



March 27, 2024

Committee on Rules of Practice and Procedure  
Administrative Office of the United States Courts  
One Columbus Circle, NE  
Washington, DC 20544  
[RulesCommittee\\_Secretary@ao.uscourts.gov](mailto:RulesCommittee_Secretary@ao.uscourts.gov)

**Re: DOJ Proposed Fed. R. Crim P. 49.1(a)(3) and Fed. R. Civ P. 5.2(a)**

The American Association for Justice (AAJ) and the National Crime Victim's Bar Association (NCVBA) are voluntary bar associations whose members represent victims injured by sex abuse, trafficking, and violence. The AAJ and NCVBA support the proposed rules amendments from the U.S. Department of Justice requiring that all publicly available court filings refer to minors by pseudonyms instead of initials and encourage the Advisory Committees to undertake this rulemaking in conjunction with other important privacy protections already under evaluation involving the elimination of partial social-security numbers as identifiers.

In addition, the AAJ and NCVBA strongly urge the Advisory Committees to consider the use of gender-neutral pseudonyms and pronouns as an important safety protection for minors escaping unfathomable abuse and violence. While the use of a pseudonym is clearly preferable over a minor's initials, the use of gender, especially when combined with the identification of adults by name or initials around the minor, makes the true identity of minors easier to uncover.

Our organizations encourage the advisory committees to move forward with DOJ's proposals. If we can be of further assistance or provide additional information about how best to protect victims, please contact Sue Steinman, Senior Director of Policy and Senior Counsel at AAJ ([susan.steinman@justice.org](mailto:susan.steinman@justice.org)) or Renee Williams, Executive Director at NCVBA ([rwilliams@victimsofcrime.org](mailto:rwilliams@victimsofcrime.org)).

Sincerely,

Sean Domnick  
President  
American Association for Justice

Michael Pfau  
President  
National Crime Victims Bar Association