



NUTS & BOLTS OF CRIMINAL RESTITUTION

Marsh Law Firm PLLC

Restitution Agenda

Child Sex Abuse Material

Legal Remedies

Restitution Requests

Paroline Factors

AVAA Minimum



CHILD SEX ABUSE MATERIAL

Child Pornography/CSAM

- **Federal Law 18 U.S.C. 2256(8):** Any visual depiction, including any photograph, film, video, picture or computer/computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct involving a minor.
- “Sexually explicit conduct” includes vaginal and anal intercourse, oral sex, masturbation, bestiality, “sadistic or masochistic abuse,” and the “lascivious exhibition of the genitals or pubic area.”

The Six-Prong *Dost* Test

“Lascivious exhibition” is not defined by statute, but most of the federal courts that have addressed the issue applied a well-established six-prong legal standard *U.S. v. Dost*, 636 F. Supp 828 (SDCA 1986)

- Focal point of the visual depiction is on the child’s genitalia or pubic area;
- Setting of the visual depiction is sexually suggestive;
- Child is depicted in an unnatural pose, or in inappropriate attire;
- Child is fully or partially clothed, or nude;
- Suggests sexual coyness or a willingness to engage in sexual activity;
- Intended or designed to elicit a sexual response in the viewer.

CSAM Prosecution

- Child pornography is like drug crimes: production, distribution, trafficking, possession, plus facilitating, advertising, and enticing.
- Mandatory minimum sentences in the federal courts, most state courts are much more lenient.
- 2/3 of the criminal prosecutions are in state courts.
- No federal “rape” statute – child pornography prosecutions only address production of the images, not hands-on acts.
- Federal restitution for victims and state crime victim funds.
- Both federal and state civil remedies for victims.

Victim Notification

- After being identified as a victim of CSAM that is actively distributed online, a victim may elect to receive notifications in future cases.
- The victim or their guardian must file a Victim Notification Preference form via the DOJ's Victim Notification System (VNS).
- The VNS provides automatic notice and outcome information of court events.
- A parent receiving notices as a minor victim's representative has described receiving enough "notices to overflow a 55-gallon drum."

A Crime of Revictimization

- Victims of child pornography face two distinct harms.
- First, the sex abuse committed against them.
- Second, the subsequent distribution and collection of the images and videos depicting their sexual abuse.
- The circulation of a victim's child pornography is an endless invasion of privacy that is both psychologically traumatizing and emotionally unsettling for the victim and their family.



LEGAL REMEDIES

Federal CSAM Victim Remedies

- 18 U.S.C. 2259 — federal criminal remedy (restitution)
- 18 U.S.C. 3771 — Crime Victims' Rights Act of 2004
- 18 U.S.C. 3509 — Child Victims' Rights Act (privacy provisions)
- 18 U.S.C. 2255 — federal civil remedy (Masha's Law)
- 18 U.S.C. 2252A(f) — additional federal civil remedy
- 18 U.S.C. 3663(a)(3) — Victim and Witness Protection Act of 1982
- 18 U.S.C. 3663A — Mandatory Restitution to Victims of Certain Crimes

Restitution Basics Under 18 U.S.C. 2259

A “victim” is the person harmed as a result of the child pornography crime and restitution is **mandatory**.

Victim is entitled to the “full amount” of their losses which includes any costs incurred by the victim for:

- Medical services relating to physical, psychiatric, or psychological care;
- Physical and occupational therapy or rehabilitation;
- Necessary transportation, temporary housing, and child-care expenses;
- Lost income, attorneys’ fees, as well as other costs incurred;
- Any other losses suffered by the victim as a *proximate result* of the offense.

Essential Rights of Crime Victims

18 USC 3771

- Reasonable notice of public court proceedings;
- To be reasonably heard at public proceedings involving release, plea, sentencing, or any parole;
- To full and timely restitution;
- To confer with the attorney for the government;
- To proceedings free from unreasonable delay;
- To be treated with fairness and respect for their dignity.



RESTITUTION REQUESTS

Contents of Restitution Requests

Legal memorandum (include series dynamics)

Victim Impact Statement(s)

- Impact of Sexual Abuse v. Impact of Distribution

Forensic Evaluations

- Psychological evaluations
- Psychological treatment summaries
- Vocational/educational assessments
- Economic reports (pecuniary losses only)

Restitution Request Language

Under the Supreme Court's decision in *Paroline v. United States*, 134 S. Ct. 1710, 1727 (2014), JANE DOE is entitled to recover from this individual defendant restitution that is not “a token or nominal amount.”

For reasons explained below, JANE DOE respectfully requests that this court order **restitution that reflects the defendant's relative role in the causal process that underlies JANE DOE'S losses, but which is no less than \$3,000.**

Unique Harms for CSAM Victims

- Victims fear being stalked/harmed. In one instance, a child pornography offender who discovered a victim's real name used a social networking site to send the victim messages that he had enjoyed looking at her images for years, accused her of being a willing participant in her abuse, and demanded that she make a pornographic video with him.
- Greater long-term risk of depression, guilt, and poor self-esteem; feelings of inferiority; interpersonal problems; delinquency; substance abuse; suicidal thoughts; and post-traumatic stress disorder.
- As one victim stated, “[u]nlike other forms of exploitations, this one is never ending. Everyday people are trading and sharing videos of me as a little girl being raped in the most sadistic ways.”

Unique Harms for CSAM Victims

- Victims suffer from the knowledge that images/videos are being used for sexual gratification or to groom other victims. One victim explained, “I am horrified by the thought that other children will probably be abused because of my pictures. Will someone show my pictures to other kids ... then tell them what to do? Will they see me and think it’s okay for them to do the same thing?”
- Victims fear someone recognizing them. One victim explained that “[e]veryday of my life I live in constant fear that someone will see my pictures and recognize me and that I will be humiliated all over again. It hurts me to know someone is looking at them — at me — when I was just a little girl being abused for the camera.”
- Lack of control over the process of disclosure and a lack of any final resolution



PAROLINE

CSAM Doctrine — “*Save the dates*”

- **2011 – 2013** Road of Circuit Splits to the Supreme Court
- **April 23, 2014** *Paroline* Decision
- **2014 – 2018:** Lobbying for the Amy Vicky and Andy Act
- **December 7, 2018** Amy Vicky and Andy Act

Circuit	Case	Date
First	Chiradio / Kearney	July 2012 / February 2012
Second	Aumais / Lundquist	September 2011 / September 2013
Fourth	Burgess	July 2012
Fifth	Paroline / Wright	November 2012
Sixth	Gamble / Crawford	February 2013
Seventh	Laraneta	November 2012
Eighth	Fast	March 2013
Ninth	Kennedy / Cantrelle	October 2012
Tenth	Benoit	April 2013
Eleventh	McDaniel / Webb	January 2011 / September 2011
DC	Monzel	April 2011



Paroline Majority

What, if any, causal relationship or nexus between the defendant's conduct and the victim's harm or damages must the government or the victim establish in order to recover restitution under 18 U.S.C. 2259?

- Amount should not be severe;
- Amount should not be token, nominal, or trivial;
- Award should be reasonable and circumscribed;
- Victim should someday collect for all her child pornography losses;
- “Rough guideposts” with discretion and sound judgment, but no “caprice.”

A court should order restitution in an amount that comports with the defendant's relative role in the causal process that underlies the victim's general losses.

Paroline Factors

- the number of past criminal defendants found to have contributed to the victim's losses;
- reasonable predictions of the number of future offenders likely to be caught and convicted for crimes contributing to the victim's losses;
- estimates of the broader number of offenders involved (most of whom will never be convicted);
- whether the defendant reproduced or distributed images of the victim;
- whether the defendant had any connection to the initial production of the images;
- how many images of the victim the defendant possessed.

Paroline v. U.S., 572 U.S. 434, 460 (2014)

Paroline Dissent

Unfortunately, the restitution statute that Congress wrote for child pornography offenses makes it impossible to award that relief to Amy in this case.... Congress set up a restitution system sure to fail in cases like this one... [I]t would be a mistake...to lead readers to conclude that...Congress has done justice for victims of child pornography. The statute as written allows no recovery; we ought to say so, and give Congress a chance to fix it.

Disaggregation—*Whitley* (NDIL, 2019)

- A victim need not use restitution for therapy or for any specific purpose: “We compensate a victim with restitution, that is money – whether she chooses to use the money in a particular way is up to her.”
- Restitution should cover a child’s losses over her lifetime.
- Recognizes *physical health problems* and *scientific research on trauma*.
- Among many authorities cites CDC study estimating $> \$200,000$ *lifetime per victim burden of child sex abuse*.

Disaggregation—*Rothenberg* (11th Circuit 2019)

- A victim does not need to separate the harm caused by the original abuser from that of distributors and possessors; **Disaggregation is NOT required.**
- A court is not required to follow other court's decisions on restitution for a particular victim, nor must it justify why it disagrees with other another court's restitution determination. A court should affirmatively recognize the defendant's role as either producer, distributor, or possessor. Determining restitution is an "inexact science."
- A declaration from the victim's attorney is sufficient.



AMY VICKY & ANDY
ACT

AVAA Timeline to Passage

April 23, 2014 – United State Supreme Court *Paroline v. United States* decided

May 7, 2014 – Amy and Vicky Act introduced in Senate

June 26, 2014 – Amy and Vicky Act introduced in the House

July 30, 2014 – US Sentencing Commission: vast majority criminals pay zero restitution

December 31, 2014 – AVA dies at the end of the Congressional session

January 28, 2015 – AVA reintroduced in the House and Senate

February 5, 2015 – AVA clears the Senate Judiciary Committee with bipartisan support

February 11, 2015 – Senate passes the AVA 98-0

March 19, 2015 – House Judiciary Crime Subcommittee holds hearing on the AVA

December 31, 2016 – AVA dies again at the end of the Congressional session

November 16, 2017 – Amy Vicky and Andy Act Introduced in the Senate (S.B. 2152)

January 23, 2018 – Passed the Senate by Unanimous Consent

September 28, 2018 – Passed the House by Unanimous Consent

November 15, 2018 – Passed the Senate by Unanimous Consent

December 7, 2018 – Signed by the President and becomes Public Law 115-299

AMY VICKY AND ANDY ACT

- Intent of Congress that victims of child pornography be compensated by every perpetrator who contributes to their anguish.
- Restitution in “an amount that reflects the defendant’s relative role in the causal process” (*Paroline* standard) but no less than \$3000.

AMY VICKY AND ANDY ACT *cont'd*

- Defined monetary assistance of \$35,000 one-time payment for trafficking victims only (not production)
- Defendant assessments to fund + \$10 million set aside
- Victim right to evidence
- Progress report and fund report after 2 years
- Signed into law on December 7, 2018

Minimum Restitution Analysis (4 steps)

- First, determine the **“full amount”** of each victim’s losses proximately caused by the offense;
- Second, establish a baseline restitution amount for each victim;
- Third, analyze the ***Paroline factors*** (including the number of past defendants, predictions of future offender accountability, estimates of total offenders, whether the defendant reproduced or distributed images, the connection to the image production, and the number of images possessed of the victim).

Minimum Restitution Analysis *cont'd*

- Finally, consider any **additional factors** considered by other courts (including the frequency of views and shares of images, the means by which the images were acquired, any individual contribution to the market, and the nature of the victim's images).

U.S. v. Mobasseri, 2020 WL 5758007, at *2 (6th Cir. 09-28-20)

Special Thanks to Prosecutors

- AUSA Heather Hill, SDOH
 - GAL appointed, court-funded psychological assessment of the victim ordered.
- AUSA Mandy Griffith, SDCA
 - Restitution order achieved based on images found in unallocated spaces—experienced use of cache, log in data, browser history, search terms, behavioral analysis.



MECHANICS OF CIVIL LITIGATION

Marsh Law Firm PLLC

Civil Litigation Agenda

Civil Remedies

Damages

Case Law



CIVIL REMEDIES

Civil Remedies

Federal Statutory Remedies 18 U.S.C. 2255 / 18 U.S.C. 2252A(f)

- Predicate crimes (currently 14 separate provisions)

State Statutory Remedies in Florida, Kansas, Louisiana, Nebraska, Nevada, New Jersey, Oklahoma, South Dakota

Invasion of Privacy: Intrusion upon Seclusion / Intrusion into Private Affairs / Public Disclosure of Private Facts

Intentional Infliction of Emotional Distress

State R.I.C.O. remedies

Criminal Predicates Under 18 U.S.C. 2255

An actual conviction is **not** required

18 U.S.C. 2255 provides for a civil cause of action for personal injury suffered by a victim of a **violation** of the following predicate crimes:

- 18 U.S.C. 1589, 1590, 1591, 2241(c), 2242, 2243, 2251, 2251A, 2252, 2252A, 2260, 2421, 2422, or 2423

Civil Litigation Under 18 U.S.C. 2255

Federal Law Enforcement Exception to possession/distribution of CSAM does **NOT** apply to civil attorneys (nor to victims themselves)

- California state law conflict
- Adam Walsh Child Protection Act of 2006

Anticipate the needs of the civil case during criminal proceedings

Plaintiffs are not required to prove the violation “beyond a reasonable doubt”

Civil Remedies Under 18 U.S.C. 2255

The \$150,000 statutory damages clause is “liquidated damages”

Victims can elect “actual damages” **OR** \$150,000 plus the cost of the action

Includes “other litigation costs reasonably incurred” such as attorney’s fees

Specifically allows courts to award punitive damages

Civil Remedies Under 18 U.S.C. 2255 *cont'd*

Specifically allows courts to award “such other preliminary and equitable relief as the court determines to be appropriate”

Extends the statute of limitations to **10 years** after the victim turns 18

Plaintiffs have **10 years** after they reasonably discover “the violation” or “injury” to file their action

Provides for national venue & service of process



DAMAGES

Actual Damages Under 18 U.S.C. 2255

“Any person who, while a minor, was a victim of a violation of section 1589, 1590, 1591, 2241(c), 2242, 2243, 2251, 2251A, 2252, 2252A, 2260, 2421, 2422, or 2423 of this title and who suffers personal injury as a result of such violation, regardless of whether the injury occurred while such person was a minor, may sue in any appropriate United States District Court and shall recover the actual damages such person sustains **OR** [...]

Liquidated Damages Under 18 U.S.C. 2255

[...] **liquidated damages** in the amount of **\$150,000**, **AND** the **cost of the action**, including reasonable attorney's fees and other litigation costs reasonably incurred. The court may also award punitive damages and such other preliminary and equitable relief as the court determines to be appropriate.”

Assessment Techniques

- Evaluation focused on questions relevant to the harm and the standards of care
- Review of documents, images, support network members
- Interviews with victims and supportive adults
- Psychological testing of victims and caregivers
- Standardized measures and models
- Dynamic assessment of economic impact

CSAM-specific Interviews

- Supportive caregivers will likely experience vicarious trauma
- Because of the unique nature of internet pornography, structured interviews are not always advisable
- Semi-structured interviews:
 - ✓ The reason the victim is there;
 - ✓ Details about the internet child pornography;
 - ✓ Its impact generally;
 - ✓ Follow-up with specific domains of impact.

Tests and Standardized Measures

- **Psychological testing:** MMPI-A, PAI, Parental Stress Index, Projective measures, TAT, Rorschach, House-Tree-Person, Sentence Completion, etc.
- **Standardized Testing:** Child Behavior Checklist (completed by caregiver), Youth Self Report, Trauma Symptom Checklist for Children, Trauma Symptom Checklist for Young Children (completed by caregiver), Trauma Symptom Inventory

Holistic Treatment Plans

- Trauma-focused Cognitive Behavior Therapy with a supportive adult may be necessary.
- Treatment for Complex Trauma—ongoing abuse and treatment.
- These victims feel isolated in this “new” survivor experience
 - Virtual group treatment for collective trauma such as a group blog or chat, scheduled sessions orchestrated by an expert, advocacy initiatives, any other community development plans.
- Caregivers and other family members need treatment, too.



CASE LAW

Case Law

- Criminal restitution does not bar civil recovery:
Doe v. Dinkfeld, 2019 WL 3340690 (C.D. Cal. July 25, 2019)
- Plaintiff can proceed by pseudonym:
Doe v. Fowler, 2018 WL 3428150 (W.D.N.C. July 16, 2018)
- Attempted violation of a criminal predicate is valid COA:
N.S. v. Rockett, 2018 WL 6920125 (D. Or. Oct. 19, 2018)

Case Law *cont'd*

- Personal injury requirement satisfied as a matter of law;
child pornography results in de facto personal injury:
Amy v. Curtis, 2020 WL 5365979 (N.D. Cal. Sept. 8, 2020)
(extending *In re Boland*, 946 F.3d 335 (6th Cir. 2020))
- No secondary or vicarious liability by institutions in
child pornography production and hands-on cases:
Doe v. Hansen, 2018 WL 2223679 (E.D. Mo. May 15, 2018)
- No qualified immunity for state defendants:
Sims v. Labowitz, 885 F.3d 254 (4th Cir. 2018)

Case Law *cont'd*

- Plaintiff identification remains a challenge:
United States v. Denault-Reynolds, 810 F. App'x 38 (2d Cir. 2020)
- Judicial notice of criminal docket and collateral estoppel of criminal acts: *A.B. by & through Olson v. Kowalczyk*, 2020 WL 4925683 (D. Or. Aug. 21, 2020)
- Discovery can be limited: *W.L. as Next Friend of W.L. v. Zirus*, 2020 WL 836520 (W.D. Tex. Feb. 20, 2020)

Case Law *cont'd*

- Infant Compromise can be done in federal court proceeding:
Lily v. Cooper, 2020 WL 5742933 (S.D. Cal. Sept. 25, 2020)
- Non-dischargeable in bankruptcy – violations of child pornography statute are “willful and malicious injuries:”
In re Boland, 946 F.3d 335 (6th Cir. 2020)
- Attorney’s Fees:
Doe v. Jenner, 2019 WL 4051964 (M.D. Fla. Aug. 28, 2019)
- Plaintiff is entitled to post-judgment interest per 28 U.S.C. 1961

Complex Issues to Anticipate

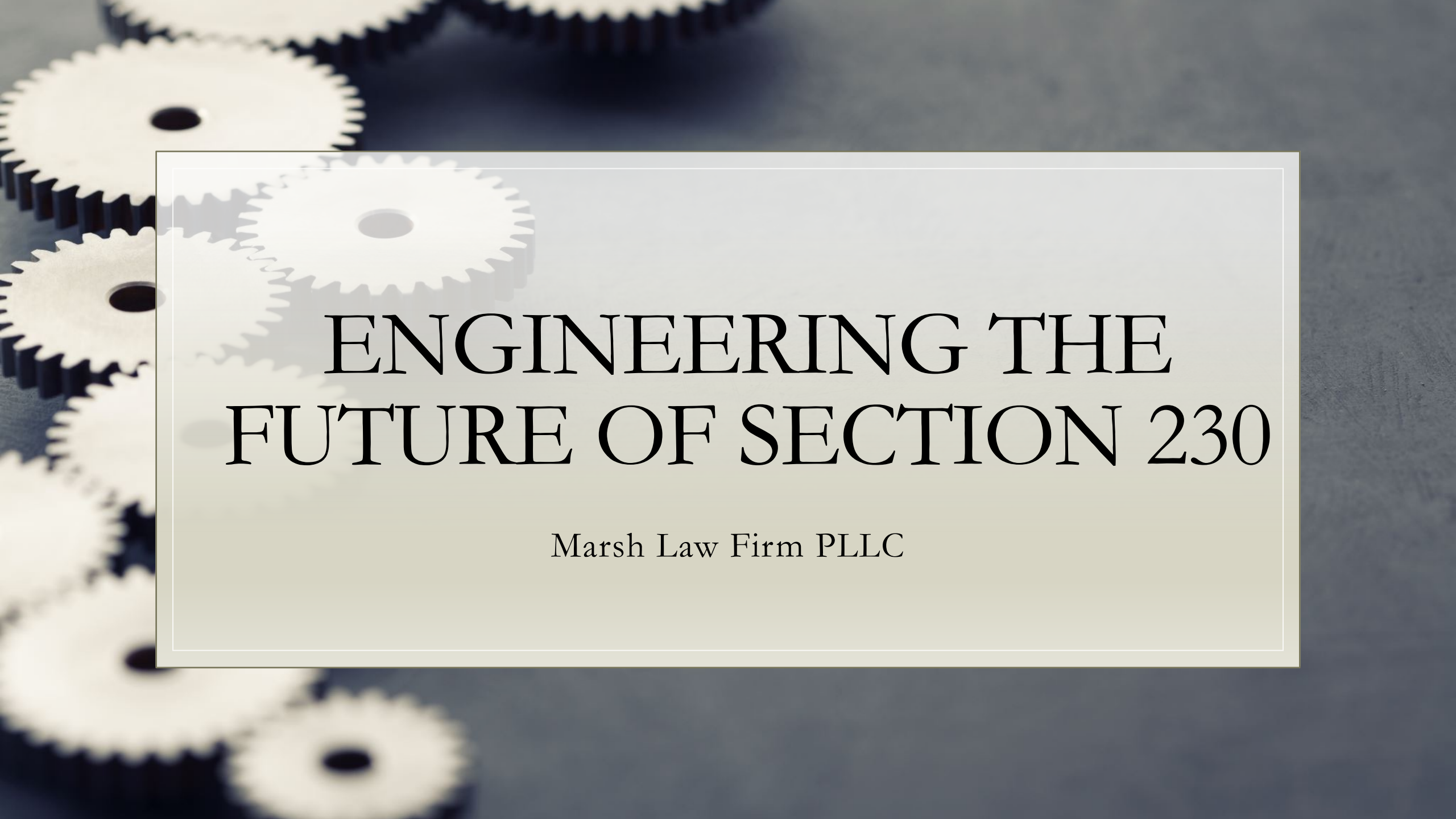
Must prove the identity of each individual victim regardless of the damages provision the plaintiff elects.

- Utilize Parents, LEPOC, NCMEC, CP3 to avoid revictimization

Relevant images/files may be in unallocated spaces.

- Creative analysis of search terms, keystrokes, browser activity, behavior

Expert evidence review will ultimately depend on the caliber of the initial criminal investigation and prosecution.



ENGINEERING THE FUTURE OF SECTION 230

Marsh Law Firm PLLC

CDA 230 Agenda

**Communications Decency
Act**

FOSTA

Earn It



CDA 230

Section 230 Immunity

Communications Decency Act of 1996

“No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider.” [47 U.S.C. 230]

Internet “Freedom” from “Censorship”

- Electronic Frontier Foundation <https://www.eff.org/>
- Council on Foreign Relations <https://www.cfr.org/>
- Center for Democracy and Technology <https://cdt.org/>
- Human Rights Watch <https://www.hrw.org/>
- Brookings <https://www.brookings.edu/>
- American Civil Liberties Union <https://www.aclu.org/>
- New America Foundation <https://www.newamerica.org/oti/>
- Americans for Prosperity <https://americansforprosperity.org/>
- Information Technology & Innovation Foundation <https://itif.org/>



FOSTA-SESTA

FOSTA

Allow States and Victims to Fight Online Sex Trafficking Act of 2018

Added **18 U.S.C. 2421A** – Promotion or facilitation of prostitution and reckless disregard of sex trafficking

Civil liability under Section 2421A only attaches when an ISP engages in an “aggravated violation” by

- 1) promoting or facilitating the prostitution of 5 or more persons; or
- 2) acting in *reckless disregard* of the fact that such conduct contributed to sex trafficking in violation of **18 U.S.C. 1591(a)**

Any person injured by reason of a violation of this section may recover damages and reasonable attorneys’ fees in an action before any appropriate United States district court.

In addition to any other civil or criminal penalties authorized by law, the court shall order restitution for any violation of subsection (2) in the “full amount of the victim’s losses” which means all losses suffered by the victim as a proximate result of the offense.

18 U.S.C. 1595 Civil Remedy

- Specific Exemption to Section 230 [47 U.S.C. 230(e)(5)(A)]
- Exemption only applies to a violation of 18 U.S.C. 1591 – Sex trafficking of children
- Also a criminal predicate for Masha’s Law but does NOT enjoy the Section 230 exemption (yet!)
- An individual who is a victim of a violation of this chapter may bring a civil action against the perpetrator (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter) in an appropriate district court of the United States and may recover damages and reasonable attorneys fees (including punitive damages).
- Any civil action shall be stayed during the pendency of any criminal action.
- “Criminal action” includes investigation and prosecution and is pending until final adjudication in the trial court.
- SOL is 10 years after the cause of action arose or 10 years after the victim reaches 18 years of age.
- A state attorney general as *parens patriae* may bring a civil action “to obtain appropriate relief.”

18 U.S.C. 1591 Criminal Predicate

Requires a party to “knowingly”

- “recruit, entice, harbor, transport, provide, obtain, **advertise**, maintain, patronize, solicit” OR
- “benefit, financially or by receiving anything of value, from *participation in a venture* which has engaged in an act...”

knowing, or, except where the act constituting the violation of paragraph (1) is **advertising**, in reckless disregard of the fact, that means of force, threats of force, **fraud**, coercion described in subsection (e)(2)...or that the person has not attained the age of 18 years and will be caused to engage in a *commercial sex act*.

The term “*commercial sex act*” means any sex act, on account of which anything of value is given to or received by any person.

The term “*participation in a venture*” means knowingly assisting, supporting, or facilitating a violation.



EARN IT ACT 2022

Earn It Act 2020 – S.3398

Original EARN IT introduced March 5, 2020 (112 pages)

- Commission creates best practices over multi-year process with multiple vetoes
- ISP safe harbor via certified compliance with the standards
- Extremely convoluted non-regulation ‘regulation’

Earn It Act 2022 – S.3538

- **Revised EARN IT introduced January 31, 2022 (53 pages)**
- **Passed Judiciary Committee February 10, 2022**
 - Commission creates best practices
 - Exempts Masha's Law from Section 230 for predicates under 18 U.S.C. 2252 / 2252A
 - [BILLS-117s3538is.pdf \(congress.gov\)](#)

The EARN IT Act Will:

- Update federal statutes to use the term CSAM instead of child pornography. The term child pornography fails to describe the true nature of the videos and images and undermines the seriousness of the abuse.
- Remove immunity for social media and technology companies that knowingly facilitate or profit from the distribution of CSAM on their platforms.
- Establish a commission of survivors, technology representatives, and government stakeholders to create recommendations and voluntary best practices for tech companies to respond to the global pandemic of online sexual exploitation of children.

EARN IT Act 2022

- Child sexual abuse material is crime scene evidence.
- If we are not a part of creating the solution, then we are part of the problem.
- The EARN IT Act is a critical step and we thank Sen. Blumenthal, Sen. Graham, Rep. Garcia, and Rep. Wagner for their leadership.

37:10



What is trauma and how does it manifest in CSA survivors?

- a. How trauma is created in sex abuse survivors
 - i. How victims process and remember traumatic events
- b. What are the short-term and long-term manifestations of trauma
 - i. Short-term narratives, amnesia, and blackouts
 - ii. Long-term memories, flashbacks, and memory gaps
- c. Client disclosures
 - i. Why delayed disclosure is common and expected
- d. Harm and damages from trauma
 - i. Lifelong process
 - ii. Living with trauma v. 'moving on'

What does it mean to be trauma informed?

- a. Interviewing the CSA survivor
 - i. Awareness of triggers
 - ii. Understanding the trauma narrative
 - iii. Best practices to keep survivors present
- b. Practical challenges when dealing with clients who are survivors
 - i. Survivor triggers impact client interaction
- c. Preparing your client for the legal system
 - i. Educating the client, the court, defense counsel, and mediators
 - ii. Understanding client barriers to litigation processes
 - iii. Challenges caused by dissociation and memory

How to translate trauma to the legal realm:

- How to represent your client in court
 - i. Pseudonym motions
 - ii. Motion for protective order
 - iii. Confidential settlement agreements
 - iv. Interplay with criminal cases
 - v. Discovery rule
 - vi. SOL reform
 - vii. What does the client want?

How to translate trauma to the legal realm:

-Common sequelae from trauma

- i. Distinguishing psychological injury from psychiatric illness
- ii. Use and misuse of the DSM
- iii. Degree of functional impairment
- iv. PTSD
- v. Pain and Suffering
- vi. Emotional Distress
- vii. Depression, Anxiety and Other Painful Emotions
- viii. Exacerbation of Preexisting Mental Disorder
- ix. Long term physical health consequences
- x. Long term mental health consequences
- xi. Emerging issues like moral harm and institutional betrayal

Vicarious Trauma & Trauma Training

- Not the same as Burnout!
- The antidote isn't a reset, it requires a restructure
- Relax, breathe deep, track your sleep
- [Dr. Juna — mindbodyspace](#)



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