



**National Lead Development Center (NLDC)
Use of Facial Recognition**

NLDC will use facial recognition services in furtherance of ongoing investigations on an ad-hoc basis to identify potential matches to an unknown person. NLDC will utilize this law enforcement tool to identify subjects engaged in financial fraud schemes or in identity and benefit fraud including members of transnational organized crime.

The approval process required for requesting or conducting the use of facial recognition technology requires supervisor approval.

NLDC will submit probe photos for the purposes of establishing investigative leads. Leads are information with varying levels of credibility and will never alone be used to establish probable cause, determine wrongdoing, or deny a benefit. All leads must be further investigated by the HSI special agent receiving the lead prior to ICE taking any enforcement action against an individual.

NLDC can submit any photo obtained through the routine course of an investigation, (b)(7)(E)

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Prior to submitting an image NLDC will use reasonable means to identify an individual through traditional investigative methods. This means the agent will endeavor to identify the individual through government database searches, open source searches, and traditional investigative techniques prior to submitting a probe photo. The agent's statement on the inadequacy of traditional processes will be noted in ICM as an ROI.

NLDC may crop, rotate, or resize an image prior to submitting the image to ensure the subject face is the focal point.

The HSI agent or analyst will compare information returned to other information in ICE and governmental databases to determine if candidate matches and are supported by corroborating evidence. This process is known as "vetting." If a candidate returned is successfully vetted, the HSI agent or analyst will work up a lead for further investigation. Any lead related to a case is entered into ICM as an ROI.

Candidate lists will be maintained in an investigative case file as required under the federal rules of evidence, but non-vetted candidate information will not be used for leads or entered in an ROI in ICE systems. At no time will a candidate return be used as evidence, probable cause, or proof of wrongdoing. A vetted candidate match is considered the first step in HSI's identification process. The matched return will be treated with the same weight and in the same manner as an investigative lead or tip, which all require follow up from investigators before ICE can take any enforcement action against an individual.