Washington Attorney General Receives Top NAAG Award and Becomes NAAG President

Wednesday, June 22 was a banner day for Washington Attorney General Rob McKenna. First, he received the Kelley-Wyman Award, the Association’s highest honor given annually to the Attorney General who has done the most to achieve NAAG objectives. Then, he took over as 2011-2012 NAAG president after being unanimously elected by NAAG membership. It all transpired during the NAAG Summer Meeting, June 20 – 22, in Chicago.

Maryland Attorney General Doug Gansler was elected president-elect, Wisconsin Attorney General J.B. Van Hollen was elected vice president, and North Carolina Attorney General Roy Cooper became immediate past president, all for a one-year term. The eight other Attorneys General serving on the NAAG executive committee as well as the NAAG committee assignments are posted on the web.

Illinois Attorney General Lisa Madigan served as host of the Summer Meeting, with its theme of “Maximizing State and Local Partnerships.” The agenda included presentations on cybercrime, search engine competition, prescription drug abuse, Supreme Court cases, and familial DNA, as well as discussions with Judge Richard Posner of the U.S. Court of Appeals and best-selling author and lawyer Scott Turow.

NAAG also welcomed the third William Sorrell Lecture Series on Tobacco Policy and Enforcement speaker, Jim Sargent, M.D., of Dartmouth Medical School, who addressed getting smoking out of movies.

Outgoing NAAG president, Attorney General Cooper, delivered his final remarks June 22 and announced that a summary of his presidential initiative summit, held April 10 – 12 in Charlotte, N.C., was now available online. The initiative theme was “America’s Financial Recovery: Protecting Consumers as We Rebuild.”

NAAG President McKenna’s one-year presidential initiative will focus on human trafficking (see presidential initiative launch event article in this issue).

IN THIS ISSUE

Giving a Voice to the Voiceless: “Pillars of Hope”  Presidential Initiative to Tackle Human Trafficking............. 3
The 2011 Supreme Court Term: The Hidden Gems............. 5
Attorneys from 10 Countries Attend  First NAGTRI International Program................................. 7
Summer Interns Join NAAG............................................. 9
As Attorney General McKenna stepped forward to receive the Kelley-Wyman Award during the June 22 State Dinner, Attorney General Cooper described Attorney General McKenna’s substantive contributions to NAAG over the years, including actively filling the Association’s most challenging leadership positions.

“Rob has distinguished himself among his peers by consistently advancing the direction, leadership and purpose of NAAG,” Attorney General Cooper said. NAAG presented a number of other special awards that same night:

- The Marvin Award, given annually to individuals who serve on the staff of state Attorneys General and who have furthered the goals of NAAG, was awarded to Jerry Coyne, deputy attorney general with the Rhode Island Attorney General’s office.

- The Laurie Loveland Award was presented to Dave Cookson, chief deputy with the Nebraska Attorney General’s office. The award recognizes individuals who have helped to advance the work of Attorneys General on tobacco-related issues.

- The National Attorneys General Training and Research Institute (NAGTRI), the research and training arm of NAAG, honored Laurie Lyte from the Maryland Attorney General’s Office and David Robinson from the California Attorney General’s Office with the NAGTRI Faculty of the Year Award. This award is given annually to faculty members who have significantly contributed to developing and presenting quality programs for their counterparts in Attorneys General offices.

- Individuals from the Alabama, Illinois, New York, Ohio, Texas, and Virginia offices of the Attorneys General were recognized for excellence in brief writing in the U.S. Supreme Court. Recipients of the Supreme Court Best Brief Awards were: Deputy Attorney General Corey Maze of Alabama; Solicitor General Michael A. Scodro and Deputy Solicitor General Jane Elinor Notz of Illinois; Solicitor General Barbara D. Underwood, Deputy Solicitor General Benjamin Gutman, Assistant Solicitor General Monica Wagner, Assistant Attorney General Michael Myers, Assistant Attorney General Morgan Costello, and Assistant Attorney General Robert Rosenthal of New York; former Solicitor General Benjamin C. Mizer, Solicitor General Alexandra T. Schimmer, Deputy Solicitor Stephen P. Carney, Deputy Solicitor Emily S. Schlesinger, and Assistant Attorney General Lori Weisman of Ohio; Solicitor General James C. Ho, Assistant Solicitor General Daniel L. Geyser, and Assistant Solicitor General James P. Sullivan of Texas; and Senior Appellate Counsel Stephen R. McCullough of Virginia.

- The Francis X. Bellotti Award, given to a former Attorney General who has served NAAG and worked diligently to further its vision and mission, was presented to former Virginia Attorney General Mary Sue Terry.

Speaker power point presentations from the Summer Meeting sessions have been posted to the NAAG web site. Video of the sessions will be posted later this month.
Giving A Voice To The Voiceless: “Pillars Of Hope” Presidential Initiative To Tackle Human Trafficking

CHRIS JOHNSON, POLICY DIRECTOR, WASHINGTON ATTORNEY GENERAL’S OFFICE AND JUDY MCKEE, NAGTRI PROGRAM MANAGER

Washington Attorney General Rob McKenna launched his NAAG presidential initiative at a June 23 kick-off meeting at the Drake Hotel in Chicago, Ill., one day after his induction as NAAG president. Focused on human trafficking, the initiative, called “Pillars of Hope,” has four main objectives to help stem this fast-growing crime: Gather more data that will track state arrests and prosecutions; raise awareness to reduce the demand; promote strong state statutes and forceful state prosecutions; and mobilize communities to increase care for victims.

North Carolina Attorney General and NAAG Immediate Past President Roy Cooper convened the meeting by commenting that the presence of a number of Attorneys General in the audience emphasized the importance of the initiative. In attendance were Connecticut Attorney General George Jepsen, Idaho Attorney General Lawrence Wasden, Maine Attorney General William Schneider, Oregon Attorney General John Kroger, Utah Attorney General Mark Shurtleff, Vermont Attorney General William Sorrell, West Virginia Attorney General Darryl McGraw, and Wisconsin Attorney General J.B. Van Hollen. Approximately 70 other state and federal officials, victim advocates, and stakeholders from across the country were also present.

Making the Case: NAAG Commitment and Overview

Attorney General McKenna began his remarks by recounting two stories from Washington regarding children who had become entrapped in sex trafficking. He reminded audience members of the statistics: that human trafficking is a $32 billion global industry and is the fastest growing and second largest criminal activity in the world, tied with arms and drug dealing. The 2010 State Department Trafficking in Persons (TIP) Report estimated that 12.3 million adults and children are trafficked across international borders.

According to UNICEF, included in that number are as many as 2 million children subjected to prostitution in the global commercial sex trade. It is estimated that 76 percent of transactions for sex with underage girls start on the Internet. He lauded the work of the Polaris Project, commenting that it is a model example of the collaboration and strategic partnerships that he has in mind as NAAG members leverage their unique “convening” powers for this initiative.

“Traffickers use modern slavery to victimize the voiceless – including millions of children – and don’t respect state, national or international borders,” McKenna said. “State attorneys general are in a unique position to rally public support for combating traffickers, while using our legal expertise to help protect the vulnerable. That’s what this initiative is about.”

Ken Thompson, senior vice-president of Lexis-Nexis, a corporation active in fighting human trafficking, moderated the panel discussion that followed Attorney General McKenna’s introductory remarks.

Holding Traffickers Accountable

In her presentation, Massachusetts Attorney General Martha Coakley noted that her state did not yet have human trafficking legislation although she was hopeful that the state Senate would soon pass a proposed bill and send it to the governor for his signature. Attorney General Coakley’s office studied several model bills in crafting the bill proposed to the legislature and determined that there were essential elements that had to be included to ensure that victims are protected and traffickers are held to account. There had to be a strong criminal aspect, appropriate definitions of labor and sex trafficking, enhanced penalties for traffickers of minor prostitutes, and strong data collection. She also noted that a separate bill has been introduced that would include a safe harbor provision for minors involved in prostitution. This bill would ensure that minors be treated as victims, not defendants, and be eligible for services from the state. Attorney General Coakley

---

1 The 2011 TIP Report, issued after the June 23 event, estimates that 27 million people were victims worldwide of human trafficking.
also emphasized the need for training of state law enforcement, prosecutors, and judges so that there is increased awareness of the signs of trafficking and an understanding of the complexities involved in prosecution.

Federal and State Partnerships

Alice Hill, senior counselor to the U.S. Department of Homeland Security (DHS) Secretary Janet Napolitano, commented on the importance of collaboration and cooperation between and among all jurisdictions in stopping the crime of human trafficking. Noting DHS Secretary Napolitano’s initiative to coalesce DHS resources to tackle this issue, Ms. Hill also emphasized the challenges, particularly in providing appropriate services for the victims of trafficking. Successful prosecution of traffickers requires the active participation of empowered victims to speak out about their abuse and trauma. Ms. Hill also noted the need for more training for first responders and pointed out that web-based training for law enforcement is available through the Federal Law Enforcement Training Center. Although there is difficulty in gathering solid statistics on the extent of human trafficking, Ms. Hill did note that one statistic showed that the cities requesting the most Continued Presence status for international victims of trafficking last year were Honolulu, New York City, Tampa, Miami, Los Angeles, Newark, San Francisco, Houston, and Chicago.

Mobilizing Communities to Care for Victims

Mary Anderson, senior advisor in the Illinois Attorney General’s Office, spoke on behalf of Attorney General Lisa Madigan. She noted that Chicago is a national hub for human trafficking and that the average age of a child entering into forced prostitution is 12. She detailed the work that Attorney General Madigan and other Attorneys General had done in successfully convincing Craigslist to remove adult sexual services from its web site. She also noted the work of Cook County District Attorney Anita Alvarez in assembling a task force of federal, state, and local law enforcement, prosecutors, and service providers to work collaboratively to identify victims and prosecute traffickers.

Illinois was also the first state in the union to pass legislation which requires law enforcement, when finding a child under 18 involved in prostitution, to notify Children and Family Services, which must, within 24 hours, initiate an abuse investigation. Attorney General Madigan successfully lobbied for the passage of a bill in the Illinois legislature that requires DNA testing of every sexual assault rape kit. Further, Illinois has worked to double the number of nurses trained in handling sexual assault victims and has partnered with the Illinois Hospital Association to incorporate training for medical personnel in identifying and treating victims of human trafficking.

Demand Deterrence and Public Awareness

Indiana Attorney General Greg Zoeller spoke passionately about the need to change the culture that makes it acceptable for men to purchase sex and to comment openly about it in bars, locker rooms, and other male-dominated spaces. Others have made the case that dignifying the word “pimp” by using it in a laudatory instead of a pejorative sense creates a culture of acceptance for the purchase and sale of human beings. Decreasing the demand for sex trafficking is essential in helping to end this crime, a crime where the victims are often under-aged children from our own communities. Attorney General Zoeller noted research has shown that men who patronize prostitutes are men from all income groups, all races, and all professions.

Part of the Pillars of Hope campaign is for elected officials to take a pledge of zero tolerance for sex trafficking, a pledge that Attorney General Zoeller is encouraging all of the state Attorneys General to sign. Although not all Attorneys General have jurisdiction to actually prosecute traffickers under their state laws, all Attorneys General can use their convening authority to draw attention to the issue, help to strengthen state laws by increasing penalties for both the traffickers and the customers of trafficking, and encourage collaborative models in victim protection and prosecution of the criminals involved. Finally, he noted that men must step up and take a leadership role in promoting zero tolerance.

Testimony from a Survivor

Shamere McKenzie, a young trafficking survivor, was the final program speaker. She emphasized the need for empowering the victims of trafficking to be survivors so they can speak out and raise public awareness and understanding. Her powerful testimony illustrated the requirement that those who join together to tackle human trafficking must emphasize a victim-centered approach so that those who have suffered so much are not further victimized by the legal and judicial system.

Leadership Council

Attorney General McKenna has established a leadership council to help him fulfill the tasks he has identified for his one-year initiative. The council consists of Attorneys General Coakley, Madigan, and Zoeller and California Attorney General Kamala Harris, Maine Attorney
General William Schneider, Michigan Attorney General Bill Schuette, New Mexico Attorney General Gary King, Oregon Attorney General John Kroger, and Texas Attorney General Greg Abbott. They will assist in fleshing out the four pillars of the initiative. Lexis-Nexis, along with the Polaris Project and Microsoft, will serve as initiative partners.

Visit the NAAG web page for more detailed information regarding the Pillars of Hope campaign.

The 2011 Supreme Court Term: The Hidden Gems

DAN SCHWEITZER, NAAG SUPREME COURT COUNSEL

This is the time of year when U.S. Supreme Court decisions are front page news. Who isn’t interested in the fate of campaign finance laws, violent video games, and global warming? And who isn’t interested in finding out what the police can do when they smell marijuana wafting out of an apartment door? But for offices of the Attorney General, some of the most important decisions are the unheralded ones — what Chief Justice Rehnquist (quoting Thomas Gray’s Elegy Written in a Country Churchyard) used to compare to “flowers which are born to blush unseen and waste their sweetness on the desert air.”

Here is a look at a few of the hidden gems of the Court’s 2011 term.

Camreta v. Greene

This case had all the makings of front page news. A father was suspected of sexually abusing his 9-year-old daughter (S.G.). Oregon child protective services and local police feared that the mother knew but stood by silently. The only witness was S.G., but the officers couldn’t get a warrant to seize her because they didn’t yet have probable cause. What to do? The answer: Go to the girl’s elementary school and interview her there (without clueing in her mother ahead of time). Alas, S.G.’s mother later filed a §1983 suit against the child protective services worker and deputy sheriff who conducted the interview, alleging that it violated S.G.’s Fourth Amendment rights. The Ninth Circuit agreed with the mother, holding that the warrantless seizure of S.G. violated the Fourth Amendment because the government officials lacked a court order, probable cause, or exigent circumstances. The Supreme Court agreed to review the case. The holding: The case was moot because S.G. was about to turn 18 and had moved across the country. There was virtually no way she would be subjected to the allegedly wrongful behavior again.

Sounds like one of those cases that portended great importance but fizzled out. A closer look tells a different story. A key fact left out of the above description was that the Ninth Circuit held that the defendant officers were entitled to qualified immunity from damages liability because the law governing this situation was not clearly established. That left Oregon officials in a bind. Although they had prevailed based on qualified immunity, the Ninth Circuit ruling established binding precedent that barred government actors from protecting suspected victims of sexual abuse by interviewing them at school. (Because the victims are usually the only witnesses to the crime, it’s very hard for officers to establish probable cause prior to those interviews. And spouses are often complicit in the crime. Interviews of the sort conducted here are therefore an important tool in combating sexual abuse of children.)

The usual rule, however, is that the prevailing party cannot appeal to a higher court.

Creating an exception to that rule, a 5-Justice majority held that the Supreme “Court generally may review a lower court’s constitutional ruling at the behest of a government official granted qualified immunity.” Camreta, slip op. 2. The Court recognized the dilemma decisions like this one impose on a government official: “He must either acquiesce in a ruling he had no opportunity to contest in this Court, or defy the views of the lower court, adhere to practices that have been declared illegal, and thus invite new suits and potential punitive damages.” Id. at 12 (internal quotation marks omitted). And the Court recognized that this dilemma is the inevitable consequence of its instruction to lower courts to decide constitutional questions before considering qualified immunity claims when that is necessary “to clarify the legal standards governing public officials.” Id. at 11. The Court therefore “exempt[ed] one special category of cases from [its] usual rule against considering prevailing parties’ petitions” — a special category of special importance to the offices of Attorney General.

Camreta’s impact extends far beyond child-interview cases or even Fourth Amendment cases generally. A state officer might lose the constitutional question but prevail on qualified immunity on any number of issues — be it the constitutionality of the Virginia Military Institute’s supper prayer, see Mellen v. Bunting, 327 F.3d 355 (4th Cir. 2003); whether a statute limiting the disclosure of information about government investigations vio-

---

lates the First Amendment, see Cooper v. Dillon, 403 F.3d 1208 (11th Cir. 2005); or whether prison officials violated a prisoner’s due process rights by failing to provide meaningful periodic reviews during his lengthy confinement in administrative segregation, see Toevs v. Reid, No. 10-1535 (11th Cir. June 20, 2011). Now, a state Attorney General’s office can seek Supreme Court review of a federal court of appeal’s constitutional holding regardless of the court’s qualified immunity holding. That is a major gain for Attorneys General offices.

Sossamon v. Texas

In this case, the Court held by a 6-2 vote that states, by accepting federal funds, do not consent to waive their sovereign immunity to suits for money damages under the Religious Land Use and Institutionalized Persons Act. That’s a nice win for the states in its own right, but my focus is on a little-noticed aspect of the Court’s decision. But first a word of background.

The Supreme Court had long held that the United States’ sovereign immunity is comparable to the states’ sovereign immunity. For example, in Tindal v. Wesley, 167 U.S. 204, 213 (1897), the Court held that “it cannot be doubted that the question whether a . . . suit is against the State . . . must depend upon the same principles that determine whether a . . . suit is against the United States.” More recently, in College Savings Bank v. Florida Prepaid Postsecondary Education Expense Board, 527 U.S. 666, 682 (1999), the Court stated that “in the context of federal sovereign immunity — obviously the closest analogy to the present case — it is well established that waivers are not implied. . . . We see no reason why the rule should be different with respect to state sovereign immunity.” This equation of federal and state sovereign immunity is helpful because some important sovereign immunity rules have been declared only in the context of federal immunity. An example is United States v. United States Fidelity & Guaranty Co., 309 U.S. 506 (1940), and United States v. Shaw, 309 U.S. 495 (1940), which held that even where a sovereign affirmatively seeks relief in federal courts, it does not waive its immunity from cross-claims and counterclaims (apart from defensive claims that seek only recoupment).

The Court muddied the waters, however, in Lapides v. Board of Regents of University System of Georgia, 535 U.S. 613 (2002). In Lapides, the state of Georgia relied on United States Fidelity & Guaranty Co. and Shaw. The Court had any number of responses, but ended up choosing a problematic one. The Court distinguished the cases as having involved the United States’ immunity, not “the Eleventh Amendment—a specific text with a history that focuses upon the States’ sovereignty vis-a-vis the Federal Government.” Lapides, 535 U.S. at 623. As I have previously written, “[t]his matter-of-fact uncoupling of states’ sovereign immunity from federal sovereign immunity is contrary to more than 100 years of Supreme Court jurisprudence.”

Thankfully, the Court in Sossamon has “re-coupled” the states’ sovereign immunity and federal sovereign immunity. In ruling for Texas, the Court relied on a case involving the United States’ immunity, Lane v. Pena, 518 U.S. 187 (1996). Sossamon, 131 S. Ct. at 1658. The Court then added an explanatory — and very helpful — footnote:

Although Lane concerned the Federal Government, the strict construction principle, which flows logically from the requirement that consent be “unequivocally expressed,” applies to the sovereign immunity of the States as well. Cf. United States v. Nordic Village, Inc., 503 U. S. 30, 37 (1992) (equating the “unequivocal expression” principle from “the Eleventh Amendment context” with the principle applicable to federal sovereign immunity); College Savings Bank v. Florida Prepaid Postsecondary Ed. Expense Bd., 527 U. S. 666, 682 (1999) (noting the “close[ ] analogy” between federal and state sovereign immunity); Belknap v. Schild, 161 U. S. 10, 18 (1896) (“A State ... is as exempt as the United States [is] from private suit”).

Id. at 1658 n.4. That language should clear up, once and for all, that states may rely on federal sovereign-immunity cases and principles in support of their own immunity claims.

Harrington v. Richter

State habeas lawyers are already familiar with Harrington v. Richter, a decision in which the Court excoriated the Ninth Circuit for failing to abide by the Antiterrorism and Effective Death Penalty Act (AEDPA) and

for failing to give sufficient deference to trial counsel under *Strickland v. Washington*. State lawyers are particularly fond of the Court’s statement that AEDPA permits a federal court to grant habeas relief under 28 U.S.C. §2254(d)(1) only “where there is no possibility that fair-minded jurists could disagree that the state court’s decision conflicts with this Court’s precedent.” 131 S. Ct. at 786. Other favorites are the statements that “even a strong case for relief does not mean the state court’s contrary conclusion was unreasonable,” and that “[i]f this standard is difficult to meet, that is because it was meant to be.” *Id.* at 786. I would like to focus on a different, less-noticed passage.

One of the major innovations of AEDPA was authorizing federal courts to grant habeas relief with respect to a legal claim addressed on the merits by the state court only if the state court’s adjudication was “contrary to, or an unreasonable application of, clearly established Federal law, as determined by the Supreme Court.” 28 U.S.C. §2254(d)(1). Thus, a federal court can no longer grant habeas relief merely because it disagrees with the state court’s legal ruling. The federal court typically has to find that the state court’s ruling was “an unreasonable application of Supreme Court precedent ─ or, in the Supreme Court’s words, “objectively unreasonable.” *Williams v. Taylor*, 529 U.S. 362, 409 (2000).

 Nonetheless, it is not uncommon for federal habeas courts to conduct an ordinary *de novo* review of the legal issue and then, after reaching a different conclusion than the state court, to add (in so many words) that “we therefore conclude that the state court’s ruling was an unreasonable application of Supreme Court precedent.” Indeed, that’s precisely what the Ninth Circuit did in *Harrington*. And the Supreme Court was having none of it.

Here it is not apparent how the Court of Appeals’ analysis would have been any different without AEDPA. The court explicitly conducted a *de novo* review, 578 F.3d, at 952; and after finding a *Strickland* violation, it declared, without further explanation, that the “state court’s decision to the contrary constituted an unreasonable application of *Strickland*.” 578 F. 3d, at 969. AEDPA demands more. Under §2254(d), a habeas court must determine what arguments or theories supported or, as here, could have supported, the state court’s decision; and then it must ask whether it is possible fair-minded jurists could disagree that those arguments or theories are inconsistent with the holding in a prior decision of this Court. The opinion of the Court of Appeals all but ignored “the only question that matters under §2254(d)(1).” *Lockyer v. Andrade*, 538 U. S. 63, 71 (2003).

131 S. Ct. at 786.

A federal habeas court must now do more than assert that the state court’s decision was objectively unreasonable; it must explain why that’s so. And that explanation must go beyond a mere repetition of the federal court’s conclusion that the state court erred. The federal court must explain why “there is no possibility that fair-minded jurists could disagree that the state court’s decision conflicts with [the Supreme] Court’s precedent.” This unheralded portion of a decision little known outside the habeas corpus field should prove very helpful to the states in the upcoming years.

Attorneys from 10 Countries Attend First NAGTRI International Program

Twenty government attorneys from 10 countries participated in the National Attorneys General Training and Research Institute’s (NAGTRI) inaugural International Fellows program, June 4 - 12. Attorneys from Bosnia, Canada, Czech Republic, Iraq, Israel, Mexico, Russia, Taiwan, Ukraine, and the United States arrived in Washington, D.C., to learn about and discuss strategies for stemming the tide of human trafficking, the fastest growing and second largest criminal enterprise internationally. Human trafficking is the focus of the one-year National Association of Attorneys General (NAAG) presidential initiative, led by Washington Attorney General and NAAG President Rob McKenna.

The program kicked off with a welcome reception at the Maryland home of Chris Toth, NAGTRI director and NAAG deputy executive director. “This program will provide a unique opportunity for the Fellows to learn from one another and develop common strategies to deal with the insidious and increasing problem of human traffick-
ing,” Toth said. “As the world shrinks, the need for sharing perspectives and increasing cooperation across borders grows.”

After the Fellows enjoyed a quick tour of Washington, D.C., they spent a full day learning about NAAG as well as hearing from some of the nations’ leading experts on human trafficking. Professor Mark Lagon, former ambassador with the Office to Monitor and Combat Trafficking in Persons at the U.S. Department of State, and currently chair for International Relations and Security Concentration for the Master of Science in Foreign Service Program at Georgetown University, was the first guest speaker. Following him was Hilary Axam, director of the Human Trafficking Prosecution Unit at the U.S. Department of Justice (DOJ), who described U.S. federal law that criminalizes human trafficking and gave some examples of the case that she and her colleagues successfully prosecuted. Samantha Vardaman from Shared Hope International and Sarah Jakiel from the Polaris Project talked about the importance of non-governmental organizations (NGOs) collaborating with law enforcement and prosecutors in tackling human trafficking. Rounding out the day, Ambassador Luis CdeBaca, with the State Department’s Office to Monitor and Combat Trafficking in Persons, passionately spoke about his experiences around the world and the leadership position that the United States has undertaken to assist other countries in combating this form of modern day slavery.

These presentations provided the foundation for the Fellows to start their group work to discuss four different aspects of human trafficking and solutions that countries might adopt to help combat the crime. Throughout the week, the individual groups met, discussed, and began to compile their recommendations on cross-border cooperation, NGO participation, model human trafficking laws, and the impediments of enforcing existing laws and how training might assist in breaching those impediments.

The Fellows had the opportunity to receive a briefing from a number of DOJ Office of Overseas Prosecutorial Development officials and met with U.S. Attorney General Eric Holder, who commended the Fellows on their dedication to fighting human trafficking. They then received a guided tour of the U.S. Capitol and met with former New Hampshire Attorney General and now U.S. Senator Kelly Ayotte. Journeying from the Capitol to the U.S. Supreme Court, the Fellows were given an overview of the U.S. judicial system by the Clerk of the Supreme Court William Suter.

On Wednesday, June 6, braving an unseasonable heat wave, the Fellows travelled to Baltimore to meet with Maryland Attorney General Doug Gansler and members of his staff who briefed them on the structure of their office and how human trafficking is being dealt with on the state level. The Fellows enjoyed a taste of American culture by attending a Baltimore Orioles baseball game at Camden Yard Stadium. Thursday, after finalizing their papers and having a brief session on management issues in public prosecutor offices, the Fellows headed to New York City where they met with the staff of the New York Attorney General’s Office. After a sobering tour of Ground Zero, they journeyed to Columbia University Law School where they presented the papers they developed throughout the week. Jim Tierney, former Maine Attorney General and director of the National State Attorneys General Program at Columbia Law School, and Anne Milgram, former New Jersey Attorney General, helped to moderate the discussion. Mr. Tierney concluded that portion of the program with a discussion on ethics for public prosecutors.

After an evening in New York City and enjoying the classic Broadway musical, “Lion King,” the Fellows returned to Washington where they participated in a graduation ceremony and closing dinner. Reviews of the inaugural International Fellows program have been overwhelmingly positive. One participant stated, “I would like to applaud the organizers for setting up a highly-interesting program as well as identifying an excellent group of participants with whom I was happy to establish warm personal as well as very productive professional relations.” Another commented, “This was a wonderful experience and I am truly grateful to have been allowed to participate in it. I am sure that it will have a significant effect on the way that I approach things, analyse things and advocate. Thank you!”

Fellows participating in the program were Tahseen Hasan Al-Chaabawi and Amir Abulkarim Al-Khiyoun from Iraq, Dalia Avramoff from Israel, Sylvia Domaradzki from British Columbia, Canada, Alma Dzaferovic, Suada Pasic and Zorica Travar from Bosnia, Nancy Hovis from Washington state, Jorge Emilio Iruegas Alvarez from Mexico, Erin Kulpa from Virginia, Abigail Kuzma from Indiana, Jeanette Manning from the District of Columbia, Denis Markov from Russia, Sonia Paquet from Quebec, Canada, Jennifer Stark from Massachusetts, Kirk Torgensen from Utah, Olena Trapeznikova from Ukraine, Asha Vaghela from New Jersey, Evelyn Yijing Wu from Taiwan, and Pavel Zeman from the Czech Republic. The program was largely funded through the NAAG Mission Foundation. Further funding came from the Alliance Partnership and the U.S. Agency for International Development (USAID).

The papers developed for this program will be made available on the NAGTRI website. NAGTRI is already beginning to plan its international program for next year.
Summer Interns Join NAAG

NAAG is pleased to welcome and host six summer interns of diverse backgrounds and interests:

**Jeffrey Brown** is working as a cyberspace law intern. Brown attended the University of Southern Mississippi for his undergraduate degree where he majored in political science and currently attends the University of Mississippi School of Law. At NAAG, Brown spends the majority of his time researching new case law and legislation related to cybercrime, writing for the cybercrime newsletter and going to conferences and related U.S. Senate and House hearings. Brown has a strong background in web design and says that is why the area of cyber law is particularly interesting to him. Brown worked for the Peace Corps in Mali teaching basic computer skills and writing a manual on how to create web sites in the developing world.

**Kyle Coppin** first heard about the internship at NAAG through a connection at the North Carolina Bar Association where he is the student representative for the International Law section. At NAAG, Coppin is focused on tobacco litigation, particularly the issues of jurisdiction related to Native Americans. Coppin says he enjoys his time at NAAG mostly because of the great hands on experience. Coppin currently attends Duke Law School and completed his undergraduate degree at American University where he majored in international relations and history. Kyle has also been lucky enough to live abroad in four countries: Italy, Spain, Switzerland and Belgium.

**Matthew Fitzharris** acquired his NAAG summer internship through the Bill Brown Scholarship from the Ohio Northern University Law School which he attends. Bill Brown, an alumnus of Ohio Northern University Law School, was the Ohio Attorney General from 1971-1983 and the school established this scholarship in his honor. At NAAG, Fitzharris splits his time researching the role of Attorney Generals in emergency management situations and assisting with both the bankruptcy newsletter as well as the consumer protection newsletter. Fitzharris completed his undergraduate degree at St. Bonaventure University where he majored in psychology and also received a master’s degree from St. Bonaventure University in business administration with a specialization in Economics. Fitzharris commented that working at NAAG has been a great opportunity to get out of the classroom and work on issues that have an impact on people.

**Kyle Petit** works as a law clerk assisting NAAG Counsel Paula Cotter with energy and environmental research and projects, and helps Judy McKee, program manager for the National Attorneys General Training and Research Institute (NAGTRI). Petit received his undergraduate degree in international relations from Boston University and currently attends George Washington University Law School. He previously worked for the D.C. Attorney General and spent last summer working for a federal judge in Albany, N.Y.

**Joe Russell** received his undergraduate degree in chemical engineering with a minor in Spanish from Brigham Young University and now attends George Washington University Law School with the intent of going into criminal prosecution. Russell worked previously as an intern for the New York State Attorney General’s of-
fice in Buffalo as well as a clerk for Buffalo City’s General Counsel. At NAAG, Russell works primarily researching human trafficking issues; an especially pertinent issue this year as recently elected NAAG President Rob McKenna has made his 2011-2012 presidential initiative to combat human trafficking.

Finally, Olivia Stitilis is NAAG’s communications intern. Stitilis is originally from Connecticut and a rising senior at American University (AU) where she majors in CLEG, an interdisciplinary major of communications, legal institutions, economics and government. She recently returned from spending her junior year abroad at the London School of Economics and Political Science. At AU, Stitilis is very involved with the School of Public Affairs Leadership Program, is a columnist at The Eagle, the AU newspaper, and works in the Career Center. She has spent the past two summers working for Teach For America as part of their operations staff in Chicago and Los Angeles, and is excited to return to the states in time to experience her first D.C. summer.

UPCOMING NAGTRI COURSES

**Deposition Skills Training for OAG-WA**
July 27 - 28, 2011
Olympia, WA
Contact: Bill Malloy, wmalloy@naag.org

**Trial Advocacy Training for OAG-NJ**
August 8 - 11, 2011
Princeton University, NJ
Contact: Bill Malloy, wmalloy@naag.org

**Moving into Management for OAG-WA**
August 23 - 24, 2011
Olympia, WA
Contact: Bill Malloy, wmalloy@naag.org

**E-Discovery Training for OAG-ME**
August 24, 2011
Maine
Contact: Hedda Litwin, hlitwin@naag.org

Winter Meeting
November 29-December 1, 2011
Grand Hyatt
San Antonio, Texas

Attorneys General and AG Staff Only