



John A. Vithoukas
County Manager

COMMONWEALTH OF VIRGINIA
COUNTY OF HENRICO

December 8, 2025

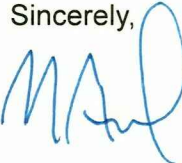
Honorable Congresswoman Nancy Mace, Chair
Honorable Congresswoman Shontel Brown, Ranking Member
Subcommittee on Cybersecurity, Information, Technology, and Government Innovation
2157 Rayburn House Office Building
Washington DC 20515

Dear Chairwoman Mace, Ranking Member Brown, and Members of the Committee:

My name is Mike Feinmel, and I currently serve as the Deputy County Manager for Public Safety for Henrico County, Virginia. I have served in this role for 3 years after 22 years as a prosecutor in the Henrico Commonwealth's Attorney's Office. In 2012, I, in tandem with Henrico Police detectives and our victim-witness coordinator, developed what we believed to be the model approach to human trafficking enforcement and prosecution: one that focused on strategies to interdict traffickers and full- scale victim response and support.

That time was the most rewarding time of my professional career. Our efforts were transformational both for the victims of the insidious trafficking industry that we served, and for me personally. I enclose a letter to the Subcommittee from Henrico Police Detective Joseph Wechsler who is, in my opinion, the national expert on the investigation and successful prosecution of human trafficking cases.

Thank you for your time and attention. Please feel free to reach out to me at fei@henrico.gov or 804-501-7580 if I can be of any assistance.

Sincerely,


Michael Y. Feinmel
Deputy County Manager

COUNTY OF HENRICO



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County Manager

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Dear Chairwoman Mace, Ranking Member Brown, and Members of the Committee:

I appreciate the opportunity to provide input as you consider cybersecurity-focused legislation to combat human trafficking. In Virginia, and specifically in Henrico County, we have seen firsthand how traffickers exploit online platforms, encrypted communications, and digital payment systems to recruit and control victims. Our experience drafting and enforcing Virginia's stand-alone commercial sex trafficking statute may offer a useful model for how federal law can better address these realities and close gaps that currently hinder effective prosecution.

Virginia was the last state in the nation to adopt a stand-alone commercial sex trafficking statute. That delay gave us a unique opportunity in 2015 to draw on years of investigative and prosecutorial experience to ensure that our law addressed specific gaps we had encountered under federal law and other states' statutes. The Henrico Police Division Vice Unit and the Deputy Commonwealth's Attorney assigned to our cases worked closely with Virginia legislators, and the bill was principally drafted by Henrico County Deputy County Manager for Public Safety, Mike Feinmel, to create a stand-alone commercial sex trafficking statute that would expand, rather than restrict, viable paths to prosecution.

What distinguishes Virginia's commercial sex trafficking law is that it creates graded offenses based on the available evidence, rather than conditioning prosecution solely on proof of "force, intimidation, or deception." In many of our cases, traffickers recruited victims, but law enforcement intervened before any commercial sex act occurred. Under prior frameworks, those scenarios often left us with no meaningful felony charge, at most, a misdemeanor, even when the trafficker's intent to exploit the victim was clear. We also anticipated "victimless" prosecutions and cases in which an undercover officer, rather than an identified victim, was recruited. In such cases, it is inherently difficult to establish traditional elements of force, intimidation, or deception.

A common pattern in sex trafficking cases involves a trafficker's promise that a victim will earn "thousands of dollars" by selling her body, when in reality the trafficker keeps all of the proceeds. Under a traditional "deception" theory, prosecution typically requires proof that the victim actually engaged in sexual acts and was then deprived of the promised proceeds. By creating a lower gradation of the offense, Virginia's statute allows prosecution based on the recruitment of a person to engage in a commercial sex act when there is proof that the recruiter intended to receive a financial benefit, even if a sex act was prevented by law enforcement intervention or never occurred. This structure closes a critical gap and enables earlier, more effective intervention against traffickers.

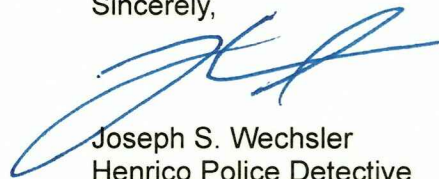
Building on this recruitment-based framework, Henrico Detective Joseph Wechsler has developed undercover investigative methods and techniques that focus on traffickers' efforts to recruit victims, often in online and digital environments, before they can gain access to a juvenile or adult victim. By targeting the recruitment phase itself, these operations allow law enforcement to disrupt trafficking activity earlier in the process while still satisfying the elements of Virginia's statute, thereby preventing harm rather than merely responding to it after exploitation has already occurred.

In parallel, Henrico County has also refined an approach to prosecution that is increasingly evidence-based, rather than dependent solely on victim testimony. In modern trafficking investigations, the vast amount of digital evidence generated by traffickers creates a detailed and often irrefutable digital footprint that can be leveraged to support a solid, evidence-driven prosecution. This includes, among other things, cell phone and other digital device evidence, digital financial records, corroborating witness statements, and historical cellular data. Taken together, these sources can independently establish recruitment, control, profit, and pattern of conduct, reducing the burden placed on traumatized victims and enabling successful prosecutions even when victims are unwilling, unable, or unsafe to testify. This evidence-centered approach is possible because of how Virginia's commercial sex trafficking statute is written and how it differs from federal law, which more narrowly ties prosecution to proof of force, fraud, or coercion.

As you evaluate potential federal legislation at the intersection of cybersecurity and human trafficking, I would respectfully urge you to consider incorporating several of the core features of Virginia's approach: graded offenses that recognize recruitment and attempted exploitation; statutory language that facilitates undercover and "victimless" operations, especially in online environments; and a framework that fully integrates digital evidence so that prosecutions do not depend solely on victim testimony. Aligning federal law with these principles would better reflect how trafficking actually occurs in the digital age and would give investigators and prosecutors the tools they need to intervene earlier, protect victims more effectively, and hold traffickers accountable.

Thank you for your attention to this issue and for your commitment to strengthening our national response to human trafficking in the cyber era. I would be glad to provide any additional information or answer questions about Virginia's experience and implementation of these strategies.

Sincerely,



Joseph S. Wechsler
Henrico Police Detective