



WHITE PAPER

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Human Trafficking in the Hospitality Industry: What Industry Participants Should Do to Protect Themselves and Their Customers

In 2016 alone, 4.8 million people were victims of forced sexual exploitation worldwide.¹ Nearly 200,000 were trafficked in the Americas, and more than one million were children.² Moreover, data from the National Human Trafficking Hotline shows that at least 77 percent of human trafficking cases reported in 2016 were based in hotels or motels, the most common “location” for the abuse to occur.³ Indeed, hotels and motels are common sites of human trafficking—they not only offer an affordable and easily accessible location for commercial sex acts, but they also provide privacy and anonymity for both traffickers and trafficked individuals.

There is no doubt that members of the hospitality industry do not want their legitimate services abused by traffickers, nor the safety of their guests jeopardized in this manner. As federal and state authorities, the plaintiffs’ bar, and public sentiment increasingly place pressure on corporations to join global anti-trafficking efforts, the hospitality industry can take proactive compliance-related measures to ensure trafficking does not happen at their hotels.

This Jones Day *White Paper* touches on key aspects of the fast developing law addressing the scourge of human trafficking. More specifically, it sets forth: (i) the laws governing the hospitality industry’s obligations to detect or eradicate sex trafficking at their establishments; (ii) examples of lawsuits filed against members of the hospitality industry; and (iii) suggestions for members of the hospitality industry to best protect their customers and position themselves in this climate of heightened obligations.

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ANTI-TRAFFICKING LAWS AFFECTING THE HOSPITALITY INDUSTRY

Federal Law

In 2000, the U.S. Congress passed the Trafficking Victims Protection Act (“TVPA”) in order “to combat trafficking in persons, ... to ensure just and effective punishment of traffickers, and to protect their victims.”⁴ The TVPA was most recently reauthorized in January 2019, when it was also amended to enhance the U.S. Department of State’s ability to evaluate foreign government efforts to eliminate human trafficking.⁵ The trajectory of the TVPA, which has been strengthened and expanded over time, demonstrates legislators’ increasing efforts to fight human trafficking at home and abroad. In fact, the U.S. Department of Justice (“DOJ”) has credited the TVPA—both its penal and its victim-protection and public awareness components—for the 360 percent increase in human trafficking convictions between 2001 and 2007, as compared to the previous seven years.⁶

It bears emphasis that the TVPA—among other federal legislation—exposes corporate entities to potential criminal liability. With respect to sex trafficking, the TVPA imposes severe criminal sanctions on whoever recruits, solicits, transports, or obtains a person for a commercial sex act (as well as anyone who benefits from such an act) by force, fraud, or coercion, or while knowing that the trafficked individual is under 18 years old.⁷ In prohibiting any “knowing benefit” from a trafficking venture, the TVPA thus extends criminal liability beyond direct participation. Moreover, in 2003, Congress added human trafficking to the list of crimes that can be charged under the Racketeer Influenced Corrupt Organizations (“RICO”) statute, a statute often used to charge the entity or organization, in addition to the individual criminal defendants.⁸ In 2015, another amendment of the TVPA lowered the standard for criminal liability from actual knowledge of the trafficked individual’s minor age (or of the fact that threats or force were used in trafficking), to *either* knowledge or reckless disregard.⁹ Further, the Stop Advertising Victims of Exploitation Act (“SAVE Act”) was enacted in 2015, amending the TVPA in part to add the advertising of sex trafficking to the list of proscribed activities.^{10 11}

Recent changes to the TVPA also illustrate the legislature’s intention to increase the scope of the statute and thus, its reach to corporate entities in civil litigation, including those in the hospitality industry. For example, the Trafficking Victims

Protection Reauthorization Act of 2003 (“TVPRA”) established a federal, civil right of action allowing trafficking survivors to sue their traffickers, which includes a provision allowing plaintiffs to bring suit not only against their “traditional trafficker,” but also against anyone who knowingly benefits—financially or otherwise—as a result of the trafficking.¹² Counsel representing individual plaintiffs in private actions under the TVPRA regard the statute as opening the door to large damage awards against corporate entities, including hospitality locations where trafficking is alleged to have occurred. The statute also allows state attorneys general to bring civil actions against human traffickers.¹³

While not specific to the hospitality industry, the federal government further expanded corporate responsibility to eradicate sex trafficking when it enacted the Allow States and Victims to Fight Online Sex Trafficking Act (also known as “FOSTA-SESTA”) on April 11, 2018.¹⁴ This law allows online websites to be held liable for certain types of user-generated content, including unlawful content relating to child exploitation and sex trafficking. Although the 1996 Communication Decency Act (“CDA”) previously immunized internet service providers from liability for the actions of third party users, FOSTA-SESTA clarifies that the CDA “was never intended to provide legal protection to websites that unlawfully promote and facilitate prostitution and websites that facilitate in advertising the sale of unlawful sex acts with sex trafficking victims...”¹⁵

These enhancements to the federal anti-trafficking statutory scheme serve as a reminder for businesses to be ever vigilant that their services are not misused by criminal actors.

State Law

Criminal and Civil Remedies In 2003, just three years after the passage of the TVPA, Washington became the first state to criminalize human trafficking, and by 2013, every state in the United States had established criminal penalties for traffickers.¹⁶ Today, multiple states provide for criminal *and* civil liability for corporate sex trafficking, including Alabama,¹⁷ Ohio,¹⁸ Mississippi,¹⁹ Oregon,²⁰ Pennsylvania,²¹ Rhode Island,²² South Carolina,²³ Kansas,²⁴ and Texas.²⁵ These statutes often mirror the federal anti-trafficking provisions. In South Carolina, for instance, the list of proscribed trafficking activities is almost identical to that in the TVPA—recruiting, soliciting, isolating, harboring, transporting, providing, or obtaining victims, in addition to facilitating human trafficking or benefiting from it.²⁶ Likewise, Section

98.002 of the Texas Civil Practice and Remedies Code—like the TVPRA—establishes that defendants who engage in trafficking, or who knowingly benefit from a trafficking venture, are liable to the trafficked individual.²⁷ State legislatures have clearly followed the federal government’s lead in prioritizing the fight against human trafficking.

In addition, state legislatures are increasingly passing anti-human trafficking bills specific to the hospitality industry. For example, several states require human trafficking awareness signs to be posted in hotels.²⁸ In Georgia, hotels—along with adult entertainment establishments, massage businesses, and other locations where trafficking may occur—must post information regarding the National Human Trafficking Resource Center hotline, including a brief definition of labor and sex trafficking (“Are you or someone you know being sold for sex or made/forced to work for little or no pay and cannot leave?”).²⁹ By posting these signs, hotels could potentially help an individual realize they are being trafficked and that there are resources available to help them leave.³⁰ Considering that traffickers often utilize control tactics “so coercive that trafficking victims may feel like it’s impossible to leave their situation, or may not even realize that they are being victimized in the first place[,]” these posters could play an important role in intercepting an active trafficking situation.³¹

Moreover, other states are now requiring more drastic measures, including required training of hotel staff for the detection of human trafficking. Minnesota, for example, recently passed a law requiring hotel and motel employees to undergo training on the: (i) definition of sex trafficking; (ii) recognition of potential victims; (iii) identification of commonly associated activities; and (iv) effective responses to sex trafficking situations.³² Other states that have passed laws requiring sex trafficking training at hotels include Connecticut,³³ New Jersey,³⁴ and California. Indeed, in California, as of 2018, hotel and motel employers are required to provide 20-minute human trafficking awareness training to all employees who are “likely to interact or come into contact with victims of human trafficking.”³⁵ The training must include:

- Definitions of “human trafficking” and “commercial exploitation of children;”
- How to identify individuals most at-risk for human trafficking;

- The difference between sex trafficking and labor trafficking in the hotel sector;
- How to report and respond to suspected human trafficking; and
- The contact information of appropriate agencies, including the National Trafficking Hotline number, as well as local law enforcement.

The bill requires employers to give the training by January 1, 2020; to each new employee within six months of their employment in a qualifying role; and then every two years thereafter.

THE ROLE OF HOSPITALITY INDUSTRY PARTICIPANTS IN RECENT ANTI-TRAFFICKING LITIGATION

Criminal Prosecutions

To date, there have not been any criminal trafficking prosecutions naming a member of the hospitality industry. However, recent federal and state criminal indictments against online companies for sex trafficking-related offenses are evidence of a potential sea change that could translate into criminal prosecutions against other corporate entities, including hotel and motel chains.³⁶

Civil Lawsuits

Claims Brought Under the TVPRA A number of recently filed civil cases containing TVPRA claims suggest that, as federal and state authorities increasingly focus on prosecuting sex traffickers and supporting survivors, civil actions against sex traffickers and their facilitators may be increasing as well.³⁷ Most recently, in March 2019, the TVPRA was used for the first time to file suit against hospitality industry participants. In that case, a survivor of sex trafficking filed a lawsuit in the Southern District of Ohio against a number of prominent hotel chains, alleging that the defendants “knowingly benefited from participating in a venture which they knew as engaged in illegal sex trafficking in violation of the TVPRA, 18 U.S.C. § 1591(a) (2), by ... engaging in acts and omissions that were intended to support, facilitate, harbor, and otherwise further the trafficker’s sale and victimization of the plaintiff for commercial sexual exploitation.”³⁸ The plaintiff alleges that the defendants ignored multiple red flags, such as requests for rooms near exit doors, trash cans containing indicators of commercial

sex, refusal of housekeeping services, cash payments, excessive requests for towels and linens, lack of eye contact, visible physical injuries, and even loud screams for help.³⁹ Moreover, the plaintiff alleged that the defendants failed to provide a process for escalating human trafficking concerns, did not require human trafficking training for employees, and failed to enforce their own trafficking policies.⁴⁰ Ultimately, this lawsuit argues that the defendant hotel chains knew that criminal sex trafficking occurred on their properties, were uniquely situated to prevent it, and failed to take “timely and effective” measures to do so while simultaneously accepting the profits, thus making them directly complicit. This, while the first, will doubtless not be the last federal lawsuit alleging TVPRA violations against hospitality industry entities.

Since the majority of corporate sex trafficking cases are still being litigated, there is little settled law regarding corporate liability under the TVPRA. Nevertheless, court documents and trial orders from pending cases can provide corporations with guidance as to the conduct covered under the TVPRA, the legal thresholds required to obtain dismissal, and proactive measures to reduce the risk of liability. For example, earlier this year, in a January 2019 order, the Honorable Judge Paul A. Engelmayer of the Southern District of New York clarified the level of specificity required for corporate sex trafficking claims to survive a motion to dismiss.⁴¹ This order provides members of the hospitality industry with an indication as to how federal judges will treat such allegations. The plaintiff in *Canosa v. Ziff* sued movie producer Harvey Weinstein—as well as The Weinstein Company Holdings, LLC (“TWC Companies”) and various other parties—for sexually abusing and trafficking her.⁴² *Canosa* argued that the TWC Companies violated the TVPA by maintaining employees whose “responsibilities included introducing Weinstein to young women and covering up his assaults”; paying for and facilitating Weinstein’s travel, despite knowing of his illicit practices; and tying “job benefits to the commission of the forced sexual advances and sexual assaults...”⁴³ She also alleged that the TWC Companies “lacked a training program as to sexual harassment policy and law, an effective process for reporting and investigating complaints of sexual assault or harassment, and a meaningful or consistent process for documenting complaints of such conduct.”⁴⁴

The district court rejected the TWC Companies’ argument that *Canosa* did not adequately allege that they *actually* participated in Weinstein’s sex trafficking venture.⁴⁵ Specifically,

Canosa’s claims survived dismissal because she pled “specific means and methods used by multiple company employees to facilitate Weinstein’s sexual assaults and to cover them up afterwards.”⁴⁶ Moreover, while there is not yet a final decision in *Canosa*, the plaintiff’s complaint suggests that corporations that implement mandatory training programs on sex trafficking, assault, and harassment, as well as policies for reporting, investigating, and documenting such complaints, can significantly reduce the risks of litigation.

Claims Brought Under State Law Sex trafficking lawsuits against hotel chains have also been filed under state statutes. In December 2017, for example, the estate of an allegedly trafficked victim filed a lawsuit against an international hotel chain and various Backpage entities under the Oregon sex trafficking statute, which closely mirrors the TVPA,⁴⁷ and under other statutes and theories, for the sex trafficking and death of a woman named Ashley Benson.⁴⁸ Similar to the claims made in the Ohio case discussed above, the Oregon complaint alleges that the hotel chain knew or should have known—based on previous law enforcement activity on the premises—that the hotel was located in an area known for sex trafficking activity.⁴⁹ The complaint also alleges that the hotel knew or should have known that Benson was being trafficked based on multiple indicators of illegal commercial sex activity, such as cash payment and checking in with an out-of-state identification and no luggage.⁵⁰

Similar complaints against hotels and motels have also been filed in Pennsylvania, Maryland, and Texas.⁵¹ Specifically, in March 2017, a sex trafficking survivor filed the first ever civil complaint under Pennsylvania’s 2014 Human Trafficking Law.⁵² Identified only as “MB,” the plaintiff alleged that she was trafficked at a local motel for more than two years, that motel staff knew this was occurring, and that at least one motel clerk was aware that she was a minor and would even direct “clients” to the room where she was held captive.⁵³ This case is still being litigated; meanwhile, at least one other sex trafficking complaint against hospitality industry participants has been filed in Philadelphia state court.⁵⁴

These lawsuits are the first in what will, in all likelihood, be an ongoing succession of suits by victims of sex trafficking, targeting companies they believe facilitated their exploitation and seeking some form of restitution for what they suffered. As awareness of sex trafficking increases, more states are likely to pass laws providing plaintiffs with a civil remedy for human trafficking.

MOVING FORWARD

Given this changed landscape, it is imperative moving forward that members of the hospitality industry know their obligations and consider implementing effective safeguards to mitigate the risk that human trafficking will occur at or involve their premises and personnel. Hotel and motel chains will need to first and foremost be proactive in complying with existing anti-trafficking laws and regulations, such as posting human trafficking awareness notices (where applicable). But they may also consider examining current methods of compliance in order to ensure that they have done their part in this global effort to eliminate modern slavery. These methods might include robust, mandatory training for employees within the hospitality industry, covering topics such as:

- The definition, history, and practice of human trafficking;
- Detecting human trafficking through awareness of common red flags; and
- Reporting and responding to suspected human trafficking.⁵⁵

Additionally, organizations fighting human trafficking recommend that members of the hospitality industry take the following measures: adopting a company-wide anti-trafficking policy; allowing customers to donate hotel points to anti-trafficking organizations; establishing partnerships with local shelters to provide beds for survivors; hiring suppliers and contractors with ethical labor practices; posting the National Human Trafficking Hotline in each room; and requiring all franchisees and member companies to implement these protocols.⁵⁶

While these steps are nonexhaustive, they can serve as a starting point for companies to create and implement anti-trafficking measures that are both effective and appropriate for their business needs.⁵⁷ In doing so, hospitality industry participants will be best positioned to combat sex trafficking, protect their customers, and reduce the risk of criminal and civil liability.

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ENDNOTES

- 1 See *Global Estimates of Modern Slavery: Forced Labor and Forced Marriage*, INTERNATIONAL LABOR ORGANIZATION AND WALK FREE FOUNDATION 10 (Sept. 19, 2017), available at http://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf.
- 2 *Id.* at 11.
- 3 *National Human Trafficking Hotline Data Report; United States Report: 1/1/2016 – 12/31/2016*, NATIONAL HUMAN TRAFFICKING HOTLINE 5 (2017), <https://humantraffickinghotline.org/sites/default/files/2016%20National%20Report.pdf>.
- 4 Trafficking Victims Protection Act, Pub. L. No. 106-386, 114 Stat. 1466.
- 5 Trafficking Victims Protection Reauthorization Act of 2017, Pub. L. No. 115-427.
- 6 *Human Trafficking Prosecution Unit (HTPU)*, THE U.S. DEPARTMENT OF JUSTICE (Oct. 18, 2018), <https://www.justice.gov/crt/human-trafficking-prosecution-unit-htpu>.
- 7 18 U.S.C. § 1591(a) (2018).
- 8 Trafficking Victims Protection Reauthorization Act of 2003, Pub. L. No. 108-193, 117 Stat. 2879.
- 9 Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22, § 108, 129 Stat. 227.
- 10 Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22, § 118, 129 Stat. 227.
- 11 The SAVE Act survived a constitutional challenge in *Backpage.com, LLC v. Lynch*, 216 F. Supp. 3d 96 (D.D.C. 2016). *Backpage.com* argued that the Act infringes on its First Amendment rights to continue hosting “adult-oriented and escort” classified ads, and that the threat of potential prosecution constituted an Article III injury sufficient to establish standing. *Backpage.com, LLC v. Lynch*, 216 F. Supp. 3d at 99-103. The court granted the government’s motion to dismiss, and found that the Save Act does not proscribe *Backpage.com*’s intended future conduct of hosting third party advertisements for legal adult services and, even if *Backpage.com* did host sex trafficking ads, such ads did not constitute speech protected by the First Amendment. *Id.* at 103-105, 110.
- 12 Specifically, 18 U.S.C. § 1595(a) provides that any individual “who is a victim of a violation of this chapter [18 USCS §§ 1581 et seq.] 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.” 18 U.S.C. § 1595(a) (2018). Courts have also found that the TVPA permits recovery of punitive damages. See, e.g., *Ditullio v. Boehm*, 62 F.3d 1091, 1093 (9th Cir. 2011).
- 13 *Id.* at § 1595(d).
- 14 Allow States and Victims to Fight Online Sex Trafficking Act of 2017, Pub. L. No. 115-64, 132 Stat. 1253.
- 15 *Id.* at § 2(1)-(2).
- 16 Anne Teigen, *Prosecuting Human Traffickers: Recent Legislative Enactments*, National Conference of State Legislatures (Sept. 2018), http://www.ncsl.org/Portals/1/HTML_LargeReports/Prosecuting_Traffickers__091818__32767.pdf.
- 17 ALA. CODE §§ 13A-6-150 to -162 (LEXIS through 2019 First Special Sess.).
- 18 OHIO REV. CODE ANN. §§ 2307.51, 2905.32 (West 2019).
- 19 MISS. CODE ANN. §§ 97-3-54.1 to -54.9 (LEXIS through 2019 Reg. Sess.).
- 20 OR. REV. STAT. §§ 30.867, 163.266 (LEXIS through ch. 4 of 2019 Reg. Sess.).
- 21 18 PA. CONS. STAT. §§ 3001-72 (LEXIS through 2018 Reg. Sess. Acts).
- 22 R.I. GEN. LAWS §§ 11-67.1-1 to -26 (LEXIS through ch. 6 of 2019 Legis. Sess.).
- 23 S.C. CODE ANN. §§ 16-3-2010 to -2100 (LEXIS through ch. 2 of Sess. 123).
- 24 KAN. STAT. ANN. §§ 21-5426, 60-5003(West 2019).
- 25 TEX. CIV. PRAC. & REM. CODE § 98.002 (LEXIS through 2017 Reg. Sess.); TEX. PENAL CODE §§ 20A.01 to 04 (LEXIS through 2017 Reg. Sess.).
- 26 S.C. CODE ANN. § 16-3-2010(A)(1)-(3) (LEXIS).
- 27 TEX. CIV. PRAC. & REM. CODE § 98.002 (LEXIS).
- 28 See, e.g., ALA. CODE § 13A-6-170 (LEXIS through 2019 First Special Sess.); ARK. CODE ANN. § 12-19-102 (2019); OHIO REV. CODE ANN. § 5502.63 (West 2019); see also *Compendium of Human Trafficking Awareness Poster State Laws: A Resource Guide*, U.S. DEPARTMENT OF TRANSPORTATION (Feb. 10, 2014), https://cms.dot.gov/sites/dot.gov/files/pictures/HT_Awareness_Poster_Laws.pdf.
- 29 GA. CODE ANN. § 16-5-47 (2018).
- 30 See *Hotel companies step up to fight human trafficking*, POLARIS PROJECT (Jan. 16, 2019), <https://polarisproject.org/blog/2019/01/16/hotel-companies-step-fight-human-trafficking>.
- 31 See *id.*
- 32 2018 MINN. LAWS ch. 179 (codified at MINN. STAT. § 157.177 (LEXIS through ch. 2 of 2019 Reg. Sess.)).
- 33 2016 CONN. ACTS 71 (codified at CONN. GEN. STAT. § 44-5 (LEXIS through 2018 First Reg. Sess.)).
- 34 2013 N.J. LAWS 51 (codified at N.J. STAT. § 2C:13-12 (LEXIS through 218th Second Ann. Sess. 2019)).
- 35 *Id.*
- 36 In 2016, for example, the California Attorney General filed a number of pimping—defined similarly to sex trafficking under federal law—and money laundering charges against executives at *Backpage*, a website that hosted classified advertisements for “adult” and “escort” services. Criminal Complaint, *People v. Carl Ferrer* No. 16FE0224013 (Cal. Super. Ct., Sacramento Cty. filed Dec. 23, 2016), available at https://oag.ca.gov/system/files/attachments/press_releases/backpage%20redacted.pdf. On March 28, 2018, the DOJ also charged seven individuals affiliated with *Backpage* with facilitating prostitution, money laundering, and other similar offenses. Press Release, The U.S. Department of Justice, Justice Department Leads Effort to Seize *Backpage.Com*, the Internet’s Leading Forum for Prostitution Ads, and Obtains 93-Count Federal Indictment (Apr. 9, 2018), <https://www.justice.gov/opa/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution-ads>. Although the federal charges were not brought under the TVPA, when viewed together with the California prosecution, they demonstrate a strengthened commitment to prosecute corporations, including internet websites, for sexual misconduct.

- 37 Recent civil cases brought under the TVPRA against corporate entities include, for example, a 2018 class action lawsuit by multiple women athletes against the U.S. Olympics Committee, the U.S. Taekwondo Association, and related individuals, Second Amended Complaint, *Heidi Gilbert v. U.S. Olympic Committee* 1:18-cv-00981-CMA-MEH (D. Colo. Aug. 24, 2018), and a 2017 lawsuit against Blue Icarus, LLC, a company that owned the condominium where the plaintiff was allegedly trafficked, Amended Complaint, *Hillary Lawson v. Howard Rubin* No. 1:17-cv-06404, 2018 U.S. Dist. Ct. Pleadings LEXIS 19547 (E.D.N.Y. Feb. 20, 2018).
- 38 Complaint at ¶ 107, *M.A. v. TJM Columbus, LLC*, No. 2:19-cv-00849 (S.D. Ohio Mar. 8, 2019).
- 39 *Id.* at ¶¶ 52-55.
- 40 *Id.* at ¶¶ 64, 74, 79.
- 41 See generally *Canosa v. Ziff*, 2019 U.S. Dist. LEXIS 13263 (S.D.N.Y. Jan. 28, 2019).
- 42 *Id.* at *2-3.
- 43 *Id.* at *58-59.
- 44 *Id.* at *8.
- 45 *Id.* at *61.
- 46 *Id.* at *61-62.
- 47 OR. REV. STAT. § 30.867; see also OR. REV. STAT. § 163.266.
- 48 Complaint, *Scott Kocher v. Carl Ferrer* No. 17CV55605 (Multnomah Cty. Cir. Ct., Or. Dec. 22, 2017).
- 49 *Id.* at ¶ 58.
- 50 *Id.* at ¶¶ 55-72, 91-97.
- 51 See, e.g., *Jane Doe (#7) v. Backpage.com LLC*, No. 201832490 (Harris Cty. Dist. Ct., Tex. filed May 14, 2018); *Jane Doe #1 v. Subh Properties, LLC et. al.*, No. C-22-CV-17-000071 (Wicomico Cty. Cir. Ct., Md. filed Feb. 21, 2017).
- 52 *Sex-trafficking victim sues US motel in landmark case*, THE STRAITS TIMES (Mar. 16, 2017), <https://www.straitstimes.com/world/united-states/sex-trafficking-victim-sues-us-motel-in-landmark-case>.
- 53 *Id.*
- 54 See *A.C. v. Roosevelt Inn LLC*, No. 190303355 (Phila. Ct. Com. PI filed Mar. 27, 2019).
- 55 *Human Trafficking in Hotels and Motels: Victim and Location Indicators*, POLARIS PROJECT (2012), <https://ncjtc-static.fvtc.edu/Resources/RS00002856.pdf>.
- 56 *Hotels & Motels Recommendations*, POLARIS PROJECT (July 2018), <https://polarisproject.org/sites/default/files/A%20Roadmap%20for%20Systems%20and%20Industries%20to%20Prevent%20and%20Disrupt%20Human%20Trafficking.pdf>.
- 57 In fact, taking a proactive approach to compliance with state and federal anti-trafficking laws is not only responsible, good governance, it may also be beneficial for business. According to a recent marketing survey, 87% of Americans “would purchase a product because that company advocated for an issue that they care about,” and 76% “would refuse to purchase a company’s product or services upon learning that it supported an issue contrary to their beliefs.” *Brands & Social Activism: What Do You Stand Up For?*, Cone Communications (2017), <https://static1.squarespace.com/static/56b4a7472b8dde3df5b7013f/t/5947dbcf4f14bc4eadcd025d/1497881572759/CSRInfographic+FINAL2.jpg>. Enhancing efforts to combat sex trafficking would likely resonate with younger, socially conscious consumers.

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