

interpreted to require that victims of trafficking have a link or nexus to the United States to be eligible for LSC funded services. Such an interpretation will allow immigrant victims of trafficking who are *either* physically present in the U.S. *or* have experienced trafficking within the United States to be eligible for legal services from LSC-funded agencies.

This broader interpretation is also consistent with the worldwide nature of trafficking and the U.S.'s anti-abuse statutes which are meant to deter human rights abuses, such as trafficking, protect victims of such crimes and strengthen the ability of law enforcement agencies to investigate and prosecute trafficking crimes.

Both VAWA and the TVPRA have broad remedial purposes and were enacted to provide legal relief to survivors of trafficking and other abuses. *See, e.g., Lopez-Birrueta v. Holder*, 633 F.3d 1211, 1217 (9th Cir. 2011) (noting Congress's "remedial purpose in enacting VAWA"); *Matter of Armendarez-Mendez*, 24 I&N Dec. 646 (BIA 2008) (interpreting VAWA provision broadly given the statute's "overtly remedial purpose"); 22 U.S.C. § 7102 (18) (the TVPRA seeks to ensure expansive services to all victims of trafficking because "adequate services and facilities do not exist to meet victims' needs regarding health care, housing, education, and legal assistance."). Statutes with such a remedial purpose "must be liberally construed". *Voris v. Eikel*, 346 U.S. 328, 333 (1953); *see also Northeast Marine Terminal Co., Inc. v. Caputo*, 432 U.S. 249, 268 (1977) (reading civil rights statute expansively in light of its remedial purpose). Further, both statutes explicitly established LSC eligibility for survivors and allowed for expanding, and not limiting, LSC eligibility for survivors of violence. LSC's proposed rule that now requires that survivors be physically present in the Unites States to be eligible for legal representation is incompatible with the intent and goal of the VAWA and the TVPRA.

Under LSC's current interpretation, victims of trafficking who leave the United States would not be eligible for legal services unless they also qualify for a U-t

presence in the United States. By eliminating this requirement, the confusing discrepancy between