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Toby Biswas
Director of Policy, Unaccompanied Children Program
Office of Refugee Resettlement
U.S. Department of Health and Human Services
330 C Street, S.W.
Washington, D.C. 20201

Re: Unaccompanied Children Program Foundational Rule, RIN 0970-AC93

Dear Director Biswas:

I appreciate the opportunity to comment on the Office of Refugee Resettlement (“ORR”) proposed rule entitled “Unaccompanied Children Program Foundational Rule,” 88 Fed. Reg. 68,908 (Oct. 4, 2023) (the “proposed rule”).

As Nelson Mandela said, “[t]here can be no keener revelation of a society’s soul than the way in which it treats its children.” With that standard in mind, let me speak plainly—President Biden, Secretary Mayorkas, Secretary Becerra, and every other participant in the Biden Administration’s child trafficking operation should be ashamed of themselves.

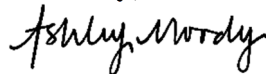
The State of Florida has been investigating the federal government’s systematic mistreatment of alien children for the last year and half, and what we discovered is shocking. Specifically, on June 17, 2022, Governor DeSantis petitioned the Florida Supreme Court to impanel a statewide grand jury to investigate, among other things, “the smuggling or endangerment of unaccompanied alien children brought into the state.” App. A at 8–9.

During the course of that investigation, which was led by my office through Florida’s Statewide Prosecutor, the grand jury issued five presentments. As the third presentment explains, “[i]f any resident of Florida exposed U.S.-born children” to the same conditions that ORR exposes alien children to, “they would be justifiably

arrested for child neglect or worse.” App. A at 28. This is because alien children supposedly in the care of ORR are being recruited into gangs, abused, and even sold into sex slavery. App. A at 48–52. Meanwhile, as ORR turns a blind eye to these horrors, Mexican drug cartels are funding multi-billion-dollar criminal operations with profits made from smuggling more and more unaccompanied aliens into the United States. App. A at 39.

While the investigation was pending, the grand jury became aware of the proposed rule. App. A at 81. The grand jury was so horrified by ORR’s proposals that it asked for its presentments to be filed as a comment on the proposed rule. App. A at 94; *see also* App. A at 81–94 (summarizing some of the grand jury’s criticisms of the proposed rule). The principal purpose of this letter is to fulfill the grand jury’s wishes. I will let the grand jury’s words speak for themselves. *See* App. A; App. B; App. C.¹ I urge you also to consider the comment filed by Florida’s Department of Children and Families, which further details the many problems with the proposed rule.

Sincerely,



Ashley Moody
Florida Attorney General

Filed on her behalf by:
/s/ James H. Percival
Chief of Staff

¹ The public docket, which contains color copies of these presentments, is available at <https://acis.flcourts.gov/portal/court/68f021c4-6a44-4735-9a76-5360b2e8af13/case/651d8f68-f322-4cd0-831f-74dc9b0d77a8>.