared by the JACKSONVILLE Division of the FBI. Comments and queries may be addressed to the JACKSONVILLE Division at 904-248-7000.

In searching for answers to these questions, we pored through the BlueLeaks documents, submitted records requests to fusion centers, and dug deep into Homeland Security and other federal rhetoric to see what they said officially about sex work, sex trafficking, and terrorism or national security.

Records Requests

The BlueLeaks data included documents like the Situational Information Report about SWOP Behind Bars as well as several reports from the FBI that were not classified as secret – but also would not be released to us under most states’ public records laws. Access to this cache of documents turned out to be critical to the investigation thanks to unpredictable and idiosyncratic state public records laws: although they are federally funded and coordinated, because ownership of fusion centers lies with individual states, their records are subject to the records request laws of each state. Our goal was and is to hold fusion centers accountable in states where sex work activism is prevalent (i.e., to get a good pool of documents). Thanks to major differences in state records request laws, our requests produced a wide variety and number of documents from fusion center requests to 10 state fusion centers. We submitted requests for the following public records:

All threat assessments, field reports, intelligence updates, emails, and email attachments, which mention the following terms or names:

- Prostitute*
- Escort*
- “Sex Work” or “Sex Worker”*
- “Sex trafficking” or “Sex Trafficker”*
- “Sex Buyer”*
- “Commercial Sex”*
- “Sex Trade” or “Sex Industry”*

This request has a date range of 1/1/2021 until the date this request is processed.

The investigation had its moments of dark comedy. For example, after we submitted a records request to the Fusion Center in Texas, the Texas Department of Public Safety sought a decision from the Texas Attorney General that the records were “exempt from

request” – period, end of story. Their argument was based on the Texas Homeland Security Act, which says that information is confidential if it pertains to an act of terrorism or related criminal activity. Although our lawyer tried to get them to explain how sex work was terrorism (see letter below), the Texas Attorney General granted the exemption with no explanation.⁸

The number of times that we (and others seeking public records) have been told that the information we want is terrorism related – so we can’t have it – is a lot. It’s a little too convenient how so many law enforcement public records are classified as “terrorism.”

The lack of accountability and dismantling of our government’s standard mechanisms for accountability around things classified as terrorism provides incentive for government agencies to call for more and more things to be classified as terrorism.



As documents began to arrive, connecting the dots felt a little like this!

⁸ All of the correspondence with the Texas Department of Public Safety and Texas Attorney General is available at this link: <https://drive.google.com/drive/folders/1mBysFCMsWmlFmssr0MFSH3sr8pY0GECa?usp=sharing>

August 2, 2023

Asst. General Counsel Christina M. Lee
Texas Department of Public Safety
5805 N Lamar Blvd - Box 4087
Austin, TX 78773-0001
MediaAndCommunicationsOffice@dps.texas.gov

VIA E-Mail Only

Attorney General of Texas
Open Records Division
PO Box 12548
Austin, Texas 78711-2548

VIA E-Mail USPS

**RE: Public Information Request for any and all records
threat assessments, field reports, intelligence updates,
emails, and email attachments that mention sex work,
sex trafficking or sex trade between January 1, 2021 to
May 30, 2023 (PIR 23- 1607)**

Dear Public Officials:

I have the distinct privilege of representing Tara Burns, who made a May 26, 2023 request to the Texas Department of Public Safety under the Texas Public Information Act for “all threat assessments, field reports, intelligence updates, emails, and email attachments, between 1/1/2021 and the date the request is processed which mention the following terms or names, Prostitute, Escort, “Sex Work” or “Sex Worker,” “Sex trafficking” or “Sex Trafficker,” “Sex Buyer,” “Commercial Sex,” “Sex Trade,” or “Sex Industry.” She did not make any request for any information about terrorists or terrorism.

On June 13, 2023, Assistant General Counsel Christina M. Lee responded on behalf of the Department of Public Safety indicating the Department was referring the matter to the Attorney General’s



Public Records Request
August 2, 2023
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Office for a ruling regarding the release of the records. My client has not received any further communications.

We believe that none of the reasons for the Department's denial of the public records request are legally sound and reserve all rights to challenge those denials. However, there is one basis that is particularly confusing to my client and so I write specifically to inquire about that basis for denial.

Ms. Lee argues that the responsive material should be withheld under Texas Government Code § 552.101 because it might be deemed confidential under the Texas Homeland Security Act, § 418.177. Unless the Department is relying on absurdly broad definitions of "terrorism" or "related criminal activity" I simply cannot fathom how prostitution or even human trafficking would be ordinarily related to terrorism.

Please respond to this letter and explain why records about prostitution and human trafficking would be exempt under the Homeland Security Act. Specifically, I would like to know if the exemption relates to particular investigations where individuals were involved in both human trafficking and terrorism, or if it is the Department's position that human trafficking and prostitution are extrinsically linked to terrorism and thus the Department will withhold all records concerning prostitution and human trafficking or the investigation thereof.

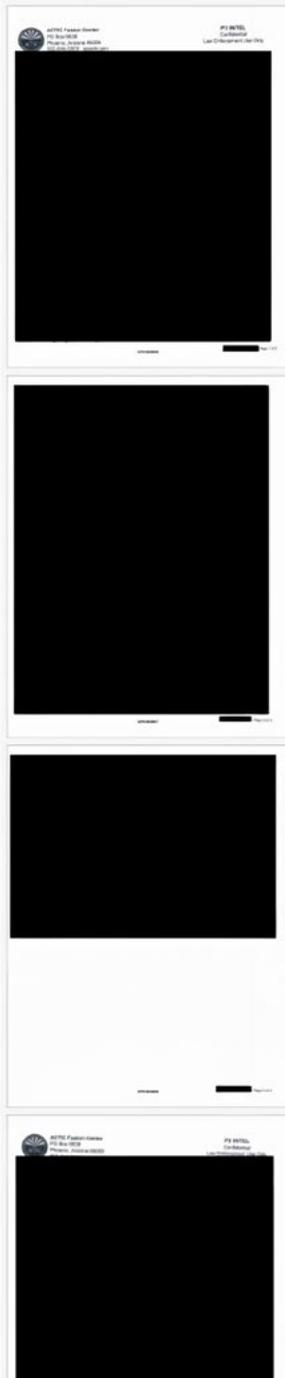
I thank you in advance for your further explanation.

Very truly yours,

D. GILL SPERLEIN



Wait times were long, but some fusion center requests were otherwise hassle-free. In January of 2024, in response to our May 2023 request to the Miami Dade Fusion Center, we received an invoice from the Miami Dade Police Department for \$83,948.50.⁹ We narrowed our request and paid \$1,703.50 later that January. A full year later, in late January 2025, we received 168 documents, almost all of which were police reports from the Miami Dade Police Department having to do with prostitution and/or sex trafficking. Sadly we may never know what records we could have had for \$83,948.50.



Some fusion center requests were met with epic levels of foot-dragging. We submitted our request to the [Arizona Fusion Center](#) in May 2023; in October 2023, they requested an unexpectedly small payment of \$9 to fulfill the request – which we sent. In December, the \$9 was returned. In response to our repeated follow ups, we received many emails that simply said, “The records are pending redaction. The Public Records Unit will let you know when the records are ready for invoice and release.”

In January 2025, we were assured that two of the Arizona Department of Public Safety’s most experienced redactors were working diligently on our request. In March we were offered a rolling release of records and received the first installment, totalling 5,878 pages, on March 19, 2025 as we were putting the finishing touches on this report. About 5,200 of these pages were completely redacted, as seen in the screenshot to the left. Of the unredacted pages, 322 pages consisted of two copies of the Interpol review of digital evidence for 2019-2022. Also included were 67 (although many were duplicates and triplicates) human trafficking hotline reports from the Polaris Project.

Interestingly, while the Arizona Department of Public Safety chose to redact all but the cover page of two copies of the Trafficking In Persons June 2023 Report,¹⁰ a public document published by the Department of State, Arizona’s Department of Public Safety’s most experienced redactors did not choose to redact several reporting witnesses and sex trafficking victim’s names and phone numbers from human trafficking reports.

Many of our fusion center records requests have been similarly fruitless. The Louisiana State Information and Fusion Exchange most recently responded to our May 2023 request in July 2024. They asked that we narrow our search. We did so, but the Exchange has not responded to our narrowed request, nor to three follow-up messages.

The New Mexico Department of Homeland Security and Emergency Management said that they did not have any records such as those we requested. Obviously they did have those records but some aspect of their state public records law allows them to say that unreleasable records don’t exist.

For a total records fee of \$1,358.25, which was generously underwritten by our longtime colleagues at COYOTE RI, the Rhode Island State Fusion Center provided thousands of pages of documents, many of which were reports on missing children.

9 https://drive.google.com/file/d/1ttDCVB3mFknUMH9bDZq73ACWQPOc-Adl/view?usp=drive_link

10 US Department of State, Trafficking in Persons June 2023 <https://www.state.gov/wp-content/uploads/2023/06/Trafficking-in-Persons-Report-2023.pdf>

In March 2023, we submitted a records request to the Florida Fusion Center for documents containing the words “SWOP Behind Bars,” “Sex Workers Outreach Project,” or “Alex Andrews”, to see if Florida would deliver the document that we found in the BlueLeaks data. They responded five months later confirming receipt of our request. Since then, for the remainder of the two-year waiting period, they sent automated responses to our regular follow ups saying “*you should receive a response to your inquiry as soon as possible*”. The wait continues.

The Georgia Information Sharing Analysis Center’s response was quick. We heard back from our May 2023 request in June with information about fees for the records. In July, they reversed their position, saying that records related to fusion centers are not releasable per Georgia State law. Two weeks later, they wrote for a third time, saying they had performed a search and found no records respondent to our request. We imagined that our request had sent the office into an uproar – perhaps it was an intern who so innocently gave us the impression that the Center would comply with our FOIA request – the offending email then ascending the ranks of management until the final boss put the kibosh on the whole caper.

The Colorado Information Analysis Center responded promptly to our May 2023 request in June, saying that our request was too broad and requesting a phone call to narrow it. Lead researcher Tara Burns spoke with their representative, Miki Trost, on June 15; Trost agreed to provide the records – but nearly two years later, still has not provided them.

An agreement to provide records sometimes resulted in the delivery of records – technically speaking – just perhaps with a touch of under-delivery. We requested records from the North Dakota State & Local Intelligence Center in March 2023. They responded promptly, saying they had located 76 records respondent to our request and asking for payment of \$625. After reviewing and redacting the 76 records, they provided us with an underwhelming seven documents.

Sex Work, Prostitution, and Sex Trafficking

Sex work refers to the sale of sexual services. Escorts, street based sex workers, sugar babies, adult performers, phone sex operators, and fetish providers may all refer to themselves as sex workers. Prostitution is a specific type of in-person intimate service defined by criminal law in each state. People who engage in prostitution may call themselves prostitutes, especially to locate themselves in relation to laws they are discussing, or they may use any number of other terms that don’t relate to the way the state defines us – provider, escort, shady lady, working girl, companion, etc. Publicly, most of us prefer to use the umbrella term sex worker. Here, we generally use the term sex worker, but also use prostitute in relation to criminal law.

Because prostitution and other kinds of sex work are regulated through criminal laws and the criminal justice system, working conditions in the sex industry are created by law makers, police, and prosecutors – in other words, from a labor organizing perspective, these representatives of the government are our bosses. When sex workers organize to negotiate for our labor and safe work conditions, these are the “bosses” we go to.

State sex trafficking laws are one example. Many states have laws against sex trafficking (or pandering or promoting prostitution) that redefine common steps sex workers take to maintain their personal safety, including indoor prostitution (having a “place of prostitution”), providing a reference for a client, doing duos, and other common practices, as felonies. When sex workers can’t work indoors, check client references, or work together, we are at greater risk of violence, including sex trafficking and murder. To change these laws so that we can engage in safety practices without risking long prison sentences, we go to the bosses: legislators.

According to federal definitions outlined in 18 U.S.C. § 1591, sex trafficking is the use of force,

Sex Work, Prostitution, and Sex Trafficking ... cont

fraud, coercion, or a minor in a commercial sex act. When minors - or imaginary minors - are involved, the “trafficker” can be a client or simply a person who agrees to meet an imaginary minor that police are pimping out online. The term commercial sex act is defined broadly as “any sex act, on account of which anything of value is given to or received by any person.” Some researchers and non-governmental organizations studying the sex trafficking of minors have interpreted this so broadly as to include a 17 year old who went out dancing with their same aged dating partner and received a gift of flowers. Non-governmental organizations serving adult sex trafficking survivors have applied definitions that include all sex workers or anyone who engages in a “commercial sex act,” including women who have non-monetized sex with people they receive drugs from or who barter sex in the context of a committed relationship. The statistics agencies create using these misleading definitions, often under federal funding from the Office for Victims of Crimes, are used to justify the War on Sex Work and to increase funding to these non-governmental organizations.

The Records

Because every state has different laws about what records may be released to the public, we received different types of records from each state. None of the states provided the FBI Situational Alerts and Emerging Intelligence Reports (all marked “unclassified”) that were included in the BlueLeaks documents. Many documents were invitations to training about human trafficking, sales emails, or updates from services like TrafficJam. Rhode Island sent hundreds of National Center for Missing and Exploited Children missing child reports; the form has the words sex trafficking on it, so each report met our request parameters. No other fusion center sent these reports. The Miami Fusion Center, which is hosted at the Miami Police Department, sent over 150 police reports. No other fusion center sent more than a dozen police reports.

In between all the marketing emails, missing children reports, training notifications, and often hilariously passive aggressive emails between police officers, there were suspicious activity reports about sex workers using banks. There were reports about surveilled sex workers, sex trafficking survivors, and pimps. There were FBI emerging intelligence reports about OnlyFans and about the “threat of online commercial sex.”



1 Homeland Security Spends Your Tax Dollars on Policing Prostitution

A Quick Look At Homeland Security’s Defense of the Homeland From Prostitution

Many training and informational documents we collected for this study were produced or referenced by the Department of Homeland Security (DHS) – a federal agency less than three decades old founded to safeguard the nation from terrorism. In recent years, independent adult sex workers have been approached or detained by Homeland Security agents in seeming prostitution sting operations. This is confusing, because logic would tell us that the Department of Homeland Security is supposed to be protecting us from terrorists, not terrorizing prostitutes who are only accused of committing state level misdemeanors.

Over the decades, the Department of Homeland Security’s mission creep expanded the department’s scope into six overarching missions that make up its strategic plan: counter terrorism and homeland security threats, secure US borders and approaches, secure cyberspace and critical infrastructure, preserve and uphold the nation’s prosperity and economic security, strengthen preparedness and resilience, and champion the DHS workforce and strengthen the department.¹¹ What does any of that have to do with sex workers? Their website asserts that “Human trafficking threatens our physical and virtual borders, our immigration and customs systems, our prosperity, our national security, our personal and public safety.”¹² “Threatens” is an odd choice of word in this sentence.

In an award winning report titled “Homeland Secrets: Operation Agent Touch” the Howard Center for Investigative Journalism looked into a case where Homeland Security Investigations (part of ICE) claimed to have rescued Asian massage parlor workers who were being held in sexual servitude in Arizona using a “victim centered” approach. What they actually found was shocking:

Over a nearly five-month period, the HSI undercover agents documented in graphic detail 17 sexual encounters with women working in eight massage parlors. Ultimately, two women were designated as victims, but their whereabouts are unknown. Two other women who were charged with prostitution were initially put in ICE detention, although only one still faces deportation hearings... Local HSI supervisory agents signed at least eight internal reports that documented sex acts during undercover visits to the massage parlors, HSI records show. HSI unit chiefs in Washington, D.C., typically receive daily briefings to monitor undercover activity, Garcia said. At least one Mohave County judge approved a search warrant whose probable cause affidavit listed the agents’ undercover sexual activity. And a prosecutor aware of the agents’ methods took the case to a grand jury. None of the undercover agents was disciplined.¹³

11 Homeland Security Investigations (2023, February 26). Mission. Retrieved February 4, 2025, from <https://www.dhs.gov/mission>

12 Homeland Security Investigations (2022, November 3). Human Trafficking. Retrieved February 4, 2025, from <https://www.dhs.gov/topics/human-trafficking>

13 (2020, May 11). *Operation Agent Touch*. Cronkite News. Retrieved February 6, 2025, from <https://cronkitenews.azpbs.org/homeland-secrets/agenttouch/story/index.html>

There were no sex trafficking charges filed, and ultimately, all of the pending criminal charges for prostitution and related crimes were dropped because Homeland Security Investigation agents would not appear and testify in court about their investigation, which included sexual contact with those they claimed to rescue via arrest. What does this have to do with terrorism or national security? What threats to our borders were averted? Was public safety somehow improved by HSI agents getting handjobs and arresting women for prostitution?

A quick Google search turns up dozens of articles about Homeland Security “sex trafficking” operations that target consenting adults engaged in prostitution.¹⁴

U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement

Search

Call [1-866-DHS-2-ICE](tel:1-866-DHS-2-ICE) to report suspicious activity [Report Crime](#)

About Us Immigration Enforcement Combating Transnational Crime Newsroom

ICE NEWSROOM

SEPTEMBER 20, 2023 • DALLAS, TX • HUMAN SMUGGLING/TRAFFICKING

HSI Dallas-led operation results in 134 arrests for commercial sex transactions

DALLAS — On Sept. 20, the Homeland Security Investigations (HSI) Dallas-led North Texas Trafficking Task Force announced the arrests of 134 individuals for the purchase of sex, a felony violation in Texas.

The five-day, multiagency operation ran from Sept. 11 through Sept. 15. It included partners from 15 federal, state and local law enforcement agencies across four cities in the Dallas-Fort Worth metroplex to address the growing demand for human trafficking and commercial sex in the area.

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Homeland Security Investigations, which is part of Immigration and Customs Enforcement (ICE), often leads or participates in federally funded regional sex trafficking task forces that target Asian massage parlors around the country. These stings are publicized by HSI and other law enforcement agencies as successful attempts to rescue sex trafficking victims, but in most cases no trafficking charges are filed,¹⁵ and the “victims” who were allegedly rescued are charged with prostitution or unlicensed massage¹⁶ and may face deportation proceedings.¹⁷

- 14 Homeland Security Investigations (2021, August 12). *HSI Phoenix assists in multi-agency operation, 18 men arrested on prostitution and other charges*. US Immigrations and Customs Enforcement. Retrieved February 4, 2025, from <https://www.ice.gov/news/releases/hsi-phoenix-assists-multi-agency-operation-18-men-arrested-prostitution-and-other-charges>
- 15 Braun, M. (2019, July 30). *Two years after Florida’s massage parlor crackdown, no one has faced sex trafficking charges. Why?* News-Press. Retrieved February 4, 2025, from <https://www.news-press.com/story/news/crime/2019/07/30/operation-spa-two-years-later-crackdown-has-no-trafficking-charges/3232461002/>
- 16 (2022). *Un-Licensed: Asian Migrant Massage Licensure and the Racialized Policing of Poverty*. Red Canary Song, Massage Parlor Outreach Project, Butterfly, in Collaboration With Bowen Public Affairs & Brown University Center for the Study of Slavery and Justice Human Trafficking Research Cluster. https://static1.squarespace.com/static/5e4835857fcd934d19bd9673/t/6218d9316e93a74b051c9f00/1645795656006/2022_Un-Licensed.pdf
- 17 Shih, E. (2021). The Trafficking Deportation Pipeline: Asian Body Work and the Auxiliary Policing of Racialized Poverty. *Feminist Formations* 33(1), 56-73. <https://dx.doi.org/10.1353/ff.2021.0003>.

The presentation of Asian massage parlors as threats to national security has led to violence against Asian workers.^{18 19 20}

When our government casts all Asian spa workers as victims with no agency and then, in the name of national security and anti-terrorism, purchases hand jobs from them, charges them with prostitution or unlicensed massage, and deports them, it indicates a level of doublethink reminiscent of George Orwell's *1984* or Margaret Atwood's *The Handmaid's Tale*.

Homeland Security in the Records

On April 18, 2013, the Department of Homeland Security's Office of Intelligence and Analysis and the Immigration and Customs Enforcement's Homeland Security Investigations (ICE HSI) released a document entitled *Human Trafficking Referral Protocol For Fusion Centers*.²¹ The document, which was included in BlueLeaks, explains that ICE HSI "conducts criminal investigations against terrorist and other criminal organizations who threaten national security." It goes on to explain that this includes "human trafficking, human rights violations, human smuggling, smuggling of narcotics, weapons and other types of contraband, financial crimes, cybercrime and export enforcement issues, and immigration crime."

The document includes information about the HSI Tip Line and tip referral process. Appendix A of the document contains the federal criminal definitions (at the time) of smuggling, forced labor, labor trafficking, and sex trafficking. Appendix C is a list of human trafficking indicators. It starts off with things that make sense: "Is the individual being forced to perform sex acts?" "Can the individual freely contact friends and family?" but then devolves into indicators of prostitution and criminalization: "Does the individual display fear of law enforcement, or refuse to speak to law enforcement?" "Was the individual found carrying, or in a location with, commercial sex paraphernalia?" There are no corresponding indicators of labor trafficking that would be inclusive of all labor, or all labor within any other industry, despite the fact that there are industries with much higher rates of trafficking than the sex industry, like agriculture, home health care, and mining.

Throughout the records, documents from the Department of Homeland Security's Blue Campaign urge officers to call Immigrations and Customs Enforcement (ICE) if they suspect a person may be a victim of human trafficking.

An undated 2020 document²² from the Homeland Security Investigations Human Trafficking and Smuggling Group features two pictures of a blond haired, blue eyed woman - we'll call her Anna - and is labeled, "Attempt to Locate & Arrest: [name] Possible Human Trafficking Victim in Los Angeles." It describes "Anna" as 20 years old and "possibly with other females conducting commercial sex acts in both Los Angeles and the Inland Empire."

In 2024, "Anna" was arrested by detectives from the Bakersfield Police Department after she "agreed to conduct vaginal sex" for \$100 with Detective Barthelmes. The Offense Report says that Anna's phone "had a message on it from 'Daddy' which I know is often times what a commercial sex worker calls her exploiter." Anna was transported to Homeland Security Investigations where she declined to answer questions, after which she was booked at the Kern County Jail for prostitution.

18 (2021, December 19). *Tracy Quan: Don't forget — The Georgia shootings are a hate crime against sex workers*. Yahoo! News. Retrieved February 4, 2025, from <https://www.yahoo.com/news/tracy-quan-dont-forget-atlanta-220820373.html>

19 Lam, E. (2018). *Behind the Rescue: How Anti-Trafficking Investigations and Policy Harm Migrant Sex Workers*. Butterfly Network. https://www.researchgate.net/publication/343685482_BEHIND_THE_RESCUE_How_Anti-Trafficking_Investigations_and_Policies_Harm_Migrant_Sex_Workers

20 (2019). *Safeguarding the Human Rights and Dignity of Undocumented Migrant Sex Workers*. Platform for Cooperation of Undocumented Migrants. <https://picum.org/wp-content/uploads/2019/09/Safeguarding-the-human-rights-and-dignity-of-undocumented-migrant-sex-workers.pdf>

21 https://drive.google.com/file/d/1xzYLvi5G6XpqPJ4M7O4tg6tcwRLiPBab/view?usp=drive_link

22 https://drive.google.com/file/d/1R1-QFkk2SH0lxQcwf0xLr4_nHYmMTJK/view?usp=drive_link

Detective Kennedy wrote a search warrant for “Anna’s” phone “regarding pimping, pandering, and/or human trafficking.” The warrant was approved by Judge Stephanie Childers, and the Bakersfield Police Department’s Digital Forensic Unit uncovered that Anna had used “websites known to be used by commercial sex workers.” She served one day in jail and was fined \$425.²³ The story of this woman clearly arrested and fined for prostitution illustrates how HSI uses doublespeak to justify its mission creep into defending the homeland from “sex trafficking”.

Of the 163 offense incident reports sent to us by the Miami Dade Sheriff’s Department on behalf of the Miami Dade Fusion Center, all of which referenced prostitution or sex trafficking, ICE HSI was involved in 15 sex trafficking investigations. One offense incident report describes a sting operation in which Homeland Security arrested four men who agreed to meet fictitious minors²⁴ for sex and apparently were charged with sex trafficking under the section added to the federal sex trafficking code (18 U.S. Code § 1591) in 2015 that made agreeing to pay for sex with a minor sex trafficking. Just ten days earlier, a news article²⁵ announced that the Miami Dade Police Department had received over two million dollars to carry out such stings. The offense report describing the sting reads:

ON FRIDAY, JANUARY 21, 2022, THROUGH SATURDAY, JANUARY 22, 2022, HOMELAND SECURITY INVESTIGATIONS (HSI) MIAMI AND THE MIAMI-DADE POLICE DEPARTMENT HUMAN TRAFFICKING SQUAD INITIATED OPERATION “PEDO TO THE METAL.” THE PREMISE OF THIS INVESTIGATION ENTAILED HSI MIAMI, IN AN UNDERCOVER CAPACITY, POSTING DECOY ADVERTISEMENTS FOR COMMERCIAL SEX VIA WELL-KNOWN WEBSITES SUCH AS SKIP THE GAMES, MEGAPERSONALS AND ONLY FANS. AS SUBJECTS ANSWERED THESE ADS, HSI MIAMI UTILIZED UNDER COVER AGENTS (UCA) TO ENGAGE IN CONVERSATIONS WITH FOUR TARGETS, WHO ULTIMATELY WANTED TO ENGAGE IN SEX WITH MINORS. ONCE THE CONVERSATIONS BETWEEN UCA’S AND THE FOUR TARGETS MET THE ELEMENTS OF 18 USC 1591, THE SECOND PHASE OF THE UCA ACTIVITY COMMENCED THROUGH A PHYSICAL MEETING. DURING THE MEETINGS, UCA’S ENGAGED IN ADDITIONAL CONVERSATIONS WITH THE HUMAN TRAFFICKERS AND TOOK PAYMENT FOR THE COMMERCIAL SEX SERVICES. THE PHYSICAL MEETINGS, COUPLED WITH THE UC CHATS, PROVIDED THE EVIDENCE NECESSARY FOR FEDERAL PROSECUTION.

Other reports involving HSI described minors who were advertising on prostitution websites being “recovered” with no apparent sex traffickers involved. None of the cases in which HSI investigated a missing minor and no report from an institution resulted in arrests. All arrests related to actual, non-fictitious victims were a result of victims reaching out to police, either via 911, a hospital, or an attorney during a domestic violence proceeding.²⁶

23 https://drive.google.com/file/d/1BibKkCvIQF4AuF6gyBK6DucDOOOEVIId/view?usp=drive_link

24 Sex with fictitious or imaginary minors is advertised by police online as part of “sex trafficking” stings.

25 (2022, January 11). *Miami-Dade Police Secures \$2.3M For Human Trafficking Prevention, Healing*. NBC Miami. Retrieved March 15, 2025, from <https://www.nbcmiami.com/news/local/miami-dade-police-secures-2-3m-for-human-trafficking-prevention-healing/2659003/>

26 https://drive.google.com/file/d/1AWQtq3GnL_xSr6Guzx8NbHsmXITok59R/view?usp=drive_link

2 The Conflation of Prostitution, Sex Trafficking, and Terrorism Has Been Deliberate and Methodical

Prostitution as Sex Trafficking

Doublethink, a term coined by George Orwell in his dystopian 1949 novel *Nineteen Eighty-Four*, describes the act of simultaneously accepting two contradictory beliefs as correct. In the criminalization of sex work, this manifests as the belief that all prostitutes are simultaneously victims and evil traffickers. Doublethink is a form of cognitive dissonance that allows individuals and institutions to reconcile conflicting ideas, though at the expense of intellectual integrity. The deliberate and methodical use of doublethink has created an ideological space where no one questions sex trafficking victims being charged federally with conspiracy to commit sex trafficking and sentenced to decades on the sex offender registry²⁷ or police getting handjobs before “rescuing” sex workers by arresting them.

Corrupt governments weaponize doublethink as a tool of social control. By disseminating contradictory information through propaganda and carefully constructed narratives, they foster a climate of confusion, uncertainty, and fear, ultimately distorting the public’s perception of reality. In this manipulated environment, citizens may readily accept contradictory claims as truth, even if they defy logic or evidence. Such manipulation can be used to justify oppressive policies, silence dissent, and perpetuate the government’s power – the definition of a psyops campaign.

Our team has amassed a library of documents illustrating how this doublethink has spread, like a cancer, over time. At the same time, there is plenty of evidence in older documents, those concerning individual sex workers in particular, that federal law enforcement officers understand the difference between prostitution and sex trafficking and acknowledge that independent sex workers exist. For instance, one 2020 special bulletin explicitly states that a suspect “is a commercial sex worker who often poses as a high-end escort, call-girl, or casino shill.” Similarly, a 2019 document entitled “Missing Adult/Involved In Prostitution?CANCEL”²⁸ notes that, “Kayla has a history of voluntary prostitution.” These instances, among others, demonstrate that as recently as 2020, the FBI recognized that individual sex workers can and do operate autonomously.

In a 2020 Situational Report, the FBI described an independent escort explaining how sex workers use SnapChat for marketing, acknowledging that sex workers are autonomous business owners capable of creative marketing.

The agency’s internal understanding, however, is often at odds with public-facing narratives that demonstrably evolve throughout the documents over time in their conflation of sex work with sex trafficking. A 2011 training document, entitled *Human Trafficking Protocol for Law Enforcement 2011*,²⁹ while acknowledging that not all prostitution constitutes sex trafficking, still refers to prostitution as one of several “primary sources” of trafficking. This language creates a subtle association between the two, laying the groundwork for future conflation.

27 Mogulescu, K., & Goodmark, L. (2020). Surveillance and Entanglement: How mandatory sex offender registration impacts criminalised survivors of human trafficking. *Anti-Trafficking Review*, (14), 125 – 130. <https://www.antitraffickingreview.org/index.php/atrjournal/article/view/450>

28 https://drive.google.com/file/d/1bcCkX30ewksnIokAugBNSAA6or9y0UQw/view?usp=drive_link

29 https://drive.google.com/file/d/16WGvFubuxw_EQI6o1HLOO8oMTe0kGjZU/view?usp=drive_link

UNCLASSIFIED//LES



**SITUATIONAL INFORMATION REPORT
FEDERAL BUREAU OF INVESTIGATION**

**Tradecraft Alert
DENVER DIVISION**

Approved for Release: 27 February 2020

SIR Number: SIR-00331314945

(U//LES) Use of Snapchat to Find Escort Clients and Network in the Denver Area of Responsibility, as of January 2020

SOURCE: (U) A contact who is reporting for the first time.

(U//LES) As of January 2020, an identified escort reported escorts are using the social media application, SnapChat, to find new clients. The escorts use SnapChat premium to send escort photographs from their advertisements to user's private inboxes. The escorts will send their Cash App account information with the photographs. If the client pays the escort, the escort sends more explicit photographs or if they are in the same area, the client and escort meet up for an in-person meeting.

Following the dissemination of the above-mentioned protocol, also in 2011, then-California Attorney General Kamala Harris co-authored a letter³⁰ to Backpage.com that characterized prostitution as intertwined with the sex trafficking of minors. In 2012, the Central California Intelligence Center began sending requests³¹ to law enforcement agencies to submit more suspicious activity reports about sex trafficking. In 2014, a California Bi-Weekly Report³² unequivocally conflated prostitution and sex trafficking of minors, saying, "On 25 June, the FBI shut down MyRedBook.com, a website alleged to facilitate prostitution, as part of a larger effort to combat the sex trafficking of minors."

Still, at this stage, doublespeak had not been adopted across the board. *The 2013 Gang Report*,³³ an FBI publication, explained that gangs continued to expand into both prostitution and trafficking, acknowledging them as two different things.

A 2014 Situational Information Report³⁴ by the San Diego FBI presented commercial sex as one of the industries that trafficking could happen in, clarifying that trafficking does not happen all the time in any of the listed industries. It listed agriculture and tourism as two key industries where human trafficking happens in San Diego.

30 https://drive.google.com/file/d/1MpWP6BZal4Q3CzZZTLhmU-RhgWd7MUy/view?usp=drive_link

31 https://drive.google.com/file/d/1BXwp12FpSx1TsOwKpd3DftHfcbcB-mLT/view?usp=drive_link

https://drive.google.com/file/d/1DbkKRICeZQJS3xUjo0Nk8EFWLHw-OYG/view?usp=drive_link

32 https://drive.google.com/file/d/1zbXYSAY4qrxLzOpqB5aFzC8d_yoR3b7A/view?usp=drive_link

33 https://drive.google.com/file/d/1WQG87bsDMTUUhtUa2VKSxNvRPNeQYLE8/view?usp=drive_link

34 https://drive.google.com/file/d/1YoxNHDTmOoMaegM7kW_IKsVpgRg8-Cl-/view?usp=drive_link

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REQUEST FOR INFORMATION

22 July 2014

(U) Request for Information Relating to Human Trafficking Activity in the Eastern District of California

(U//FOUO) The Central California Intelligence Center (CCIC) is disseminating this request for suspicious activity reports (SARs) regarding human trafficking. The CCIC uses information obtained from human trafficking SARs to identify suspects and networks; to link suspects to victims; to identify tactics, techniques, and procedures (TTPs) used by traffickers; and to facilitate relationships between agencies charged with human trafficking investigations. Statistical data collected from SARs is used to assist the California Attorney General's Office with assessing the scope of human trafficking throughout the state of California.

Another 2014 Situational Information Report from the FBI Los Angeles Division,³⁵ entitled *Methods Used By an Identified Escort Agency to Prostitute Females in the Los Angeles Area* explained the day to day operations of an escort agency, as described by a “collaborative source with excellent access.” The report explains that escorts contact the agency to express their interest in working, provide their ID, and are paired with a driver who also acts as a security guard. The report contains no references to sex trafficking, but dedicates an entire paragraph to describing safety measures:

Security measures were used by escorts. A series of text message communications would transpire throughout the course of the “date.” Escorts would first text the escort agency and the driver when they arrived at the client’s door. If the “date” took place at a hotel, the escort would text the client’s room number. Then, a text message was sent to inform the agency and driver that she made contact with the client. A subsequent text message would reveal that the escort had the money in hand and she was okay. A final text message from the escort would inform the agency and driver that the “date” was complete. During the “date,” the driver would often remain in the car if the “date” was located at a residence. If a “date” took place at a hotel, the driver might loiter in the hotel lobby or walk by the hotel room to gain familiarity of the location in the event the escort needed assistance. All other times, the driver would remain in the vehicle until the “date” was complete.

By 2020, though, doublespeak seemed to have achieved critical mass when an FBI Emerging Intelligence Report³⁶ referred to sex work advertising websites as “website[s] catering to the sex trafficking industry.”

In March 2024, documents³⁷ provided by the California Office of Emergency Services showed full consistency in the renaming of prostitution as sex trafficking:

35 https://drive.google.com/file/d/1PLGZMOsFgv3AuCUdKs6W-z7is_URXl8P/view?usp=drive_link
36 https://drive.google.com/file/d/1mXfPEiaMAc2PT8Z-jHntXqx3ErgYzEMD/view?usp=drive_link
37 https://drive.google.com/file/d/1Fkt6xShlUX6KCVIKZq3aEve02snlLa_6/view?usp=drive_link

(U) Florida – 228 Arrested During ‘Operation March Sadness’³⁸ Human Trafficking Bust (U) Miami – 228 arrests were made by a Florida sheriff’s office during an eight-day human trafficking operation targeting prostitution. The undercover operation, which began on 22 February and targeted suspects involved in soliciting prostitutes, offering to commit prostitution, or aiding and abetting prostitutes. 150 suspects were arrested for soliciting a prostitute, and traveling to the undercover location to negotiate having sex in exchange for money. Twelve other suspects were arrested, and of those, eight were either deriving proceeds from prostitution or transporting prostitutes to the undercover location. During the operation, 13 possible human trafficking victims were identified of the 66 prostitutes who were arrested. SOURCE: 5 March 2024, NBC6

This deliberate shift in language and understanding, where differences between the legal definitions of sex work and sex trafficking were gradually eroded, took place over less than two decades. The resulting false construct has generated damaging consequences endangering both sex workers and sex trafficking survivors, diverting federal dollars into fighting the false construct, redirecting local police resources from addressing violent crime into prostitution sting operations, and setting the stage for broad violation of citizens’ privacy rights and body autonomy.

The Leap to Terrorism

Among the documents we received from the Rhode Island Fusion Center was a white paper from the Soufan Center (a nonprofit institute founded by former FBI special agent Ali Soufan), entitled “Quantifying the Q Conspiracy: A Data-Driven Approach to Understanding the Threat Posed by QAnon”³⁹ that analyzes QAnon conspiracy theories and their potential threat to U.S. national security. The paper explains that QAnon frequently uses false narratives about sex trafficking of children as a recruitment tool, exploiting the emotional intensity of “fake news” about the sex trafficking of children to further heighten its impact. The paper describes how this tactic preys on people’s fears and vulnerabilities, hindering their ability to critically evaluate the information presented. With former intelligence agents thickly populating its ranks, the Soufan Center might be considered “government-adjacent”; this instance of former agents “telling on” the government shows us again that the tactics of doublespeak are understood and deliberate.

The government’s own rhetoric surrounding the “sex trafficking industry,” the “threat of online commercial sex,”⁴⁰ and the dissemination of falsehoods about the sex trafficking of children has been seen to impede on the public’s capacity for rational and critical thought. The narratives generated by these public misinformation campaigns are further amplified by talking head parrots, fearmongering media coverage, and misguided public discourse, creating a climate of urgency and outrage. A cottage industry of Christian nonprofits providing “services to trafficking victims” promotes these narratives in press releases and junkets; a recent example is the false and misleading January 2025 Super Bowl anti-trafficking media campaign organized by It’s A Penalty⁴¹ and paid for by federal and corporate funders. Policymakers are driven to reactive, fear-based policy responses to these narratives. People with decision-making responsibilities literally believe that Homeland Security Investigators getting handjobs from women they deem victims before arresting and deporting them is justified.

38 Many prostitution sting operations are named in jest, like this one which plays on the “March Madness” play off season, demonstrating how seriously police take “human trafficking” operations.

39 https://drive.google.com/file/d/1W0IPi-WgxB9na1HG81PQ2nbcB00RY4z-/view?usp=drive_link

40 https://drive.google.com/file/d/1mXfPEiaMAC2PT8Z-jHntXqx3ErgYzEMD/view?usp=drive_link

41 <https://itsapenalty.org>

Whether out of fear or as a cynical career move, these legislators create whatever laws police recommend to save the children, without stopping to critically consider that much of this legislation would actually increase sex trafficking.

Deliberate governmental manipulation of perception is evident in various official documents. For instance, the 2022 Annual Threat Assessment of the U.S. Intelligence Community,⁴² released by the Office of the Director of National Intelligence, explicitly links trafficking to national security threats, saying “Human trafficking, including sex trafficking and forced labor, is not only a violation of human rights and freedoms but a threat to U.S. national security and economic development and is enabled by corrupt actors and networks that fuel the growth of transnational organized crime.” Other reports, like an October 2021 issue of the Counter Terrorism Digest,⁴³ casually list “sex worker” alongside roles like “informant” and “money service provider” in the context of refugee camps. The 2020 Homeland Threat Assessment⁴⁴ further blurs the lines by presenting massage businesses as synonymous with sex trafficking and smuggling.

This deliberate false portrayal of prostitution as a threat to national security creates a fertile ground for the manufacture of a moral panic. This heightened emotional climate, fueled by misinformation and fear, suspends critical analysis. It hijacks the public’s knowledge of sex work to reframe it as something that requires state intervention, paving the way for the acceptance of unconstitutional and increasingly draconian policies targeting sex workers and sex trafficking survivors, all under the guise of saviorism, ultimately eroding civil liberties on a massive scale.

What Is Terrorism Anyway? A Brief History

The rhetoric and policies surrounding terrorism in the United States have long been used to justify the surveillance and criminalization of marginalized communities. Following 9/11, laws like the USA PATRIOT Act disproportionately targeted Muslim and immigrant populations as threats to national security, even going so far as to institute a no-fly list for targeted populations, while far-right white extremism received disproportionately little scrutiny. These measures also served to expand state power, using intellectually corrupt, highly subjective targeting tools like racial profiling and preemptive policing based on association rather than investigating actual criminal activity to prevent crime. In the fearful post-9/11 environment, the state’s rhetoric ultimately incited criminal activity against Muslims and immigrant people, resulting in acts of racist vigilantism taking place into the present day.

The Intelligence Reform and Terrorism Prevention Act,⁴⁵ which in 2004 established a Human Smuggling and Trafficking Center to aid in stopping “terrorist travel,” has also been leveraged against sex workers under the assumption that all sex workers who travel are engaged in trafficking, which it defines as a form of terrorist travel. This misuse of counterterrorism rhetoric is only one example of a broader pattern in which laws meant for security are weaponized to police already vulnerable populations, restrict movement, and incite public surveillance that results in people of color being flagged by airline personnel, to then be interrogated by law enforcement, leading to assaults, arrests, and deportations.

42 https://drive.google.com/file/d/1s-GXRiMfT5icvZPuvGhkJGwG8sunrbPa/view?usp=drive_link

43 https://drive.google.com/file/d/1Qa7K9d8Ax07x7fUfgF_1121XWSMbauv/view?usp=drive_link

44 https://drive.google.com/file/d/18DN6RWlqLMbmXgLCvXHsYRdHyJKb6huo/view?usp=drive_link

45 (2004, December 17). S.2845 - *Intelligence Reform and Terrorism Prevention Act of 2004*. CONGRESS.GOV. Retrieved March 15, 2025, from <https://www.congress.gov/bill/108th-congress/senate-bill/2845>

Despite the increasing threat of white supremacist and far-right violence, counterterrorism efforts continue to focus disproportionately on marginalized groups, with transgender people recently being targeted by Elon Musk as terrorists⁴⁶. We are reminded that state misdemeanor laws (now co-opted by counterterrorism units), and police forces themselves, have their roots in catching enslaved people. The inconsistent application of counterterrorism laws, seen in the muted response to the January 6th insurrection compared to the aggressive policing of Black Lives Matter protests, highlights the way counterterrorism policy is deployed as a means of social control rather than a genuine effort to prevent violence. Recognizing this disparity can help us understand how and why the U.S. security apparatus addresses sex workers as terrorists.

3 Legal, Online Sex Work is Also Targeted

In May 2019, just thirteen months after the federal seizure⁴⁷ of the sex work advertising website BackPage, the FBI Baltimore Division sent out a Situational Informational Report⁴⁸ saying that “Commercial Sex Services” had migrated to OnlyFans, a subscription based website for online content creators. OnlyFans is one of several similar services that allow sex workers to host content and sell it on an individual basis or via a monthly subscription. Such sale of self-produced online content by and to adults is legal and, like other similar platforms, OnlyFans adheres to legal and payment processor regulations by mandating age verification and compliance forms for all models appearing on the site. Furthermore, OnlyFans does not allow their site to be used by sex workers who advertise as escorts and has banned terms such as “meet” and “young” from being used on their platform. Bans of content creators by OnlyFans can also seem arbitrary; some sex workers speculate that OnlyFans uses AI to find pictures and videos of sex workers on their platform that were shot in hotel rooms, as OnlyFans may believe these are more likely to be made by escorts, whom they actively ban from their platform. The exclusion of direct service sex workers from participating in legal online sex work, especially during a global pandemic, can cause irrevocable harm, including housing and food insecurity, heightened vulnerability to predators and exploitation, and increases in street based sex work workforces.

The FBI report notably included a list of OnlyFans’ payout processors – the entities used to deposit sex workers’ earnings into their accounts. In August 2021, after a lockdown earnings bonanza generating \$932 million in net revenue from the labor of erotic content creators – a 160% increase from the previous fiscal year⁴⁹ – OnlyFans CEO Tim Stokely announced his controversial decision to cease publication of sexually explicit content, effectively eliminating the livelihoods of hundreds of thousands of online sex workers who had made him a multi-millionaire, leaving them without livelihoods amidst a global health crisis. While Stokely attributed the policy change to payment processors, he specified that the obstacle was not the credit card processors who process payments to the website, as has often happened. Instead, Stokely said that Bank of New York Mellon had blocked the deposit of sex workers’ earnings into their accounts.⁵⁰ This harmed OnlyFans’ reputation with sex workers, whose payments were delayed, ultimately hurting OnlyFans’ business indirectly by attacking sex workers’ financial security.

46 (2025, March 21). *Elon Musk Is Trying to Blame Tesla Vandalism on “Trans Violence”*. Them. Retrieved March 23, 2025, from <https://www.them.us/story/elon-musk-blame-tesla-vandalism-trans-violence-twitter-misinformation>

47 (2018, April 9). *Justice Department Leads Effort to Seize Backpage.Com, the Internet’s Leading Forum for Prostitution Ads, and Obtains 93-Count Federal Indictment*. U.S. Department of Justice. Retrieved March 15, 2025, from <https://www.justice.gov/archives/opa/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution-ads>

48 https://drive.google.com/file/d/1epzqAYc4W0m8h11ba014kvoxaat01vC/view?usp=drive_link

49 (2022, September 1) Variety Magazine: *OnlyFans Creators Earned \$3.9 Billion in 2021, Swelling 115% Year Over Year*: <https://variety.com/2022/digital/news/onlyfans-financials-earnings-creators-1235357264/>

50 (2021, August 24). *Why did OnlyFans ban sexually explicit content? It says it’s the credit card companies*. CNN. Retrieved March 15, 2025, from <https://www.cnn.com/2021/08/20/tech/onlyfans-explicit-content-ban-payment/index.html>



SITUATIONAL INFORMATION REPORT
FEDERAL BUREAU OF INVESTIGATION
Potential Activity Alert
BALTIMORE DIVISION

Approved for Release: 10 April 2020

SIR Number: SIR-00332993992

(U//FOUO) Potential Hosting of Private Parties and Increase in Activity on 'OnlyFans' Website by Sex Workers In Response to COVID-19 Restrictions, as of April 2020

SOURCE: (U//FOUO) An FBI Agent.

(U//FOUO) FBI Baltimore is releasing this Situational Information Report to raise law enforcement awareness regarding members of USASexGuide.nl hosting and attending private parties with strippers who are out of work and need income in response to COVID-19 social restrictions. Additionally, the potential increase in the use of paid subscription content services, such as OnlyFans, by sex workers in the Baltimore area may exist due to COVID-19 restrictions.

(U//FOUO) As of April 2020, an identified USASexGuide.nl user created a forum post in the 'Strip Club Reports' section of Baltimore with the subject, "Private party," and indicated the intent to host a private party at their residence in Abingdon on Sunday, April 5 due to the "girls out of work that need income" (NFI). The user invited only senior members to contact them for further information (NFI).

(U//FOUO) As of April 2020, users on USASexGuide.nl who posted on the Baltimore forums indicated the use of the 'OnlyFans' website by strippers to post who they are, their location, and make dates (NFI). 'OnlyFans' is a paid subscription content service which allows content creators to post and receive compensation from subscribers, also known as "fans." Access to the website is restricted to members, who are charged a subscriber fee. The website allows clients to select individuals for "dates."

The OnlyFans debacle exemplifies a concerning trend of financial institutions closing adult film performers' bank accounts. During Operation Choke Point,⁵¹ a Department of Justice operation that allegedly ended in 2017, the department asked banks to identify customers who were "simply doing something government officials don't like. Banks then 'choke off' those customers' access to financial services, shutting down their accounts."⁵² In other words, Operation Choke Point was created to close the bank accounts of legal sex workers who had not broken any laws.

In April 2020, almost a year after its 2019 "Commercial Sex Services" report, the FBI Baltimore Division released another report centering on legal sex workers, this time strippers *and* content creators on OnlyFans. The report highlighted a post from a Baltimore strip club message board, where an individual posted, "Guys. I'm setting up a private party. As discussed, there are girls out of work that need income. Details will only be messaged, and only to Senior members. Shooting for this Sunday April 5. There will be limited slots available. Contact if interested."⁵³ It is unclear why the FBI felt it was appropriate to send a situational alert about sex workers engaging in legal stripping and online content creation work through a system intended to keep law enforcement informed about potential terrorism. If the stakes were not so high, we might wonder whether "situational alerts" are a euphemism for locker room talk.

51 (n.d.). *Operation Choke Point*. Wikipedia. Retrieved March 15, 2025, from https://en.wikipedia.org/wiki/Operation_Choke_Point
52 (2014, April 21). *Justice Puts Banks in a Choke Hold*. Wall Street Journal. Retrieved March 15, 2025, from <https://www.wsj.com/articles/SB10001424052702304810904579511911684102106>
53 (2020, April 2). *Strip Club Reports*. USA Sex Guide. Retrieved March 15, 2025, from <http://www.usasexguide.nl/forum/printthread.php?t=3896&pp=15&page=270>



(U//FOUO) Domestic Sex Traffickers Very Likely Increasing Use of Messaging Applications and Websites Due to Public Health Travel Restrictions Surrounding Coronavirus Disease 19. Expanding Online Sexual Exploitation

(U) This document is classified: Unclassified//For Official Use Only
(U) EIR template approved for fiscal year 2020, as of 1 October 2019.

(U//FOUO) The FBI assesses domestic sex traffickers very likely⁵ will increase their use of mobile messaging applications and websites due to public health travel restrictions surrounding coronavirus disease 19 (COVID-19),⁶ expanding the threat of online commercial sexual services in the United States. This assessment is made with medium confidence,⁷ based on FBI investigations and open source reporting. The FBI assumes travel and gathering restrictions will reduce demand for in-person commercial sexual services, as will fears of contracting the virus through close intimate contact. The FBI also assumes individuals seeking services from trafficked individuals who are unable to travel to large events will move to online platforms and applications to access commercial sex services. If these assumptions are incorrect, no changes in online or in-person commercial sexual services will be evident and the FBI's confidence in this assessment would decrease. The FBI bases this assessment on well-documented increases in domestic sex trafficking activity during large sporting events and professional conferences, as well as robust media coverage surrounding the limitation of movement and the increasing recommendations for social distancing associated with the COVID-19 pandemic.

- (U) According to open source reporting, the US Government established travel restrictions imposed on both domestic⁸ and foreign⁹ destinations to stem the spread of COVID-19, as of March 2020. Additionally, numerous

major sporting events^{5, 4, 5} and professional conferences^{6, 7} were cancelled or postponed in response to recommendations by the Centers for Disease Control and Prevention⁸ and the World Health Organization.⁹

- (U) As of 15 March 2020, a website catering to the sex trafficking industry contained an online prostitution advertisement from San Diego, California, stating "DUE TO THE CORONAVIRUS-Web Cam Play is Available for [mobile payment] users."¹⁰
- (U) As of 14 March, a website catering to the sex trafficking industry contained an online prostitution advertisement from Atlanta, Georgia, stating "Until this pandemic of coronavirus is contained, I will not be seeing any in or out clients. I can be seen vicariously through indirect contact via this link below:"¹¹
- (U) According to FBI investigations, as recently as January 2020, high-profile, large-scale events were documented by law enforcement as lucrative arenas for adult and juvenile sex trafficking enterprises to operate. Events such as the National Collegiate Athletic Association Men's Basketball Final Four,¹² professional sporting events,¹³ and national conferences, attract participants and spectators from across the United States,

⁵ (U) See Appendix A: Expressions of Likelihood.

⁶ (U) The Centers for Disease Control and Prevention has documented the recent outbreak of a respiratory disease caused by a novel coronavirus that was first detected in China and which has now been detected in more than 100 locations internationally, including the United States, as of 12 March 2020. The virus was named SARS-CoV-2 and the disease it causes has been named coronavirus disease 2019, abbreviated COVID-19.

⁷ (U) See Appendix B: Confidence in Assessments and Judgments Based on a Body of Information.

⁸ (U) Social distancing is defined as maintaining a minimum of 6 feet distance between oneself and anyone who is coughing or sneezing.

On April 3, 2020, the FBI Washington Field Office released an “Emerging Intelligence Report” that appeared to conflate legal online sex work with sex trafficking and terrorism. The report warned that the pandemic was increasing “the threat of online commercial sexual services” explaining that sex workers had posted on “website[s] catering to the sex trafficking industry” that they were not available in person and were offering online sessions during the pandemic. The FBI’s deliberate framing of legal online sex work as a national threat has potentially far-reaching implications for the surveillance and targeting of law-abiding workers, as well as for contributing to the diminishment of the FBI itself as a serious law enforcement agency.

The FBI’s heightened scrutiny and misportrayal of online sex workers during a time of economic precarity and increased vulnerability raises many concerns about the agency’s priorities and integrity. By conflating legal online sex work with sex trafficking and terrorism, the FBI not only perpetuates harmful stereotypes but also contributes to the further marginalization of a criminalized population, one that is disproportionately femme / queer / low income / people of color. This approach not only hinders efforts to combat actual instances of exploitation but also raises serious questions about the potential for overreach and abuse with no mechanism for accountability.

The Individual Prostitute As Terrorist

A Rhode Island State Fusion Center email⁵⁴ dated September 23, 2022, shows an anonymous public submission from “John Smith,” reporting “Prostitution/Escort.” The email quotes:

Multiple incidents of female offering private sessions and exchanging money for sexual activity. First offer was at Silhouettes Gentleman’s club not only was offered to me but also 2 of my buddys. This has been an ongoing offer with the same female for about a year now with numerous different people I see and know. She goes by [redacted] she is heavysset black female with leg tattoos. Even if you don’t get to check on the situation soon you may even send a text to [redacted] saying hey and you met her at the club and [want] to see her. She then will tell you her hourly rates. I have observed this situation many times in the past year I have spoken to the owner many times about this girl selling sex and they don’t seem to be doing anything about it because she is still working there.

Shortly after 1:00 a.m. on October 9th, Providence Police were patrolling the area “near” Silhouettes Gentlemen’s Club and detained a customer leaving the club, ultimately arresting him for illegal possession of a firearm that was located in his car.⁵⁵ In November, the club filed a federal lawsuit against the Providence Police Department alleging that they and their patrons had been discriminated against, leading to the closure of the club.⁵⁶ Would this have happened if information about a Silhouettes dancer had not been sent out by a fusion center under the precept of preventing terrorism?

Another⁵⁷ Rhode Island State Fusion Center email dated March 4, 2021, with the subject line “Information Only – Cash Exchange” contained a Suspicious Activity Report from a bank, saying:

54 https://drive.google.com/file/d/16viwEg3TIZUM3EhgtolZC5xlmjhUyn_L/view?usp=drive_link

55 (2022, October 9). *Providence police arrest man on gun charge*. 10 WJAR. Retrieved March 15, 2025, from <https://turnto10.com/news/local/gun-arrest-eddie-lee-providence-silhouettes-gentlemans-club-firearm-possession-charge-live-rounds-crime-october-9-2022>

56 (2022, November 18). *Silhouettes Gentlemen’s Club sues Providence police for racial profiling. What suit claims*. Providence Journal. Retrieved March 15, 2025, from <https://www.providencejournal.com/story/news/courts/2022/11/18/providence-police-silhouettes-gentlemens-club-lawsuit-racial-profiling-discrimination/69660429007/>

57 https://drive.google.com/file/d/1GaCylJ0FWxtYkAlnXfttYTMDJ3SXet_Z/view?usp=drive_link

On March 3, 2021, at approximately 1640 hrs, an individual attempted to exchange \$5,000 in \$20s for \$100s at the Navigant Greenville branch on Rt 44 in Smithfeild.

Unfortunately, the teller did not get a copy of the temporary license he attempted to use. She said his name was [redacted]. She thinks his last name may have been [redacted].

It is not unusual for a woman named [redacted] from Central Falls to do the same thing at various branches including the Greenville branch...

We have had at least one other woman who do [sic] the same thing on occasion [redacted]. She was tracked to Erotic Monkey escort service so I feel this could be related.

The above are examples of sex workers being reported by third parties. Things get more complicated when trafficking victims are presented as “terrorists.”

One example is the previously discussed 2020 bulletin⁵⁸ by Homeland Security Investigations, Human Trafficking and Smuggling Group indicating that “Anna”, a “possible trafficking victim” is wanted on a no bail warrant with full extradition out of Idaho. The bulletin advises that the victim/criminal/terrorist is “possibly with other females conducting commercial sex acts in both Los Angeles and the Inland Empire posing under the alias of “KIM.” The bulletin goes on to give the Internet based phone number she is using.

In another case, the FBI issued wanted posters⁵⁹ for a sex trafficker and a woman traveling with him who was likely his victim. While the trafficker was charged with three counts of sex trafficking by force, fraud, or coercion, and accused of using deception and threats to force women to engage in prostitution, the woman was only charged with conspiring with him to transport prostitutes across interstate borders. Her charge was apparently dropped. Still, the email sent out with the wanted posters read, “Please see the attached FBI BOLOs for two individuals wanted for allegedly running a multi-state prostitution operation... Both have outstanding warrants for Interstate Sex Trafficking and Prostitution.”

These cases illustrate how Suspicious Activity Reporting Initiative reports and Fusion Centers are used to target and surveil sex workers and sex trafficking survivors. The conflation of a sex worker with a trafficking victim with a “terrorist” rebrands misdemeanor prostitution as a felony and an immediate, high-risk threat to national security. The media framing, social death, and sentencing associated with this rebranding highlights the dangerous implications of conflating sex work with criminal and national security threats. Systematic punishment of women for their sexual behavior and/or sexual victimization is central to the War on Women; e.g., scapegoating and criminalizing sex workers, sex trafficking victims, and people in need of abortions transgresses bodily autonomy and oppresses an entire gender.

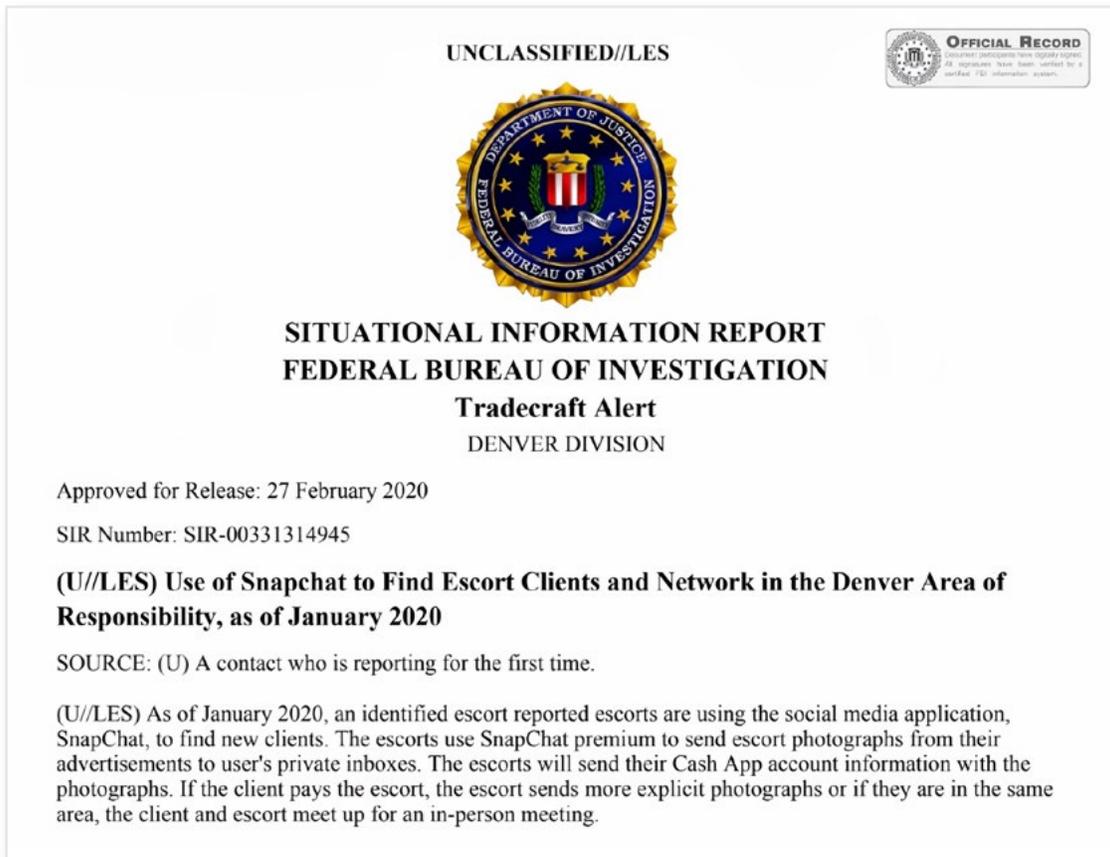
58 https://drive.google.com/file/d/1R1-QFkk2SH0lxQcwf0xLr4_nHYmMTJK/view?usp=drive_link

59 https://drive.google.com/file/d/1mowSmGKDApjaJXKpO3K4lwmFgGx4yhOK/view?usp=drive_link

4 Surveillance, Voyeurism, Obsession

What's made clear, throughout the documents, is that the government and its agents are obsessed with sex workers. Like incels who spend their screen time seeking revenge against women who reject them for sex, deputized Peeping Toms stalk sex workers and sex trafficking survivors for a living, institutionalizing their revenge against women who charge them for sex. It's the purest expression of patriarchy: Codifying the persecution and punishment of women who refuse to have sex for free.

The smallest details and most basic operations of our businesses are the subjects of breathless Situational Information Reports from the FBI:



As explored in previous sections, these Number One Fans spend millions surveilling individual sex workers and sex trafficking survivors. They feed their insatiable voyeurism with trainings, slideshows, and reports detailing the mundane ways we live our lives and run our businesses. Our everyday language, easily understood by anyone who takes five minutes to google, is, for them, a subject worthy of a multi-agency investigation:



Why?

Anne McClintock's 1992 article, "Screwing the System",⁶⁰ explains:

Prostitutes stand at the "flash points" of marriage and market, taking sex into the streets and money into the bedroom. Flagrantly and publicly demanding money for sexual services that men expect for free, prostitutes insist on exhibiting their sex work as having economic value. The whore stigma reflects deeply felt anxieties about women trespassing the dangerous boundaries between private and public. Streetwalkers display their sexual and economic values in the crowd—that social element permanently on the edge of breakdown—and thereby give the lie to the rational control of "deviance" and disorder. Hence the fetishistic investment of the law in violently policing the prostitute's body.

And:

The prostitution trial, conducted in a blaze of publicity, exposes its own structuring paradox, staging in public, as a vicarious spectacle, that which it renders criminally deviant outside the juridical domain. Through the mechanism of the prostitution trial, contradictions in the distribution of money, pleasure, and power are isolated as crimes and are then performed again in the theatrical ceremony of the trial as confession.

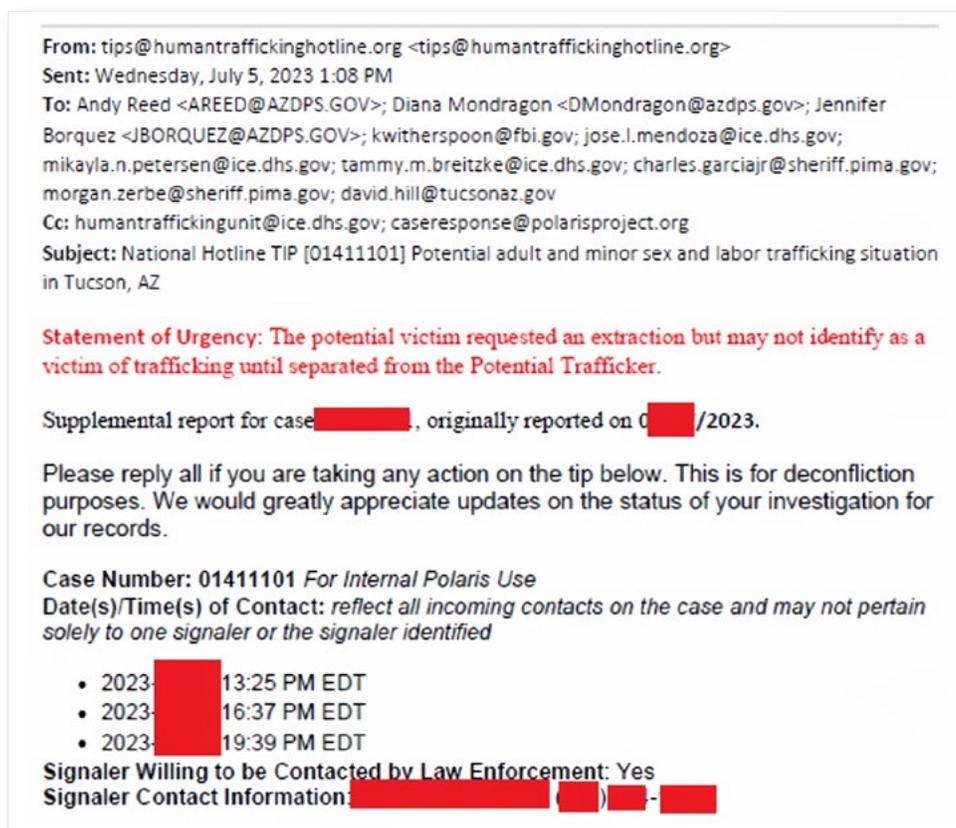
The relentless surveillance of sex workers⁶¹ by fusion centers is not about law enforcement—it is an obsessive ritual of control, a voyeuristic performance in which the state plays both the watcher and the judge. In scrutinizing the most mundane details of sex workers' lives, authorities indulge in a potent combination of fetish and sanctimony, reinforcing the same anxieties McClintock identified decades ago: fears of blurred boundaries between public and private, labor and intimacy, power and autonomy. In the end, this fixation is not about crime or national safety—it is about maintaining social and economic hierarchies as the dedicated observers, criminalizers, and punishers of women and others who refuse to obey. In constructing the category of prostitute/victim/trafficker, the patriarchal incel state has focused on women (including trans women) and children, almost entirely failing to surveil, harass, fetishize, and punish cis male sex workers.

60 McClintock, A. (1992). Screwing the System: Sexwork, Race, and the Law. *boundary 2*, 19, 70.

61 Grant, M.G. (2014). *Playing the Whore: The Work of Sex Work*

5 Survivors, Police, and Attorneys Report to the Human Trafficking Hotline When the FBI Does Not Return Calls

The Arizona fusion center documents, received just days before this report was due to be published, included several reports of sex trafficking received by Polaris Project's National Human Trafficking Hotline⁶² and forwarded to law enforcement officials. The National Human Trafficking Hotline has been criticized by survivors and advocates for being aligned with law enforcement over victims: unlike domestic violence or suicide hotlines, the National Human Trafficking Hotline reports calls to police with or without permission of survivors, even when the survivors or their family members may be endangered by these reports.⁶³ The reports reinforce these concerns, as several victims' and other reporters' names and phone numbers were provided to us in the documents. In the example below, the ESPLER team has made its own redactions in red. It is important that those who report sex trafficking always have their identities protected, as exposure can result in violent revenge by traffickers or their associates.



Several of the reporters, including victims, police, and an attorney, reported that they had attempted to report to other police agencies, usually the FBI, but had not been able to get a response. It was both very sad for our team but also validating to hear that we aren't the only ones to be met with seeming indifference from the same law enforcement agencies who so rabidly surveil and police us when we try to report serious and horrific crimes.

Our team lead, ESPLER Executive Director Maxine Doogan, spoke with four of those whose names and phone numbers appeared in the reports. All expressed frustration with police (non)response to their reports and lack of investigation or follow through. None said that their reports had resulted in an arrest of any kind.

62 National Human Trafficking Hotline <https://polarisproject.org/national-human-trafficking-hotline/>

63 The National Human Trafficking Hotline has been criticized by advocates for being aligned with law enforcement over victims, which threatens victims' safety in some cases: <https://freedomnetworkusa.org/app/uploads/2024/02/FNUSA-2024-TIP-Report-Input.pdf>

6

Online Sexual Abuse of Minors

Throughout the documents we gathered, it was clear that issues surrounding minors are complex and rarely aligned with popular propaganda of innocent children being kidnapped and held in sexual servitude. FBI situational alerts, training materials, and the Miami-Dade Police Department Offense Incident Reports all offered different perspectives which together paint a complex picture. Unpacking the topic of minor sex trafficking and other victimization is beyond the scope of this report, which focuses on a description of fusion center documents. An excellent resource for anyone seeking a deeper understanding of this topic is Dr. Alexandra Lutnick's book, *Domestic Minor Sex Trafficking: Beyond Victims and Villains*.

- **Other Law Enforcement involved:**

- **Detective Lobato** with the **Cortez, CO Police Dept.** is actively investigating this matter and *kindly requests any law enforcement agencies able to aid in his investigation to contact him directly.*
 - Cell: [REDACTED]
 - Desk: [REDACTED]
 - Email: [REDACTED]@co.gov
- Detective Lobato contacted an **unspecified FBI office** for support but is still awaiting further contact
- Detective Lobato advised there may have been prior investigations related to a parlor located in Flagstaff, AZ, however, further details related to this is unknown to the Hotline
- The Hotline is not aware of any other law enforcement involvement at this time

- **Other Law Enforcement involved:**

- **Community member**, [REDACTED], also attempted to reach out to **Delta Airlines** and the **FBI** but was unsuccessful in reaching anyone to report.
- The Hotline also attempted to report this situation to **JFK Airport Police**, in accordance with our reporting protocol.
 - Spoke with **Officer Carpentier** (Badge #2127)
 - Officer Carpentier declined to take the report, indicating only direct witnesses can report, and that the report would have to be in-person.
- The Hotline also attempted to report the situation to **TSA Contact Center** in accordance with our reporting protocol
 - Phone: **(866) 289-9673**
 - Unknown Operator declined to take a report from the Hotline
 - No identifying information about the operator was provided
 - The operator referred the Hotline to report to **ICE** or **HSI**.
- The Hotline attempted to report this situation to **NYPD Human Trafficking Hotline**
 - Phone: **(646) 610-7272**
 - Hotline spoke with: **Officer Benedict**, no badge number provided
 - Officer Benedict declined to take a report, but provided a referral to the **Port Authority Police**
- Upon recommendation from the Hotline, community member: [REDACTED] personally returned to JFK airport on **Sunday afternoon, 06/25/23** and reported to the **JFK Airport Police**.
 - [REDACTED] was interviewed by **Officer Joseph (Badge# 1775)** of the **Port Authority Police**
 - Address of Interview: **Port Authority Police Office, 269 Service Rd. Queens, NY**
 - [REDACTED] provided photographic evidence of the situation
 - Outcome: Officer Joseph indicated they planned to allow the unknown adult male potential traffickers and the unknown minor potential victims to pass the TSA security checkpoint, before separating the unknown minor potential victims from the unknown adult potential traffickers to investigate further
 - **Report number currently unknown:** Law enforcement informed James they would send him a copy of the report at an undisclosed date/time.
- There is no other known law enforcement involvement.

Miami-Dade Police Department Offense Incident Reports

Many Miami-Dade Police Department offense incident reports described minor sex trafficking investigations that were halted and the cases cleared after the minors denied being victims of sex trafficking. Some of the cases, like the one excerpted below, certainly seemed to warrant investigation:

ON MONDAY, JANUARY 4, 2021, AT APPROXIMATELY 10:55 A.M., DETECTIVE C. FELDER, AND I, MADE CONTACT WITH RG, AT JMH, ROOM 6057. AFTER SHORT GREETINGS, RG EXPRESSED WANTING TO BE RELEASED FROM THE HOSPITAL. WHEN ASKED WHY SHE TOLD THE DOCTOR THAT SHE HAD BEEN SEX TRAFFICKED, RG BECAME UNCOOPERATIVE, REFUSED TO CONTINUE WITH THE INTERVIEW. SHE WOULD ONLY STATE SHE IS ADDICTED TO CRACK COCAINE, AND WANTS TO GET BETTER. RG WOULD NOT RESPOND TO ANY QUESTIONS PERTAINING TO SEX TRAFFICKING, NOR WOULD SHE EXPLAIN WHY SHE TOLD DR. RIPPE THAT SHE HAD ENGAGED IN SEXUAL ACTIVITY FOR MONEY.

AT THIS TIME, THERE IS INSUFFICIENT EVIDENCE TO MERIT A HUMAN TRAFFICKING INVESTIGATION.

CASE DISPOSITION: EXCEPTIONALLY CLEARED.

Other cleared cases involved false accusations, sometimes personal in nature and other times from strangers who observed teen girls traveling with their fathers. Several reports were made because teen girls started to dress provocatively, began dating, or were in conflict with their parents, and these cases were also cleared when the teens denied being victims of human sex trafficking. Here is one example:

ON MONDAY, OCTOBER 28, 2019, APPROXIMATELY 5:15 P.M., THIS DETECTIVE MADE CONTACT WITH VICTIM, AFTER A FORMAL INTRODUCTION THIS DETECTIVE ADVISED THE REASON FOR THE INVESTIGATION. VICTIM ADVISED THAT SHE HAD BEEN HAVING PROBLEMS REGARDING HER RELATIONSHIP AT HOME WITH HER MOTHER . THIS DETECTIVE EXPLAINED TO VICTIM THAT WE HAVE SOME CONCERNS OF HER BEING A VICTIM OF HUMAN SEX TRAFFICKING BECAUSE THE RECENT CHANGES IN THE WAY SHE DRESSES. AT WHICH TIME, VICTIM DENIED BEING A VICTIM OF HUMAN TRAFFICKING, AND SHE BEGAN TO DRESS WITH MORE FORM FITTING CLOTHING TO FIT IN WITH HER FRIENDS.

AS OF THIS DATE THERE ARE NO OTHER INVESTIGATIVE LEADS TO FOLLOW THAT WOULD SUPPORT THE CONTINUING WITH A HUMAN TRAFFICKING INVESTIGATION.

CASE DISPOSITION: EXCEPTIONALLY CLEARED.

One report involving a young mother who had been a runaway and in and out of state custody for over a year and recently given birth to her first child read:

AT APPROXIMATELY 1:00 P.M., THIS DETECTIVE RESPONDED TO THE FACILITY LOCATED AT [REDACTED], MIAMI FLORIDA. AFTER A FORMAL INTRODUCTION AND THE REASON FOR THE INVESTIGATION, VICTIM ADVISED SHE HAS RECENTLY GAVE BIRTH TO A NEWBORN CHILD, WHICH IS CURRENTLY IN DCF CUSTODY IN THE TAMPA, FLORIDA AREA. VICTIM ADVISED SHE HAD PLANS OF MOVING TO TAMPA IN ORDER TO REGAIN CUSTODY OF HER CHILD. VICTIM DENIED BEING A VICTIM OF COMMERCIAL HUMAN SEX TRAFFICKING. VICTIM FURTHER ADVISED SHE WAS NOT HAPPY WHEN SHE WAS LIVING WITH HER MOTHER AND FELT THAT SHE WAS A BURDEN TO TAKE CARE OF. VICTIM WOULD NOT REVEAL HOW SHE WAS EARNING MONEY TO SUPPLY HER BASIC NEEDS OR WHO SHE WAS LIVING WITH WHILE ON RUNAWAY STATUS. THIS CONCLUDED THE INTERVIEW.

AS OF THIS DATE THERE ARE NO ADDITIONAL LEADS THAT WOULD SUPPORT THE CONTINUATION OF A HUMAN TRAFFICKING INVESTIGATION.

CASE DISPOSITION: EXCEPTIONALLY CLEARED.

Several other reports described teens being involved in prostitution with no trafficker. These minors meet the federal non-criminal definition⁶⁴ of a sex trafficking victim – any minor who has traded sex – despite no crime of sex trafficking occurring:

ON TUESDAY, JANUARY 12, 2021, THIS DETECTIVE RESPONDED TO THE JACKSON BEHAVIORAL HEALTH HOSPITAL AND MADE CONTACT WITH VICTIM [REDACTED]. AFTER A FORMAL INTRODUCTION AND THE REASON FOR THE INVESTIGATION, VICTIM [REDACTED] ADVISED THAT SHE HAS ENGAGED IN PROSTITUTION AS RECENT AS NOVEMBER- DECEMBER 2020. VICTIM [REDACTED] USES PROSTITUTION TO SUPPORT HER ADDICTION TO MARIJUANA, AND CRACK COCAINE. VICTIM [REDACTED] WOULD PROSTITUTE HERSELF FOR \$10 EACH DATE, APPROXIMATELY 3 TIMES A WEEK WALKING THE STREETS IN THE AREA OF [REDACTED]. VICTIM [REDACTED] ADVISED SHE WAS NOT BEING FORCED TO ENGAGE IN PROSTITUTION AND SHE DOES IT ON HER OWN. VICTIM [REDACTED] LEARNED ABOUT WHERE TO GO IN ORDER TO SOLICIT CUSTOMERS FOR PROPOSITION [SIC] BY HEARING OTHERS HAVING CONVERSATIONS OF PROSTITUTION AND THE SALES OF DRUGS IN THE AREA OF [REDACTED]. VICTIM [REDACTED] AGAIN DENIED BEING FORCED TO ENGAGE IN PROSTITUTION, IN FACT THERE HAS BEEN SEVERAL INDIVIDUALS THAT HAVE ATTEMPTED TO SEND HER HOME IN ORDER TO PREVENT HER FROM ENGAGING IN HARMFUL BEHAVIOR.

CHILD PROTECTIVE INVESTIGATOR LEANDRO RIPPE WAS CONTACTED AND INFORMED OF VICTIM [REDACTED] BEING ENGAGED IN PROSTITUTION TO SUPPORT HER DRUG ADDITION.,[SIC] HOWEVER SHE WAS NOT BEING FORCED INTO THE LIFE OF PROSTITUTION.

AS OF THIS DATE THERE ARE NO ADDITIONAL LEADS TO FOLLOW THAT WOULD SUPPORT A HUMAN SEX TRAFFICKING INVESTIGATION.

CASE DISPOSITION: EXCEPTIONALLY CLEARED.

Four individuals who agreed to pay for sex with fictitious online minors who were being pimped out by police officers were charged with sex trafficking of a minor. These were by far the majority of sex trafficking of minor arrests reflected in the reports.

64 Burns, T. (2024, June 25). *Using Non-Criminal Definitions of Sex Trafficking to Count Sex Trafficking Cases*. Tara Burns' journal. Retrieved March 23, 2025, from <https://taraburns.substack.com/p/using-non-criminal-definitions-of>

FBI Reports

FBI reports from 2013,⁶⁵ 2014,⁶⁶ and 2016⁶⁷ describe predators, traffickers, and gangs recruiting minors and marketing sexual services with minors on social media. A 2012 FBI Intelligence Note⁶⁸ details arrests of juveniles for prostitution in the western region of the United States in 2005 through 2009, finding a disproportionately high number of prostitution arrests of juveniles under the age of 13 in the entire region. There were 3,597 prostitution arrests of juveniles and more than 55% of the juveniles arrested for prostitution were described in an overtly racist framing as “black offenders.”

A 2014 FBI Situational Information Report⁶⁹ detailed indicators of child sex trafficking provided by “an identified former adult prostitute,” which included that their ads were simple, they often worked the street, and they were likely to provide shorter than standard appointments and unsafe services.

A 2017 FBI External Intelligence Report⁷⁰ describing children live streaming self produced child pornography reads:

The FBI assesses it is almost certain children, many pre-pubescent, are broadcasting live-streamed self-produced child pornography (CP) via the Live.me social media application (app). This assessment is made with high confidence, based on reporting from the National Center for Missing and Exploited Children® (NCMEC) CyberTipline® by private citizens with direct access, and corroboration from FBI and other law enforcement (LE) investigations in some instances. The FBI also assesses it is likely the popularity and features of the Live.me app influence children to continue to use the app, making it attractive to online sex predators. This assessment is made with medium confidence, based on reporting from NCMEC CyberTipline® by private citizens with direct access and on a LE referral to the FBI of public citizen reporting. A key assumption underlying these assessments is that most of the activity observed and reported depicts victims who were enticed, coerced, groomed, tricked, or extorted to engage in the sexually explicit behavior.

The documents reviewed in this section illustrate the complexity of online sexual abuse and trafficking of minors, highlighting discrepancies between legal definitions, investigative realities, and public perceptions. While some cases suggest clear exploitation, others involve minors engaging in prostitution without an identifiable trafficker, false allegations, fictitious victims, or investigations being closed due to lack of trafficking-specific evidence despite clear indications of child endangerment. Law enforcement documents also underscore complexities such as self-exploitation, complicating traditional narratives. These findings emphasize the need for honest policy discussions that address the root causes of vulnerability rather than relying on oversimplified and dramatized portrayals of trafficking and abuse that are used to promote public mind control and harmful laws.

65 https://drive.google.com/file/d/1VWMq7qvXD8-kURIEqQxMdfhm8mBvm3Zg/view?usp=drive_link

66 https://drive.google.com/file/d/11vLdjTENKu6dxEMboQv0qxnF2ulcq4LC/view?usp=drive_link

67 https://drive.google.com/file/d/1KDBzrvtVUnztd1UNqq1vcTXy0kJsPN38/view?usp=drive_link

68 https://drive.google.com/file/d/1RCTahFVmsVWKUJKCwpFZX_W60hJ8PUpc/view?usp=drive_link

69 https://drive.google.com/file/d/1RQ08AxHZWIIIM_tIWYCEUvwAOPm-HoK0/view?usp=drive_link

70 https://drive.google.com/file/d/1klPAY5BP74n0fR6tVgf1flrWMSIkYQN4/view?usp=drive_link



Policy Recommendations

If we don't have a transparent government, we don't have a good government.

All publicly funded activities, including law enforcement, are subject to public records requests, but any researcher or journalist would agree that law enforcement noncompliance is more commonplace than compliance.

To this end, ESPLER Project recommends that states and the federal government:

1. Establish clear guidelines and time limits for responding to public records, and
2. Establish financial penalties paid to the requester for noncompliance, assessed daily.

Law enforcement agencies operate with a near total absence of transparency around human trafficking and prostitution sting operations, arrests, incarcerations, and convictions. We recommend that federal, state, county, and/or city entities:

3. Establish task forces to provide oversight of law enforcement agencies that perform prostitution and human trafficking operations, arrests, incarcerations, and convictions ([see #9 on page 37](#)).

Such federal, state, county and/or city task forces would be mandated to:

- a. make all meetings open to the public
- b. publish names, roles, and affiliations of task force members
- c. publish annual audits with all agency costs, including overtime pay as well as costs incurred by participating non-profits
- d. publish anonymized details of arrests and convictions, together with demographic data (gender, age, race) for the people who have been arrested and/or convicted
- e. publish all Memoranda of Understanding between task forces, law enforcement agencies, non-profits, and other agencies
- f. implement public reporting requirements for publicly-funded nonprofits and NGOs that provide services related to prostitution or human trafficking
- g. implement a grievance process requirement for nonprofits and NGOs that provide services to prostitutes or trafficking victims, in particular rape crisis centers and domestic violence shelters, including informing all clients of the grievance process in advance of rendering services

To elaborate on item g., above: Providing a grievance process baseline will empower clients to file complaints with third party organizations if services do not align with public-facing expectations and process documentation. This recommendation includes that the federal government maintain records of all such complaints and make them available to the public. A periodic review process would result in designating bad actors (nonprofits or NGOs that show consistently poor user satisfaction or engage in unacceptable practices) ineligible for public funding.

Sexual assault by law enforcement officers, including federal agents, violates the right to bodily integrity and runs afoul of the Fourteenth Amendment's Due Process Clause. It also likely constitutes an unreasonable seizure. We recommend establishing federal laws that:

4. Prohibit sexual contact by federal and state law enforcement personnel in prostitution sting operations by making it a federal crime.

This prohibition includes a recommendation that the federal government define sexual penetration, sexual assault, and other sexual contact by government agents. Identifying, defining, and prohibiting such activities from taking place in the course and scope of agents' duties would include specifying these activities as prosecutable criminal acts with restitution obtainable in civil courts. We further recommend that the relevant federal police officer standards body update its standards and training to make clear that such behavior is classified as sexual misconduct and grounds for permanent decertification⁷¹.

5. We recommend that Congress enact legislation to expand privacy laws.

Models to consider include the proposed American Data Privacy and Protection Act (ADPPA), or the European Union General Data Protection Regulation (GDPR).

Basic civil and human rights require laws that protect the digital privacy of erotic service providers. The USA has signed on to the UN Treaty on International Covenant on Civil and Political Rights, but there are many ways in which developments in surveillance have preemptively violated this community's privacy.

We expressly recommend privacy law expansions that prohibit images and other personal data from being scraped from public sites and then published in databases and other online sites without the permission of those profiled. Where law enforcement has already established a data file, we recommend a federal mandate to notify and provide records access to individuals, including but not limited to photos, with full disclosure about where the information is stored, how it is being used, and who can access the file.

Publicizing the names of those arrested creates a permanent digital footprint association and leads to discrimination in housing, employment, education, parental custody rights, and access to financial institutions and products. We further recommend the development of legislation expressly protecting the privacy of erotic service providers, clients, and support staff during undercover sting or surveillance operations. Such legislation would include prohibiting law enforcement and media publicizing names of those arrested.

ESPLER Project's 2023 report, [How the War on Sex Work Is Stripping Your Privacy Rights](#), shows how law enforcement agencies use technology to systematically and pervasively violate civil liberties and privacy rights, using the pretext of preventing human trafficking. Our policy recommendations from that report (see page 55) include:

- a. Ban commercial surveillance: The Federal Trade Commission defines commercial surveillance as "the business of collecting, analyzing, and profiting from information about people." This includes companies that sell your information to police or advertisers as well as companies that sell information about individuals online to anyone who will pay. The United States is a world leader in technology, yet we are virtually alone in our lack of protections. We recommend passing legislation at the federal level to ban commercial surveillance.
- b. Regulate police databases: Oversight and regulation are needed to redirect public safety dollars towards solving crimes against people rather than forcing sex workers to disrobe for photos of all their tattoos and building databases of sex workers – or databases of transgender people, as recently happened in Texas⁷².

71 *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 846 (1998); *Rogers v. City of Little Rock* 152 F.3d 790, 797 (8th Cir. 1998); *Martinez v. Cui*, 608 F.3d 54, 63 – 64 (1st Cir. 2010); see *Hess v. Garcia*, 72 F.4th 753, 756, 767 (7th Cir. 2023)

72 <https://cbsaustin.com/news/local/lgbtq-community-terrified-after-texas-attorney-general-sought-data-on-trans-texans>

Maintain intellectual rigor and integrity when creating legal definitions of criminalized populations: In investigations and reports, care needs to be taken that law enforcement agencies don't blur definitions, as they have with the Suspicious Activity Reporting Initiative and the FBI's gang member definition.

- c. Protect sex workers' and our clients' identities: We recommend establishing clear policies for police, prosecutors, and courts, which currently exercise free reign in publishing the names and arrests of sex workers and clients in newspapers and online. Such publication exposes us to public hostility, discrimination in housing, employment, and social media, and at times, violence.

When government bodies gaslight the public with doublespeak – such as the conflation of prostitution and terrorism – and do so for profit, at the expense of the rights and liberties of citizens, diverting public resources into policing imaginary threats, the resulting collapse of governmental integrity impacts citizens' constitutionally protected rights. Therefore, we recommend that the federal government:

6. Establish accountability and integrity laws to prevent the breakdown of intellectual rigor in policing criminalized populations.
7. Remove prostitution from the federal moral turpitude statues that are so vague as to be arbitrarily used to bar legally working sex workers (like cam workers) from entering the United States.

Prostitution arrests should never be a means to deport sex workers, sex trafficking survivors, or our clients. Therefore, we recommend that the federal government:

8. Remove prostitution as a means to deport people.

As we have outlined in this report, the criminalization of prostitution – an unconstitutional undertaking that violates body autonomy, privacy rights, worker rights, freedom of speech, and more – combines a money con with exploitation, abuse, and mind control, and is a gendered tool of oppression in the War on Women. Therefore:

9. We call for a complete overhaul of prostitution and sex trafficking training for law enforcement to ensure that policing practices respect all aspects of consensual adult sex work; and,
10. We call for a complete decriminalization of prostitution to prevent the surveillance, public stigmatization of, and discrimination against sex workers and our clients.

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ESPLER deeply appreciates the team's commitment to holding law enforcement accountable and upholding the right to privacy, bodily autonomy, and freedom from government intimidation.



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MAXINE DOOGAN is an American prostitute, social justice and politics expert and advocate, documentarian, artist, author, and media personality. For 33 years Maxine has regularly traveled across the U.S. and abroad advocating for the expanded rights and protected working conditions of sex workers. Her advocacy has successfully reformed prostitution laws in Alaska and California. Doogan is Executive Director of the ESPLER Project.

MEGAN HOBZA is a nonprofit strategy consultant of over three decades and the convener of the Nonprofit Strategy for World Builders online courses. Her work as a community-building catalyst has included founding roles in the Whole Place of Whittier and the Whittier Free Store. She is the former executive editor of hyper-local Sustainable City News in Whittier.

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