

**OFFICE OF ATTORNEY GENERAL  
ANDREA JOY CAMPBELL  
STRATEGIC PLAN  
2023 - 2027**



# Our Mission

The Office of the Massachusetts Attorney General is the best public law firm in the country. It has a long and proud history of serving the people of the Commonwealth by providing first-rate legal services, strong defense of our nation-leading laws, and high-impact advocacy that improves the lives and livelihoods of Commonwealth residents.

Building upon this legacy, the Office of Attorney General Andrea Joy Campbell is focused on making government work better and more fairly for everyone, expanding public health and safety for all, creating opportunities for economic mobility, and ensuring justice for all.

# Values

- **Equity.** We work tirelessly to address inequities, to protect and advance civil rights, and to combat discrimination in all its forms, with a focus on expanding opportunities for communities marginalized by structural racism and poverty.
- **Integrity.** We adhere to the highest standards of ethical behavior as public servants, mindful that we must work to earn trust and inspire confidence.
- **Accountability.** We are committed to open and honest communication, data-driven decision making, and holding ourselves accountable for the values and goals identified in this plan.
- **Dignity.** We represent the public, and treat the people of Massachusetts with respect, care, and compassion, regardless of race, ethnicity, national origin, religion, age, sexual orientation, gender identity, disability, socioeconomic status, immigration status, veteran status, or criminal history.
- **Community.** We believe in meeting people where they are, listening and learning with humility, and striving to help people in every part of the Commonwealth to pursue their potential and purpose.
- **Excellence.** As the People’s Law Firm, we work hard every day to provide the highest level of service to the people of the Commonwealth and to responsibly protect taxpayer resources.
- **Connection.** We believe our work and our results must be responsive to the people and communities we serve.

# About the Plan

This plan sets forth five strategic goals that will guide our work through 2027.

Overall, the Attorney General’s Office (AGO) will meet the challenges of the present, while being prepared to adapt to unanticipated events in the future.

Across all **five strategic goals**, the AGO will use all of the tools of the office to maximize the impact of the AGO for the people of Massachusetts through work across the state and nationally.



# A NOTE FROM



## ATTORNEY GENERAL CAMPBELL

**Massachusetts is the greatest state in the nation**, with so much potential and promise. Yet we all don't have the same opportunity—to earn a livable wage, live in an affordable home, access high quality health care and education, and build wealth. The cost of living in many parts of the state is too high, our economic potential is too often realized by too few, and our kids face an unprecedented climate crisis and an uncertain future.

I have heard from every part of the Commonwealth that people want true opportunity and choice to define and reach their own potential and promise, so that economics and life circumstance don't determine the trajectory of a person's life. By focusing on creating economic opportunity, strengthening public health and safety, and focusing our work on those who are too often left out and left behind, particularly our youth and our elders, we have heeded the call.

What follows is a plan that lays out my vision to expand opportunity and choice for everyone. It is organized around five strategic goals:

- Advance economic opportunity and consumer justice for all;
- Protect and promote public health and safety throughout our state, with particular attention to closing gaps in healthcare access and environmental health;
- Protect and strengthen the health, safety, and well-being of our youth;
- Defend and embody the good of Massachusetts government, while holding the powerful to account, particular those who misuse roles of authority or public trust; and,
- Expand the reach of the AGO and make sure that our legal and advocacy work is informed by and reflects the needs of communities and residents in every part of the state.

This plan also includes strategies to advance each of these five goals, and a commitment to report on our progress and to use an equity lens across our work. Taken together, this plan will guide the actions of our office and will ensure that we meet this moment and the challenges ahead with urgency, fortitude, and grace.

This plan shines a spotlight on just how much the People's Law Firm and our incomparable staff can accomplish for Massachusetts. I am proud of the vision and goals set out in it. But make no mistake: achieving our objectives will not be easy. We can achieve them, though, because every day the extraordinary lawyers and staff of this office will continue to devote their boundless talent to serving residents of this great state day in and day out. I am grateful for them, the work they've done, and work they will do in the months and years ahead.

We look forward to working in partnership with you.

A handwritten signature in black ink, appearing to read 'AJC'.

Andrea Joy Campbell  
Massachusetts Attorney General



# Organizational Structure & Tools

The Office of Attorney General Andrea Joy Campbell, building upon the strong foundation of those who came before, will be an even more inclusive workplace that centers equity and fairness, prioritizes the well-being of its employees, and lifts up the work of each and every staff member.

The AGO is organized into six bureaus: **the Criminal Bureau, the Energy & Environment Bureau, the Executive Bureau, the Government Bureau, the Health Care & Fair Competition Bureau, and the Public Protection & Advocacy Bureau.** Each Bureau has deep subject matter expertise and leadership who are among the most dedicated, passionate, and brilliant public servants in the country.

To advance our strategic goals, the AGO will use all of the office's tools to protect the rights and advance the interests of the Commonwealth and its residents, including:

## Enforcement & Litigation

As the Commonwealth's Chief Law Officer, the Attorney General has the legal authority to enforce the laws of the Commonwealth to protect its environment and our residents, whether as consumers, patients, students, workers, voters, ratepayers, or simply as residents of our state. The AGO's legal and litigation tools include:

- Investigating wrongdoing, filing civil lawsuits, and engaging in other advocacy, including through consumer mediation services, to advance the public interest in our local communities; and nationally, by collaborating with other states to advance the Commonwealth's interests in matters of national significance;
- Issuing guidance, advisories, and enforcement notices to state clearly the AGO's interpretation of the law in particular legal areas;
- Providing counsel to and defending the Commonwealth and its agencies in courts;
- Pursuing criminal prosecution where appropriate, particularly in cases involving fentanyl, firearms, human trafficking, gaming, white collar crime, public corruption, insurance and Medicaid fraud, and environmental crimes, while simultaneously supporting law enforcement, and ensuring that the AGO's prosecutorial practices are fair and equitable and advance justice equally for all communities across the Commonwealth; and
- Advocating for consumer-friendly utility rates and auto insurance premiums by representing consumers' interests before state regulatory agencies.

## Policy & Legislative Advocacy

In addition to our litigation tools, the AGO helps shape state law and policy, and has a dedicated Policy and Government Affairs Division that develops, supports, and advances the office's policy and legislative priorities, including articulating the office's position on legislation under consideration in both the Massachusetts Legislature and the United States Congress. The AGO's role in policy and advocacy can take many forms, including helping to develop legislation, informally advising policymakers, testifying in support of legislation, participating in public advocacy events, promulgating regulations where authorized to do so, authoring comment letters to administrative agencies, and maintaining open lines of communication with our local, state, and federal partners.

## Community Outreach, Education & Assistance

Through the Community Engagement Division (CED), the AGO works to establish a bridge between community members and the AGO to ensure that every resident has access to AGO resources, services, and educational materials. CED creates formal and informal engagement structures for the community to interact with the office and provides and facilitates trainings, informational sessions, office hours, convenings, and presentations on a wide variety of topics.

As the People's Law Firm, the AGO is committed to community-driven advocacy, and being accessible and accountable to the public. The AGO has four offices located in Boston, Worcester, Springfield, and New Bedford with goals of ensuring all parts of the Commonwealth have and feel an AGO presence. In addition to expanding the reach of the office, the AGO has several public-facing divisions and initiatives focused on providing education and consumer assistance to residents including working with individual consumers to resolve complaints against businesses. The AGO administers several hotlines and an online portal where complaints can be filed. We routinely provide residents with information, assistance, and mediation services provided by specialized staff working in divisions across the AGO and by local consumer program partners.



# Grants Management

The AGO operates as both a grantor and a grantee. As a grantor, the AGO administers competitive grant programs statewide that are funded, in part, by the AGO's enforcement work. These programs return millions of dollars to local communities each year to support a wide range of initiatives, including substance use prevention and treatment programs, summer youth employment opportunities, local consumer assistance programs, a residential energy assistance program, and a neighborhood renewal fund.

As a grantee, the AGO also applies for funding to develop, support, and expand AGO activities. For example, the office has historically received federal funding from the Department of Justice to support violence prevention programs, anti-heroin trafficking policing efforts, services to prevent human trafficking, and victim services and compensation programs.





# Impact & Annual Reporting

The AGO will report annually on the office's impact and progress toward meeting our goals. The report will include:

- **Monetary impact for residents** – the AGO will report on how it has helped residents recover and save money through litigation, restitution, mediation, or settlement, as well as the savings afforded consumers through the AGO's various advocacy tools, including for example, student debt relief, utility savings, and foreclosure prevention work.
- **Monetary impact for the Commonwealth** – the AGO returns at least 80% of what it receives in its annual budget to the General Fund in the form of settlements, penalties, judgments, and charity and fundraiser filing fees each year. Accounting for annual contributions from multi-year settlements including the Opioid Recovery and Remediation Fund, as well as the Tobacco Master Settlement Agreement, the AGO brings in far more than it spends. The AGO will report on how these resources support the Commonwealth's General Fund and other important statewide work.
- **Litigation** – the AGO will provide an update on the status of key litigation that aligns with the AGO's strategic goals, with the understanding that litigation can take place over a period of years and across multiple bureaus and divisions within the AGO.
- **Policy and advocacy work** – the AGO will report on policy and legislation that the Attorney General has supported that aligns with the AGO's strategic goals and how those efforts will have an impact on Massachusetts residents and communities.
- **Community outreach and community voice** – the AGO will report on the office's success in expanding outreach to and engagement with marginalized communities and communities that feel left out and left behind, including the AGO's efforts in resourcing and expanding our regional offices and AGO footprint, developing new partnerships, and providing trainings, convenings, and other events across the Commonwealth.
- **Reach and impact of grant making activities** – the AGO will report on the impact of our grant funded programs, with particular attention to gauging the success of efforts to broaden awareness of and access to our grant funding programs in communities that have historically received fewer grants.

# Strategic Plan: Overview

## Goal 1: Advance economic opportunity and consumer justice for all

- **1.1:** Protect people from exploitation, and unfair and deceptive business practices, especially low-income communities where such practices historically have been targeted
- **1.2:** Address discrimination and inequity in the housing market and expand access to safe, affordable housing and homeownership
- **1.3:** Ensure that workers are treated justly and have access to fair pay and benefits, and to safe working conditions
- **1.4:** Expand access to wealth building opportunities for all, with a focus on closing the racial wealth gap

## Goal 2: Protect and promote public health and safety throughout our state, with particular attention to closing gaps in health care access and environmental health

- **2.1:** Be a state and national leader on gun violence prevention and champion common sense gun laws
- **2.2:** Prioritize access to health care, including mental health care, and work to reduce disparities in social determinants of health and health outcomes
- **2.3:** Be a national leader in protecting reproductive rights and gender affirming care
- **2.4:** Use every tool of the office to achieve environmental and climate justice and promote fair and affordable decarbonization with the urgency required to meet the existential threat of climate change
- **2.5:** Continue cutting edge work to address the opioid and drug crisis and support communities and families impacted by that crisis
- **2.6:** Advance the rights of elderly people to live with dignity and remain in their communities free from abuse, neglect, and exploitation
- **2.7:** Continue to support and advocate for crime victims and survivors



**Goal 3: Protect and strengthen the health, safety, and well-being of our youth**

- **3.1:** Tackle the youth mental health crisis and its root causes, including harmful products, bullying, hate, and harassment
- **3.2:** Address the cradle-to-prison pipeline by engaging at the intersection of education and juvenile justice
- **3.3** Work to break down barriers that impede access to a high-quality education and equal educational opportunities for students of color, low-income students, immigrant students, students with disabilities, LGBTQ+ students, and other marginalized student populations
- **3.4:** Promote safe and healthy employment opportunities for youth, and hold accountable those who violate child labor laws

**Goal 4: Defend and embody the good of Massachusetts government, while holding the powerful to account, particularly those who misuse roles of authority or public trust**

- **4.1:** Defend our nation-leading consumer protection, employment, civil rights, environmental, and gun safety laws against challenges from special interests
- **4.2:** Prioritize accountability of those who hold positions of authority or public trust for abuses of power or misuse of public funds
- **4.3:** Support law enforcement partners who earn the trust of their communities, and hold accountable those who engage in biased policing
- **4.4:** Ensure fair and just criminal prosecutions, advocate for the humane treatment of incarcerated people, and support successful re-entry for those who have served their time
- **4.5:** Protect voting rights and election integrity in Massachusetts and nationally

**Goal 5: Expand the reach of the AGO and make sure that our legal and advocacy work is informed by and reflects the needs of the communities and residents in every part of our state**

- **5.1:** Leverage regional offices, public awareness initiatives, grant programs and staff to reach more communities and establish a greater AGO presence across the Commonwealth, especially in communities of color and rural communities
- **5.2:** Ensure appropriate linguistic and cultural capabilities and accessible modalities to reach all of our diverse communities across the Commonwealth
- **5.3:** Engage and be guided by communities affected by the work of the office

# Key Investments

The AGO has prioritized several key investments required to execute this strategic plan:

- ***Invest in the recruitment, retention, development, and well-being of a diverse and talented workforce.*** The office deeply values the extraordinary talent and dedication of its employees, and we know that successful representation of the public requires retaining that talent and recruiting additional talent. Accordingly, we will prioritize, and continue to advocate for, increased salaries for these public employees to ensure their salaries are comparable to other state employees. In addition, we will continue to invest in diversity, equity, and inclusion work and building a culture where all staff can thrive, and double-down on the AGO’s efforts to develop pipelines, including by expanding the AGO’s Fellowship Program, now named the “Lovell Honors Program,” to recognize the extraordinary leadership of former First Assistant Stephanie Lovell, the first black woman to serve as First Assistant in the AGO.
- ***Make key capacity investments to support this plan.*** To support the plan’s implementation, the office has made several key hires, including creating and hiring a Senior Advisor for Economic Mobility and Opportunity and a Senior Legal Advisor, and will make several additional hires to add depth to the litigation capabilities of the office, to expand the reach of the regional offices, to build out the grants management function, and to add further subject matter expertise in key areas. The office has also identified the importance of more robust data collection and analysis to drive decision-making, enhance enforcement work, and track the impact of the office’s work especially on marginalized communities.
- ***Launch four new dedicated units.*** These units are the Reproductive Justice Unit, the Elder Justice Unit, the Gun Violence Prevention Unit, and the Police Accountability Unit.
- ***Enhance community engagement.*** The AG will work to expand ways that residents can connect with the office to ensure that community voices from all over the state can help guide, shape, and inform the work of AGO, including on the key strategic goals at the heart of this plan.

The office will continue to monitor the internal investments required to ensure the successful implementation of this plan.

# Strategic Goals & Objectives

## Goal 1: Advance economic opportunity and consumer justice for all

The AGO will continue to address discrimination and inequities in the marketplace, including the housing, labor, and financial services markets. The foundation of this work is the AGO's belief in economic dignity for all persons: every person in the Commonwealth should be able to care for themselves and their families, pursue their purpose and potential, and be treated with respect at work and as a participant in the economy.



**Objective 1.1:** The AGO is committed to building upon its proud consumer justice legacy by working to eradicate unfair, deceptive, and discriminatory business practices that prevent marginalized communities from accessing the same economic and financial benefits as other residents, including for example, by:

- Combating predatory lending, including student, medical, and auto debt, and harmful debt collection practices
- Comprehensively supporting student loan borrowers, including through enforcement actions against for-profit education scams, direct assistance for borrowers to access federal relief, and federal advocacy for policies like broad-based loan cancellation
- Ensuring that access to credit, and credit reporting, meets the demanding standards set by state law
- Addressing fringe financial products and tactics, including payday lending, exploitative check cashing, rent-to-own schemes, and equity skimming products
- Ending junk fees and drip pricing
- Obtaining restitution for MassHealth members who are improperly charged cash for services covered by Medicaid, including Suboxone
- Tackling discrimination and unfairness when companies use algorithms and artificial intelligence in their business practices
- Ensuring that auto insurance companies' pricing is affordable and nondiscriminatory
- Holding accountable businesses that engage in fraud or other tactics designed to prevent or reduce competition in the marketplace, which harms consumers and businesses alike
- Tackling the so-called competitive electric supply industry, which has cost Massachusetts consumers \$525 million dollars over the past six years
- Advocating for consumer-friendly residential utility rates at the Department of Public Utilities
- Continuing to ensure that public charities raise and spend charitable dollars appropriately
- Engaging in robust prevention efforts by providing know-your-rights and other trainings, and by supporting the work of Local Consumer Programs (LCPs), which are nonprofit agencies that handle consumer complaints in their own regions of the state

**Objective 1.2: Address discrimination and inequity in the housing market and expand access to safe, affordable housing and homeownership**

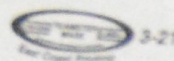
Access to safe, affordable, and stable housing is essential to health, well-being, and wealth building. We will expand the AGO's work in this area because that is what the growing housing crisis in the Commonwealth demands. In particular, the AGO will pursue work designed to:

- Combat discrimination on the basis of race, source of income, familial status, and disability against both renters and homebuyers, including by tackling appraisal discrimination, digital redlining, and other forms of algorithmic discrimination
- Address exclusionary zoning, including by ensuring compliance with the MBTA Communities law
- Tackle substandard housing conditions and environmental hazards, because we know that asthma and other respiratory conditions are exacerbated by poor housing conditions
- Hold accountable housing providers for unlawful foreclosures and evictions
- Work to reduce disparities in the mortgage markets by addressing discrimination, mortgage deserts, and predatory lending
- Combat equity skimming schemes, unlawful leaseback arrangements, and the use of predatory liens
- Support and expand access to affordable housing and homeownership opportunities, including through the Neighborhood Renewal Division's use of the state sanitary code to turn around abandoned residential properties
- Continue to fund the Residential Energy Assistance Grant Program to assist low- and moderate-income customers with paying their bills
- Provide residents with reliable and easily accessible information about their rights in the housing market, including information about residential health hazards, civil rights, and other legal protections and resources





**WAGE THEFT**  
AND HOLD EMPLOYERS ACCOUNTABLE





**Objective 1.3: Ensure that workers are treated fairly and have access to equitable pay and benefits, and to safe working conditions**

Access to a decent-paying job and benefits is essential to economic security for individuals and families across the Commonwealth. Although Massachusetts is home to a dynamic economy, many workers have struggled to secure employment that pays a livable wage, and certain irresponsible employers have preyed upon the resulting uncertainty. The AGO will combat anti-worker, discriminatory, or unsafe employment practices that impact workers across the Commonwealth, including by:

- Prioritizing worker exploitation cases, including those that involve wage theft, child labor, labor trafficking, public construction, and civil rights violations
- Focusing enforcement efforts on misclassification, joint employer status, prevailing wage, and pay equity
- Supporting a strong wage theft bill and other legislation to curtail anti-worker conduct and contract provisions, including non-competes, non-disparagement, mandatory arbitration, and class action waivers
- Supporting second chance employment by advocating for antidiscrimination protections for people with criminal records and limitations on the use of credit history in hiring
- Communicating clearly with the public about workers’ rights including through widespread know-your-rights trainings and clinics
- Working to support small businesses and industries recovering from the COVID-19 pandemic to help ensure continued economic growth in the Commonwealth and access to jobs

**Objective 1.4: Expand access to wealth building opportunities for all, with a focus on closing the racial wealth gap**

The racial wealth gap is significant and persistent, including across the Commonwealth. For example, a study conducted by the Federal Reserve Bank of Boston found that the median net worth of Black households in the Greater Boston area was just \$8, compared to \$247,500 for white households. Home equity makes up the largest source of wealth for most American families, but here in Massachusetts the homeownership rate is just 37.4% for Black families compared to 70.4% for white families. Closing the racial wealth gap would grow the Massachusetts economy by billions of dollars, while ensuring that communities of color have equitable access to economic mobility and opportunity. It is also critical that the AGO addresses the structural drivers of wealth inequality to promote equitable access to wealth-building opportunities in Black and Brown communities. For example, the AGO can:

- Continue to expand community engagement efforts to provide information, especially in communities of color, to assist access to employment, housing, credit, and affordable, high quality financial services
- Develop and support policies aimed at closing the racial wealth gap, including first time homeownership programs, criminal debt reform, expanded protections for people with criminal records in employment and housing, increased opportunities for entrepreneurs of color, and housing reform, including partition and municipal tax lien foreclosure reform
- Leverage the AGO’s grantmaking function to fund evidence-based initiatives designed to address historical inequities
- Support re-entry programs and services for individuals returning to their communities after a period of incarceration



## **Strategic Goal 2: Protect and promote public health and safety, with particular attention to closing gaps in health care access and environmental health**

Public health and public safety are two sides of the same coin. The growing mental health crisis, the staggering scale of the ongoing opioid epidemic, and unacceptably high rates of gun violence are some of the most complex and challenging public health and public safety problems of our time. Likewise with respect to the existential threat of climate change. The AGO recognizes that these public health and safety issues require a thoughtful approach, which will include:





**Objective 2.1: Be a state and national leader on gun violence prevention and champion common sense gun laws**

On average, 255 people die and 688 people are wounded by guns in Massachusetts each year, which has cost the Commonwealth \$2 billion dollars. Guns are the fourth leading cause of death among children and teens in Massachusetts, and gun homicides involve disproportionately Black and Brown victims. Because Massachusetts has some of the strongest gun laws in the country and leads the nation in investing in community violence intervention strategies, these numbers are among the lowest in the nation, but are still unacceptably high. The AGO will prioritize enforcement of the Commonwealth’s gun laws, and sustained investment in community-based gun violence prevention. For example, the AGO will:

- Launch the Gun Violence Prevention Unit to coordinate and lead gun-related work across the office and nationally in partnership with violence prevention organizations
- Hold accountable manufacturers, distributors, and retailers of ghost guns for misleading sales and marketing practices
- Criminally prosecute large scale gun traffickers and ghost gun merchants who profit from gun violence and illegal firearms sales in the Commonwealth
- Defend the Commonwealth’s nation-leading gun laws against challenges brought by special interest groups that oppose common sense regulation
- Enforce the Commonwealth’s assault weapons ban
- Support and champion common sense gun legislation, including legislation that will close gaps in the Commonwealth’s gun laws related to ghost guns and semi-automatic rifles and strengthen data collection and transparency around gun violence
- Support and grant-fund community-based violence prevention efforts
- Support local law enforcement by providing training and technical assistance on gun law compliance

**Objective 2.2: Prioritize access to health care, including mental health care, and work to reduce disparities in social determinants of health and health outcomes**

Health is fundamental to a person’s ability to participate fully in every aspect of their life. Social determinants of health—that is, underlying social, economic, and environmental conditions that shape a person’s life—play a significant role in a person’s overall lifetime health. Because these determinants of health vary by race, ethnicity, disability status, primary language, and other factors, some people—particularly Black and Brown people—experience substantially worse health outcomes than other residents. Like the rest of the nation, Massachusetts struggles with these health disparities: health disparities facing communities of color have been estimated to cost the Commonwealth approximately \$5.9 billion each year. The AGO can play a role in reducing health disparities and promoting health equity, including for example, by:

- Prioritizing enforcement work to address nonmedical factors (i.e., social determinants of health) that influence health outcomes, in areas such as housing, education, and employment
- Holding accountable health care delivery systems and insurers that limit or erect unlawful barriers to accessing care
- Continuing to demand compliance from MassHealth mental health providers that do not meet regulatory requirements
- Supporting policies that expand access to health care services, reduce the costs of prescription drugs, promote a diverse workforce, and reduce racial disparities in maternal and infant health
- Targeting enforcement and policy work at improving access to mental health services
- Addressing anti-competitive behavior by actors in the health care system which increase health care costs in the state, one of the largest barriers to access
- Ensuring that providers who participate in the MassHealth program meet the Commonwealth’s rigorous professional and legal requirements
- Continuing to prioritize tobacco and e-cigarette enforcement which disproportionately affects communities that suffer from poor social determinants of health
- Using the AGO’s Community Benefits program—which provides guidance to non-profit hospitals and health plans on how to develop and report on the benefits and programs they provide to the public—to increase transparency and accountability around the unmet health needs of underserved communities throughout the Commonwealth
- Using grantmaking to improve health equity and health outcomes including for example, the recently launched Maternal Health Equity Grant program which aims to provide Massachusetts residents with culturally competent pregnancy and postpartum support services to reduce maternal health disparities and avoidable health care spending

### Objective 2.3: Be a national leader in protecting reproductive rights and gender affirming care

Since the United States Supreme Court eliminated the federal constitutional right to abortion in *Dobbs v. Jackson Women's Health*, nearly half the states in the country have severely restricted or altogether banned access to abortion. Some states have begun to target patients who seek abortion in states like Massachusetts where it remains accessible—as well as the providers who give that care. States have also sought to ban gender affirming care and to criminalize providers and parents who facilitate access to it. In this national landscape, Massachusetts must be a beacon of access for reproductive justice and gender affirming care, and a safe harbor for those who come to the Commonwealth for these purposes. The AGO will continue to be a national leader in reproductive justice and gender affirming care, including for example by:

- Launching the Reproductive Justice Unit to coordinate and lead the office—and the nation—in this work
- Partnering with abortion protective states on reproductive justice and gender affirming care, including by leading the fight against attempts to restrict access to medication abortion and gender affirming care
- Ensuring compliance with the Commonwealth's laws that affirm the right to an abortion and gender affirming care and that protect those seeking and providing that care
- Strengthening data privacy protections for patients and providers
- Addressing crisis pregnancy centers and other private actors who undermine choice or access to abortion through misleading or otherwise illegal practices
- Championing policies designed to expand access to full spectrum reproductive health care in the Commonwealth
- Working to address disparities in maternal health
- Supporting the Abortion Legal Hotline (833-309-6301) to ensure accurate information and legal services are available to those in need





**Objective 2.4: Use every tool of the office to achieve environmental and climate justice and promote fair and affordable decarbonization with the urgency required to meet the existential threat of climate change**

The AGO has been on the forefront of the fight to address climate change at the state and federal level and will treat this work with the urgency it requires. In doing so, we will fight for environmental justice to ensure that all residents can live in healthy and safe communities, especially those in low income, rural communities and communities of color who are disproportionately harmed by the climate crisis. This work will include:

- Prioritizing environmental justice, including by partnering with state and local agencies to protect vulnerable communities and address the legacy and ongoing impact of pollution and environmental hazards
- Enforcing laws to protect and promote environmental health, with a focus on communities suffering disproportionate and historic environmental burdens
- Uniting with other states on environmental protection and climate justice work of national significance
- Defending state laws and policies intended to address climate change from legal challenges by special interests
- Using the tools of the office to champion equitable decarbonization—that is, reducing the Commonwealth’s reliance on fossil fuels in a way that will not overburden historically marginalized communities—including by continuing to advocate for cost-effective and equitable grid modernization so that the Commonwealth and our residents can realize the benefits of solar and other renewable energy sources
- Working with state partners, including the Department of Public Utilities, to support the Commonwealth’s transition away from natural gas as a heating source for homes and businesses
- Holding accountable those who harm the environment and mislead the public about it, including through our groundbreaking litigation against Exxon Mobil
- Using the full extent of the AGO’s legal authority to limit utility rate increases by electric and natural gas providers
- Supporting federal, state, and local policies to meaningfully address climate change, including legislation that would permit the AGO to direct settlement funds to local environmental projects benefitting underserved communities

**Objective 2.5: Continue cutting edge work to address the opioid and drug crisis and support communities and families impacted by that crisis**

The AGO has engaged in some of the strongest and boldest legal advocacy in the country to address the opioid crisis, including by leading the nation in exposing the wrongdoing of Purdue Pharma and the Sackler family. But we continue to experience high rates of opioid-related overdoses and overdose deaths, and we must provide for the growing population of people who need access to recovery services. Combatting the opioid epidemic thus remains a top priority for the AGO. The AGO will build upon a strong legacy of opioid work by, for example:

- Holding pharmaceutical and other companies accountable for engaging in unlawful practices that have contributed to the opioid crisis
- Prosecuting drug diversion and illegal prescribing of opioids and other illicit drugs
- Working in partnership with federal and local law enforcement partners to shut down large-scale traffickers of illegal opioids and synthetic opioids into the Commonwealth
- Supporting policies that expand substance use treatment, harm reduction, and legal protections for people in recovery
- Ensuring that substance use treatment programs provide safe, non-discriminatory, medically necessary and appropriate care
- Expanding partnerships with community-based substance use prevention and treatment organizations, and providing relevant trainings and guidance
- Continuing to engage with the Opioid Recovery and Remediation Fund and municipalities to maximize the impact of opioid settlement funds
- Using grantmaking to ensure access to evidence-based, culturally and linguistically appropriate opioid use disorder treatment services
- Working with the Family Advisory Council and residents impacted by the opioid crisis to inform our strategy on addressing the opioid and drug crisis in the Commonwealth

**Objective 2.6: Advance the right of elderly people to live with dignity and remain in their communities free from abuse, neglect, and exploitation**

Each year, thousands of elders are abused, neglected, or exploited across the Commonwealth. Research estimates that one out of every ten people over the age of sixty nationwide are victims of abuse each year, with an estimated national annual loss of \$36.5 billion for elderly victims of financial abuse. The AGO has an important role to play in advancing elder justice—that is, the right of elderly people to live with dignity and remain in their communities free from abuse, neglect, and exploitation—and will prioritize elders across its work by:

- Launching the Elder Justice Unit to lead this work and engage with stakeholders from across the state and country to meet the needs of elders
- Using the office’s enforcement tools to pursue those who attempt to take advantage of elders
- Ensuring that all elders have access to high quality care from nursing homes and other long-term care facilities, including by working with state government partners to strengthen oversight over such facilities
- Prosecuting elder abuse and exploitation cases
- Developing education and training materials for elders and their caregivers to help prevent and address elder abuse and neglect
- Ensuring that those who live in Assisted Living Residences enjoy robust protections against contractual terms and policies that may result in unlawful or unfair evictions

**Objective 2.7: Continue to support and advocate for crime victims and survivors**

The AGO regularly provides support to victims and survivors of crime who have suffered serious harms and lifelong trauma, including human and labor trafficking victims. We have a dedicated team of professionals who support victims and survivors in many ways, including through the criminal investigation and prosecution processes, assisting with obtaining deferred status and U and T visas for noncitizen victims in the United States, and ensuring compensation for victims. The AGO will continue to invest in, and expand, this critically important work, including by:

- Continuing to use the successful multi-disciplinary team approach to human trafficking prevention and prosecution
- Working closely with victims of insurance and financial fraud to ensure access to restitution and compensation
- Bolstering our talented victim advocate services team to provide meaningful, professional support for victims of crime
- Implementing model U and T visa and deferred action protocols and sharing information with the community and our colleagues in law enforcement
- Ensuring that victims and survivors of violent crime can continue to access financial assistance through our Victim Compensation and Assistance Division for uninsured medical and dental care, mental health counseling, funeral and burial costs, and income lost due to the inability to work
- Continuing to serve as the board chair of Massachusetts Office for Victim Assistance (MOVA), which works to ensure that the all victims and survivors of crime across the Commonwealth are supported and empowered by access to high quality, trauma-informed services



# Strategic Goal 3: Protect and strengthen the health, safety, and well-being of our youth

The AGO is committed to addressing the challenges facing our young people, the next generation of leaders. The AGO will work to promote positive outcomes for vulnerable children and youth across the Commonwealth, including:





**Objective 3.1: Work to improve the health and well-being of youth, including by tackling the youth mental health crisis and its root causes, such as harmful products, bullying, hate, and harassment**

Youth across the Commonwealth are in the midst of a mental health crisis, made worse by societal, environmental, economic, and political factors. The AGO is committed to using the full power of the office to tackle these problems, including by:

- Addressing bullying, hate, and harassment in schools including by continuing to lead a statewide initiative on addressing hate in school sports, and by working directly with school districts after instances have occurred and with partners on prevention efforts
- Addressing the addictive and harmful mental health impacts of social media platforms through enforcement and litigation, policy, and community engagement work
- Targeting the marketing and sale of harmful and addictive products to vulnerable youth that may drive poor health and mental health outcomes, including e-cigarettes and sports betting
- Ensuring continued compliance with the Commonwealth’s behavioral health parity law, particularly on behalf of children and adolescents
- Using the tools of the office to ensure that youth have access to safe and healthy environments for living and learning, including by enforcing laws to address air quality issues that exacerbate asthma, advocating for increased funding to remove lead from drinking water and homes, and supporting policies that regulate heavy metals in foods
- Engaging in policy advocacy to improve equitable access to mental health services for children and youth
- Continuing to offer grantmaking opportunities to support mental health treatment access for children and youth in educational, community, and childcare settings, including by ensuring youth can access behavioral and mental health services through schools

**Objective 3.2: Address the cradle-to-prison pipeline by engaging at the intersection of education and juvenile justice**

The cradle-to-prison pipeline refers to the cumulative impact of multiple factors—beginning before birth and persisting through childhood, adolescence, and the teen years—that disproportionately divert youth from communities of color toward incarceration. Disparities in child welfare system involvement, educational opportunity based on race and disability, as well as exclusionary school discipline and school policing are significant contributors to the cradle-to-prison pipeline. The AGO will prioritize working to combat educational inequities and disrupt the cradle-to-prison pipeline, including by:

- Working collaboratively with state and local officials to address disparities in educational opportunity, school discipline, physical restraint and seclusion practices, and school policing and to ensure compliance with state law and policy, such as the model School Resource Officer (SRO) Memorandum of Understanding
- Monitoring and pursuing appropriate action against school districts and police departments that engage in systemically biased school discipline, restraint/seclusion, or policing practices
- Supporting legislative initiatives that reduce on-ramps to the pipeline, including for example the Raise the Age legislation to increase the maximum age for which the juvenile court has jurisdiction over young people



**Objective 3.3: Work to break down barriers that impede access to a high-quality education and equal educational opportunities for students of color, low-income students, immigrant students, students with disabilities, LGBTQ+ students, and other marginalized student populations**

To ensure the long-term health and vitality of our economy, our communities, and our democracy, Massachusetts must do more to meet the needs of students who have been underserved for far too long, particularly Black and Brown students, students with disabilities, LGBTQ+ students, and low-income students. As such, the AGO will prioritize working to break down barriers that impede access to a high-quality education, including by:

- Collaborating with local, state, and federal education officials to promote access to safe, supportive, inclusive, and high-quality learning environments for all students
- Offering guidance and ensuring compliance with respect to legal requirements that protect equal access to education, such as the AG’s Advisory on Equal Access to Education Regardless of Immigration Status
- Leading national advocacy to combat policies designed to exclude LGBTQ+ kids from school communities or to ban books or censor classroom discussions that provide a welcoming, inclusive, and supportive environment for all students
- Continuing to break down barriers to higher education by prioritizing student debt relief, and supporting policies designed to change admissions preferences that are associated with racial disparities in admissions

**Objective 3.4: Promote safe and healthy employment opportunities for youth, while holding accountable those who violate child labor laws**

The number of minors employed in the United States in violation of child labor laws increased 37% over the last year alone, and vulnerable children across Massachusetts are at risk of exploitation in the workplace. At the same time, the AGO appreciates the importance of access to employment opportunities for young people to gain knowledge, skills, and financial resources that will serve them later in life. To help ensure access to safe and healthy employment opportunities, the AGO will:

- Engage in robust enforcement of child labor and trafficking laws, with a particular emphasis on vulnerable youth, including migrant youth
- Conduct community outreach and prevention efforts to ensure that caregivers, community members, and youth are aware of kids’ workplace rights and know where to turn for assistance
- Continue to offer the Healthy Summer Youth Jobs grant to help provide access to safe and healthy summer employment opportunities

**Strategic Goal 4:  
Defend and embody the good of Massachusetts government, while holding the powerful to account, particularly those who misuse roles of authority or public trust**

Massachusetts has some of our nation’s strongest and most effective laws, which have made the Commonwealth the best state in the country for people to live and raise their families with the protections needed to prosper and thrive. We have nation-leading laws regulating guns and protecting consumers, workers, and civil rights. Because these laws work, they are increasingly under attack by special interest groups emboldened by recent decisions of the United States Supreme Court. At the same time, the AGO recognizes its unique role in improving government accountability and criminal legal reform in the Commonwealth. The AGO thus intends to defend the strong protections and fairness of our laws while holding the powerful to account, including by:







**Objective 4.1: Defend our nation-leading consumer protection, employment, civil rights, environmental, and gun safety laws against challenges from special interests**

As the country becomes more politically polarized and as special interest groups become emboldened by the direction of the United States Supreme Court, Massachusetts must lead on gun violence prevention, civil rights, worker and consumer protections, and health care access. This leadership will draw lawsuits from well-financed special interests, and our office stands at the forefront in defending these important and nation-leading protections. In particular, the AGO is committed to:

- Ensuring that our team of lawyers and staff defending our gun laws against Second Amendment lawsuits continues to lead the way in providing a robust defense of our nation-leading gun laws
- Expanding the Commonwealth’s nation-leading consumer protection, worker protection, and civil rights, and environmental laws, and then defending them from challenge by special interest groups
- Supporting other states in defending against legal challenges that could have implications for laws in the Commonwealth

**Objective 4.2: Prioritize accountability for those who hold positions of authority or public trust for abuses of power or misuse of public funds**

The AGO has a dedicated and talented team of lawyers and staff focused on public integrity, corruption, and fraud. The AGO will renew its focus on holding accountable those who abuse their power, violate public trust, or misuse public funds, including by:

- Prioritizing public integrity and public corruption enforcement, including against government officials who have misused their power and violated public trust or those who have violated campaign finance laws
- Prioritizing enforcement against those who have misused government funds
- Prioritizing enforcement against health care providers who defraud MassHealth
- Enforcing laws against those who submit false claims against the state to protect taxpayer funds from those who seek to defraud the public
- Continuing to enforce the Open Meeting and Public Records laws

**Objective 4.3: Support law enforcement partners who have earned the trust of their communities, while holding accountable those who engage in biased policing**

Effective policing requires community trust and confidence. Many police officers across the Commonwealth work hard every day to earn that trust and confidence despite the considerable challenges and risks associated with their jobs. At the same time, we recognize the importance of holding accountable police departments and officers who violate community trust by engaging in misconduct, including systemically biased policing. The AGO will, therefore, work to support law enforcement who have earned the trust of their communities, while holding accountable those who engage in biased policing practices or contribute to systemic violence, including by:

- Working collaboratively with law enforcement and the Peace Officer Standards & Training (POST) Commission to ensure compliance with laws and best practices in civil rights, police reform, and juvenile justice
- Becoming a trusted resource on policing practices
- Investigating and redressing patterns or practices of racially biased policing under the 2020 police reform law, which gave the AGO authority to pursue these matters
- Supporting state and federal policies focused on ensuring constitutional and bias-free policing and improving data collection around policing practices



**Objective 4.4: Ensure fair and just criminal prosecutions, advocate for the humane treatment of incarcerated people, and support successful re-entry for those who have served their time**

The AGO has several touch points with the criminal legal system and incarcerated people. We have a passionate and hardworking team of prosecutors responsible for prosecuting criminal matters of statewide importance, including in areas related to illegal firearm and drug trafficking, human and labor trafficking, public corruption, white collar crime, insurance and Medicaid fraud, and environmental crimes. We also evaluate claims of wrongful conviction and civil compensation for those who have been wrongfully incarcerated, while working to address and advocate for better treatment of incarcerated people which is crucial to successful reentry. The AGO is committed to ensuring that the office uses best practices on all of these areas, including, for example, by:

- Ensuring that the AGO’s prosecutions are fair and just, and impose serious criminal consequences for individuals who traffic opioids, firearms, and human beings
- Collecting data on criminal investigations and prosecutions to identify and address any racial inequities in our practices
- Working collaboratively with the Department of Corrections (DOC), County Sheriffs, and policymakers to improve the quality of life in prisons and jails across the Commonwealth
- Holding accountable prisons, jails, and their vendors that deny access to basic rights such as constitutionally adequate medical care
- Supporting policies that expand access to health care services in prisons and jails, including reproductive health care, mental health care, and substance use disorder treatment
- Ensuring that the AGO’s defense of state agencies in litigation reflects the values in this plan
- Adopting best practices and leading by example in reviewing wrongful conviction claims in criminal cases prosecuted by the office.
- Evaluating civil wrongful conviction compensation cases as expeditiously as possible to determine where compensation is warranted, and resolving claims as expeditiously as the process allows
- Supporting efforts to reform the state wrongful conviction compensation statute, including lifting the statutory cap on wrongful conviction compensation
- Strengthening civil rights protections for people with criminal records in the areas of housing, employment, and educational opportunities
- Supporting policies that expand re-entry services

**Objective 4.5: Protect voting rights and election integrity in Massachusetts and nationally**

Efforts to subvert elections, misinform voters, and restrict access to the polls have become more aggressive and shameless than at any time in our country’s recent memory. Massachusetts is not immune from these efforts, and must demonstrate our commitment to a strong and vibrant democracy. The AGO will continue to prioritize protecting the democratic system by:

- Coordinating closely with the Secretary of the Commonwealth to ensure the fair and sound administration of elections and application of our voting laws
- Leading voter education efforts, including in houses of correction and jails, across the state
- Holding accountable individuals who intimidate or interfere with voters or their civil rights, as well as those who seek an unfair advantage by breaking our campaign finance laws
- Working closely with our partner states on national election protection and voting rights matters



# Strategic Goal 5: Expand the reach of the AGO and make sure that our legal and advocacy work is informed by and reflects the needs of the communities and residents in every part of our state

The AGO serves all of the Commonwealth—from Attleboro to Adams, Chicopee to Haverhill, Lawrence to Holyoke, Onset to Great Barrington, Stockbridge to Boston. But the AGO recognizes that its services and initiatives do not always reach communities across the state, particularly rural communities. The AGO is committed to regional equity in its work that is, bringing its work into communities outside of the major cities and ensuring that its work is responsive to the varied needs of people across the state. The AGO strongly believes in the importance of inviting communities into its work and listening with humility to the expertise and experiences of people across the Commonwealth. To expand the reach and accessibility of the office, and develop a truly community-informed approach to legal advocacy, the AGO intends to:

**Objective 5.1: Leverage regional offices, public awareness initiatives, grant programs, and staff to reach more communities and establish a greater AGO presence across the Commonwealth especially in communities of color and rural communities**

The AGO can expand the reach of the office into different communities of the state in a variety of different ways, including for example:

- Expanding our Community Engagement Division to ensure a dynamic presence in each regional office
- Developing new partnerships and identifying new opportunities to collaborate with community leaders and advocacy organizations throughout our state, and particularly in communities that are too often left out of state policy conversations
- Ensuring that our work is directly informed by people with disabilities, environmental justice communities, immigrant communities, migrant workers, elders, youth, and low-income residents
- Hosting public meetings, office hours, and other events, including trainings and know-your-rights events, in a variety of accessible locations outside of the metro Boston area, such as Wage Theft Clinics and AGO Office Hours



**Objective 5.2: Ensure appropriate linguistic and cultural capabilities and accessible modalities to reach all of our diverse communities across the Commonwealth**

As the AGO expands the reach of the office, we recognize the importance of accessibility for young people and for the elderly, as well as those with limited English proficiency or with disabilities. We know that to best represent the people of Massachusetts, our services must be culturally competent. So, we will:

- Break down barriers to employment in our office and prioritize recruitment of staff who can best serve all of the Commonwealth’s diverse communities
- Develop accessible, multi-lingual informational materials
- Adopt emerging practices to ensure that people of all abilities and language skills can access all of the services and resources of the AGO
- Provide training or resource supports to lawyers and staff on enhancing accessibility including prioritizing training for leadership and the most public serving/facing staff members
- Identify and address any gaps in whom the office is serving by tracking and evaluating the demographics of consumers and other stakeholders who contact the office

**Objective 5.3: Engage and be guided by communities affected by the work of the AGO**

The AGO will build on the AGO’s strong community engagement infrastructure by expanding efforts to reach historically marginalized communities and inviting them into the work. The AGO will do this, for example, by:

- Developing strategies to reach and engage diverse stakeholders to inform the work of the office
- Creating authentic opportunities for exchanges of information such as issue-specific Advisory Committees, Task Forces, or Working Groups
- Tapping into the perspectives of AGO grantees and other partners to inform the office’s work
- Empowering communities in the results that we achieve, including for example, expanded use of restorative justice models in certain areas

