

MEMORANDUM

TO: John Fabbriatore, Senior Advisor to the Secretary

FROM: Office of Refugee Resettlement, Administration for Children and Families

SUBJECT: Summary Report on Fraud Perpetrated by Potential and Actual Sponsors in the Unaccompanied Alien Children Program

The Office of Refugee Resettlement (ORR) in the Administration for Children and Families (ACF) has conducted an assessment of documentation fraud perpetrated by actual and potential sponsors within the Unaccompanied Alien Children (UAC) Program. As part of this assessment, and at the request of Department of Health and Human Services (HHS) leadership, the Office of the General Counsel (OGC) conducted in March and April 2025 an internal review of documentation fraud in the UAC Program.¹ The primary focus of OGC's review was potential fraud perpetrated by actual and potential sponsors, however, the review also included instances of fraud perpetrated by individuals in ORR custody (UAC or alleged UAC). This report provides ORR's evaluation and summary and certain factual information identified as a result of this work.

I. Introduction

During the Biden Administration, millions of people attempted to enter the United States illegally. In addition to adults and family units, these individuals included UACs. From 2021 to 2024 approximately 479,000 UAC were referred to ORR.² DHS OIG found that as of May 2024, more than 291,000 UAC after being released from ORR custody had not been served a Notice to Appear (NTA)³, which requires the child to appear before an immigration judge to initiate their immigration proceedings. Therefore, 60% of these children did not yet have immigration court dates and were not required to appear anywhere, reducing opportunities to verify their safety. DHS OIG also found that of those UAC who were served an NTA, 32,000 of them did not appear for their immigration court dates.⁴

It should be noted that in most cases, sponsors and family members of UAC have been active participants in alien smuggling, which is a crime under 8 U.S.C. § 1324. Family members who

¹ OGC reviewed case files accessible through the UAC Portal, the electronic case management system for UAC case-specific information.

² Referrals of Unaccompanied Alien Children by Fiscal Year, *available at* <https://acf.gov/orr/uac/referrals>.

³ U.S. Department of Homeland Security Office of Inspector General, *Final Management Alert: Management Alert – ICE Cannot Monitor All Unaccompanied Migrant Children Released from DHS and U.S. Department of Health and Human Services' Custody*, OIG-24-46 (U.S. Government, 2024), 1.

⁴ *Id.*

put their children in the hands of alien smugglers are endangering their children, in addition to taking part in a criminal conspiracy.

In March 2025, ORR uncovered a staggering backlog of 65,000 unanswered CLE reports ranging from warnings, request for services, or other red flags – submitted through the ORR call center, emails, UACs themselves and other mechanisms. These requests for help were ignored, exposing a failure of oversight and a shocking disregard for child protection.

In response, OGC assessed reports and allegations made in a selection of CLE reported fraud⁵ events. From October 1, 2023 to October 31, 2024, ORR received 1,669 reports of fraud.⁶ OGC reviewed a subset of UAC cases associated with these 1,669 reported instances of fraud, cases associated with findings in prior OGC reviews, and reports of incidents reported to the HHS Office of Trafficking in Persons. Most cases reviewed by OGC involved UACs released to sponsors during the surge but predominantly releases occurring between 2022 and 2024.

ORR's tracking of fraud trends shows that the average rate of intentional document or information fraud, regardless of the number of children assisted per month, remains at approximately 77%⁷ of reported Child Level Events (CLE).⁸ Similarly, approximately 85% of the cases OGC reviewed involved intentional document fraud.⁹ Intentional documentation fraud perpetrated by sponsors can result in ORR releasing UAC into dangerous or harmful situations. Similarly, UAC fraud, such as age fraud, enables adults to enter settings intended for the care and protection of children, thus exposing those children to unvetted adults.

Although the responsibility for fraud rests on the shoulders of the perpetrator, certain prior ORR policies created gaps that these fraudsters exploited. In 2021, ORR experienced a sharp increase in UAC referrals. ORR relaxed certain sponsor vetting policies and expedited releases of UAC. These relaxed policies often were issued through field guidance, or incorporated, in whole or in part, into ORR policy. During this period, ORR sponsor vetting policies did not require fingerprinting for all categories of sponsors, permitted sponsors to use expired forms of identification, did not universally require background checks on all adult household members, and allowed for more lenient address verification. Unscrupulous individuals abused these policies to fraudulently attempt to and actually sponsor UAC.¹⁰ In fact, in Fiscal Year 2024,

⁵ For the purposes of this document, fraud is understood as an act of intentional deception for the purpose of circumventing ORR policies.

⁶ Allegations included both direct fraud perpetrated by sponsors and fraud perpetrated by individuals in ORR custody (UACs or alleged UACs). Each reported instance of fraud was submitted to OGC within 24 hours of receiving the report.

⁷ This includes fraud perpetrated by sponsor, UAC, or individual in the country-of-origin.

⁸ A Child Level Event is an incident, event, or observation that affects the health, safety, and wellbeing of individual children and can include emergency incidents, significant incidents, behavioral notes, and historical disclosures.

⁹ OGC's review focused on cases referred by ORR from reported CLEs.

¹⁰ Beginning in February 2025, many of these policies were updated to close some of these gaps.

ORR denied less than 1% of sponsorship applications, a data point which suggests these individuals were able to sponsor UAC with little deterrence.

II. Findings

ORR fraud trend data reveals that a significant portion of reported fraud events, approximately 37%, involve intentional document or information fraud perpetrated by *sponsors*. Similar patterns were seen in the OGC review. Over half of the cases involved an element of fraudulent documentation of identity, while others involved digital manipulation of photographs, failure to disclose household members, possible fingerprinting fraud, and child welfare issues.

Further, many of the cases reviewed revealed multiple instances of fraud, e.g., age or identity fraud perpetrated by the UAC in addition to identity or address fraud perpetrated by the potential sponsor. While some cases presented isolated instances of fraud that were readily identifiable other cases revealed more intricate patterns of fraud involving multiple UAC and multiple actual or potential sponsors.

Types of fraud identified were:

- Fraudulent documentation of identity.
- Manipulated photographs.
- Address fraud.
- Fingerprint fraud.
- Failure by potential sponsors to fully disclose household members.
- UAC misrepresenting their age.

As noted above, identity fraud perpetrated by actual or potential sponsors was most prevalent. Most of the identity fraud involved the use of country-of-origin identification cards, driver's licenses, passports, or birth certificates. While all instances of identity fraud in the ORR sponsorship process are improper, some of the cases revealed particularly egregious facts. One such case involved an individual who sponsored a 15-year-old female UAC using his own identity. Subsequently, this individual sponsored and attempted to sponsor additional UAC under two different aliases and identities. This individual sexually assaulted the first 15-year-old female UAC he sponsored and is currently incarcerated. Authorities have been unable to locate the male UAC he sponsored using an alias.

Fraudulent sponsor birth certificates also were identified. In some instances, the sponsor presented either a fraudulent birth certificate or a legitimate birth certificate that did not belong

to the sponsor. In some cases, the case manager contacted the consulate or other source to verify birth certificates. However, this was not a consistent practice identified in all cases. Further, even if a consulate or other entity verified that the information in a birth certificate was accurate, the verifying entity frequently caveated that it was unable to verify the identity of the individual presenting the birth certificate.

Some sponsors submitted photographs or other evidence, including birth certificates, in attempts to establish a relationship to the UAC or to the UAC's family. In numerous cases, the photographs submitted either by the sponsor or by the UAC's family showed signs of digital manipulation. In some cases, potential sponsors were allowed to amend or modify information on birth certificates or submit different proof of relationships resulting in the release of a UAC to the sponsor.

It is important to note, however, that it was not only sponsors who perpetrated fraud. Fraud also was committed by UAC or their family members in the country of origin. ORR's fraud trend analysis shows that 40% of reported fraud events were perpetrated by the UAC or an individual in the country of origin. In numerous instances, adults posed as minors when apprehended crossing the border and were subsequently referred to ORR care, placing them in close quarters with actual children and creating an unacceptable and dangerous threat to child safety. In other instances, family members residing in the country of origin collaborated with potential sponsors to provide fraudulent information or documentation to facilitate sponsorship.

III. Conclusion

ORR data and OGC's review align in identifying that fraud, particularly fraud perpetrated by actual or potential sponsors, persists in the UAC Program. During the period from 2022 to 2024, less stringent policies allowed for potential and actual sponsors to exploit gaps in the ORR sponsor vetting process. Fraud that was identified during this review might have been prevented with policies requiring heightened scrutiny and more effective means of establishing identity of both the sponsor and the UAC. This sponsor fraud can, and in some of the instances reviewed affirmatively did, result in releasing UAC into dangerous or harmful situations.

Representative Cases

In August 2023, the Department of Health and Human Services Office of Refugee Resettlement (ORR) released a 15-year-old female Unaccompanied Alien Child (UAC) to a “sponsor” who purported to be the UAC’s biological brother, after 14 days in ORR custody. ORR requested neither fingerprints nor DNA from the purported brother. In October 2023, it was discovered that the sponsor was unrelated to the UAC and that the UAC was living in a household with multiple adult men not identified in the sponsor application. The purported sponsor raped the UAC and the UAC became pregnant. The sponsor has been charged by the state, and the case is under investigation by Homeland Security Investigations, the Federal Bureau of Investigation, and the Department of Justice. Prior to sponsoring the 15-year-old female, the purported sponsor had sponsored three UACs.

In July 2024, ORR released a 17-year-old male UAC to a purported sponsor who claimed to be the stepsister of the UAC, after 36 days in ORR custody. The purported sponsor presented Venezuelan documents, for which the federal government has no means of verifying. ORR did not request fingerprints or DNA from the purported sponsor. In October 2024, the UAC was found dead in the back seat of a car, with his genitalia exposed, along with an unconscious 30-year-old male.

In June 2024, a male UAC came into ORR custody. During his initial assessment, he reported being initiated into MS-13 at the age of 12. ORR conducted a home study and noted that the UAC’s prospective sponsor, his mother, had several gang tattoos, and that the UAC had purchased drugs during his journey to the United States. While in ORR custody for 37 days, the UAC caused bodily injury to a female UAC and a shelter staff member, and had committed 26 other incidents of disruptive, aggressive and/or abusive behavior. In August 2024, ORR released the UAC to the custody of his mother. After a week in his mother’s household, the UAC died after having been given seven marijuana joints by unrelated adult men.

In February 2024, a 9-year-old UAC was admitted into ORR custody. During the UAC’s initial assessment, she reported being inappropriately touched by her 13-year-old brother in her home country. As a result, she had nightmares and suicidal ideations. However, she wanted to be reunited with her mother, even though the abusive brother was in the household. The first ORR home study of the mother’s household revealed that the mother intended to have the UAC sleep in the same room as the abusive brother. A second ORR home study noted that there were multiple unknown individuals living in the home, that one of the rooms had a strong odor of marijuana and another room of feces, and that glass shards were lying on the floor under a broken window. The address was also noted in a previously-filed Child Protective Services report. Despite these warning signs, ORR approved the UAC to be released to the mother’s household. The current status of the UAC is unknown.