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To Whom It May Concern:

It would be a mistake to ban the use of facial recognition by law enforcement categorically or narrowly limit it to one technology or system. Such a step would put the citizens of Baltimore at greater risk, especially victims of human trafficking and sexual exploitation. My concern is grounded in my career of fighting against online sexual abuse of children and human trafficking. Since February 2011, I have been a Deputy Prosecuting Attorney at the Washington County Prosecutor's Office in Arkansas, where I often work to investigate crimes related to the online sexual exploitation of children. I am also the founder and Chief Executive Officer of the National Child Protection Task Force ("NCPTF"). The NCPTF is a non-profit organization with approximately 50 volunteers that includes active-duty law-enforcement officers who volunteer their time to help state, federal, and international law-enforcement agencies investigate online child abuse, recover exploited children, and hunt sexual predators and human traffickers. I have extensive experience and have undergone training that includes the National Computer Forensics Training Institute, the National White Collar Crime Center, and the FBI Cellular Analysis Survey Team, among others that includes training in the use of facial recognition technology.

Facial recognition technology is an essential tool for law enforcement agencies to bring exploited children to safety and child predators to justice; sometimes, it's the only tool. Predators constantly improve their tradecraft and share intelligence on the dark web to avoid identification, arrest, and prosecution. Millions of child rape videos and imagery currently flood the dark web, and for most of them, investigators have nothing to work with. I have seen hundreds of cases in which facial recognition technology was the only reason law enforcement could identify and rescue these children. These are not children that are as likely to come to the attention of law enforcement. We often know nothing about these children other than the fact that they are being raped and their videos and photos are being traded or sold on the dark web.

In cases like these, which are not rare, both the NCPTF and law enforcement agencies must turn to advanced facial recognition technology to generate investigative leads. While an investigator must always gather additional independent corroborating evidence before taking any further action, facial recognition technology has helped solve hundreds of child-exploitation cases this year alone. The technology helps protect children who would otherwise slip through the cracks — children who have not been reported as missing or abused but are being raped and recorded by their parents, family members, or others close to the child. It helps conserve law enforcement resources and reduces mental and emotional trauma to officers who would otherwise be forced to watch hours of footage of children being raped and sexually abused.

Limiting Baltimore City law enforcement options to use advanced facial recognition technology would put victims at greater risk and constitute a setback for the fight against child sexual exploitation and human trafficking. Concerns about the technology can be addressed by ensuring a full understanding of the limitations of the tool, thorough training, and adequate safeguards against any improper use.

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