

Combating Sex Trafficking: Examining the Spatial Distribution of Hotels in Urban Areas that Facilitate Sex Trafficking in the US¹

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Abstract

This study examines the nature of hotels that have become key locales for the exploitation of sex trafficking victims in all regions of the United States. Almost all the hotels named in the numerous civil suits filed by victims of human trafficking in US federal courts in recent years were in urban areas. The article focuses on the attributes of the hotels where the exploitation has been documented. The hotels are analyzed in terms of their price level and rating, their spatial distribution within cities and the economic attributes of the neighborhood in which they are located. The analysis concludes that the hotels/motels are located close to major highways and airports, are primarily economy hotels and three-quarters of named hotels are in poorer urban neighborhoods. Strategies to address the problem are provided.

¹ This work has been supported in part by National Science Foundation under Award# 1837881, EAGER: ISN: A New Multi-Layered Network Approach for Improving the Detection of Human Trafficking. We thank Sarah Meo, Ph.D. Student, Department of Public Policy at George Mason University's Schar School for assistance with compiling the data from the federal civil sex trafficking cases that greatly supported the research.

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Keywords: sex trafficking, hotel, crime, urban area, spatial distribution of trafficking

Introduction

In 2017, one of the authors attended a large human trafficking conference in North Carolina (McLaurin, 2017). One of the law enforcement speakers on a panel on responses to human trafficking reported that he and his colleagues initially believed that they had successfully combated human trafficking as there were almost no women on the streets of Wilmington, North Carolina being forced to sell sex. But they soon discovered that their sense of accomplishment was misplaced. A major federal-local investigation revealed that the problem of human trafficking has merely been displaced in the city and now sex trafficking was occurring primarily at low rated hotels of the city where human trafficking often converged with the drug trade. The increased use of technology by traffickers had changed their modus operandi and changed the geo-spatial distribution of sex trafficking in a coastal city in this state.

This insight from federal and state law enforcement in North Carolina is reflective of a larger transition in the United States as technology has changed the urban distribution of human trafficking profoundly. The urban environment today remains a key location for the exploitation of victims just as it was in the past (Wingfield, 2011; Shelley, 2010: 53). In recent decades the sex trade has moved online. Evidence of the extent of the online sex trade is provided by a multi-million-dollar research project conducted by DARPA (Defense Advanced Projects Research Agency) of the Department of Defense. Their research carried out during a two-year period found over \$ 250 million in expenditures for over 60 million online sexual advertisements (Greenemeier, 2015).

The analysis in this paper is based of an in-depth analysis of the federal cases involving the enforcement of US human trafficking legislation. These cases reveal the centrality of the Internet to human trafficking. In 2019, of the 390 active U.S. federal trafficking criminal cases, the defendants admitted that they used the internet as their primary method of soliciting buyers in 83.7% of cases (Feehs & Currier, 2020: 28-29).

The transition to an online sex trade has changed sex trafficking in significant ways (Prylinksi, 2020). Historically, there were parts of cities in the United States where individuals went to buy sex. But now, the sale of sex is no longer in plain view and, therefore, less likely for detection by law enforcement.

The prosecuted sex trafficking cases reveal a different current reality. Now after a trafficker solicits a buyer online, the trafficker often transports his victim to meet the buyer, or the buyer may come to the victim who is often held at a hotel (Feehs & Currier, 2020:30) In this new model of human trafficking, hotels become key locales for human trafficking as traffickers can order rooms and access facilities often with anonymity by using online registration and payment systems (Polaris, 2018; Fish, 2017: 13). Analysis of federal criminal trafficking cases reveals that in 2018, 81.5% (312) of these cases identified hotels as locales for the exploitation of victims of sex trafficking and the comparable figure was 80% (296) in 2019 (Feehs & Currier, 2019: 14; Feehs & Currier, 2020: 30).

Sex traffickers prefer to use hotels or motels as the location for the sale of commercial sex rather than houses and apartments because there are certain advantages. These may include enhanced buyer comfort, available infrastructure, affordable pricing, and an appraisal by the trafficker that the hotel is not under surveillance by law enforcement (Polaris, 2018: 18).

The centrality of the hotel sector to the crime of human trafficking reveals that contrary to many conceptions of the problem, human trafficking is not a crime that occurs solely in the illicit economy. Rather, the case analysis presented here reveals that the hospitality industry, a key element of the legitimate economy, provides a central node in the supply chain for sexual exploitation in the United States. This phenomenon is not unique to the United States and has previously been identified in Europe (Paraskevas, 2020). The recent availability of significant numbers of American federal case files has made it possible to analyze the centrality of urban hotels/motels to the crime of human trafficking in the United States. A deep analysis of this data also allows us to understand the spatial distribution of sex trafficking in American cities in many different regions of the country.

In the United States, in contrast to many countries in Western Europe, there is no legal option for individuals to sell sex with the exception of a few counties in the state of Nevada. The crime of human trafficking does not involve all cases of prostitution in the United States. Rather, “human trafficking is a crime involving the exploitation of someone for the purpose of compelled labor or a commercial sex act through the use of force, fraud, or coercion.” (Trafficking Victims Protection Act 2000). Initially, there were only a few cases prosecuted annually but the application of the law has grown over the last twenty years. Over 2,000 federal cases have resulted in the conviction of human traffickers, the vast preponderance of these cases addressing sex rather than labor trafficking (Feehs & Currier Wheeler, 2021).

Civil remedies were made available to victims of human trafficking in the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2003 and expanded in the TVPRA of 2008 (William Wilberforce Trafficking Victims Protection Reauthorization Act, 2008). The TVPRA passed in 2003 allowed victims to file a case in US federal courts against “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” (Trafficking Victims Protection Reauthorization Act (2003). This law was not used until 2015 by victims of human trafficking when the first civil federal sex trafficking case⁵ was brought against a privately owned motel in 2015 in Massachusetts (*Ricchio v. McLean*) (Sagduyu, 2020). This case was followed by many similar cases filed against small and large hotel chains throughout the country. Since that time over 45 cases have been filed against over 200 hotel defendants, including individual hotel owners, hotel chains and management companies. In 2019 and 2020 alone 42 federal civil sex trafficking cases were filed against a total of 189 hotel defendants (Feehs & Currier Wheeler, 2021: 55). Therefore, it is now possible to understand the attributes of the hotels that are named in these cases and to understand their spatial distribution within cities.

Hotels and Sex Trafficking

There has been little scholarly research until recently on the role of hotels and motels in human trafficking in the United States. Most conducted analyses have focused on Western Europe (Paraskevas & Brookes, 2018; Paraskevas, 2020); and more recently on the abuse of hotels in the developing world (Lashley, 2020). The topic has recently received more attention from American hospitality professionals who understood the legal and reputational challenges to the hotel industry as civil suits were initiated starting in 2015 (Atkins & Lee, 2021; Sarkisian, 2015; Spinks, 2020). This analysis has been complemented by the publication by the NGO Polaris (2018) on the role and responsibility of the hotel industry in both sex and labor trafficking. As the number of civil and criminal human trafficking in the United States has grown, there have

⁵ *Ricchio v. McLean et al.* 2015. United States District Court for Massachusetts. 1:15-cv-13519.

also been increasing legal analyses of the phenomenon. Legal scholars have analyzed the liability of hotels and their responsibility in addressing the crime of human trafficking (Fish, 2017; Ross, 2021; Rothberg, 2019).

Despite the apparent centrality of hotels to the phenomenon of human trafficking, there has been an absence of national-level research in the United States to understand the spatial distribution of hotels used for sex trafficking in urban areas. A 2018 study of Trip Advisor reports in seven major cities found that drug-related activity and prostitution were more common in lower rated hotels although fraud, burglary and theft were found more frequently in higher-end hotel (Leung, Yang & Dubin, 2018). In 2018, a pioneering article was published that focused on the spatial distribution of urban sex trafficking using data exclusively from the state of Texas (Mletzko et. al., 2018). The Texas data reveals that sex trafficking most often occurs at low priced hotels/motels near major interstate highways, in the neighborhoods with more than 40 sexual related businesses (e.g., strip/gentlemen clubs and erotic massage parlors advertised online) and in areas with lower socioeconomic status. In addition, their results showed that the distance from the local truck stop, residential instability, and racial/ethnic heterogeneity did not directly correlate to the occurrence of sex trafficking.

Methods of Data Collection

The research presented in this article is based on both qualitative and quantitative data. One of the authors has conducted significant qualitative research on the business of human trafficking including the role of corporate actors (Shelley, 2010; Bain & Shelley, 2015). The authors examined both criminal and civil cases to understand the correlations between the two sources of data. They collected four types of data from federal civil sex trafficking case files including hotel

name, geospatial and demographic data as well as information on the type of exploitation that went on at the hotel. The civil cases initiated against hotels provided detailed information on the types of abuse against human trafficking victims that occurred at hotels.

The data was assembled in two ways. The Human Trafficking Institute (HTI) provided the authors with a list of all Chapter 77 federal civil sex trafficking cases filed between 2015 and 2020. There were many different types of defendants in the list provided by HTI including technology companies. The list of cases between 2015 and 2020 can be considered exhaustive according to the Human Trafficking Institute's methodology. The researchers extracted each case in which the "Type of Entity" was listed as "Hotel". In addition, three cases concerning hotels were filed in 2021 and information on these locales were gathered by the authors, drawing on federal press releases, legal news sources, and the legal databases Justia and LexisNexis. This added cases in six additional states (see Table 2). The cases were organized by Case Year, Case Name, District Court, Case Number, Defendant Name, and Type of Entity (ie. Hotel, Website/Online Platform, etc.).

Using the case numbers provided, the researchers retrieved the civil dockets, complaints, and amended complaints about each case from PACER (Public Access to Court Electronic Records). The allegations listed in the case complaints and amended complaints were used as the qualitative foundation for the researchers' analysis. Therefore, it was possible to learn the name of the hotels named in the suits, their locations, and further research allowed us to determine the characteristics of the neighborhood in which the hotels named were located. For the majority of cases, allegations against individual hotels could be found under the section "Factual Allegations" and the subsection "The Sex Trafficking of [victim's initials]".

After the determination of the hotels named in the civil trafficking suits, the authors identified the star rating of the hotel, its proximity to public transportation, as well as to public highways and transport using the hotel profile data. The star rating of each identified hotel was found on the public website for booking hotel rooms, such as Hotels.com. In addition, the authors also verified the hotel address and extracted the relevant coordinates on Google Maps API to verify the facilities nearby the hotel and also explored whether other transportation facilities were within a driving time of 30 minutes.

To determine whether the named hotels were located in urban areas, the authors used data on the geographical boundaries of U.S. urban areas as defined by the United States Census Bureau to verify whether the hotel address was within city boundaries (Geography Division of the United States Census Bureau, 2021a). If a hotel were not located in an urban area, it was excluded from further analysis. The data used for this paper focused only on hotels in urban areas.

Determining the proximity of the hotels and motels to highways was key because most of the customers of the trafficking victims used cars to reach the hotels. The authors extracted the geospatial data for interstate highways and auxiliary roads from the official website of the United States Census Bureau (Geography Division of the United States Census Bureau, 2021b). The coordinates for the major highway ramps were extracted from Google API. Further, the approximate distance between the major highway ramps and the identified hotels was calculated by the Haversine formula (Inman, 1835) which determines distances on a sphere using latitude and longitude. To explore the air transportation hubs, the location of the international, national, and regional airports is used and extracted from OurAirports which is a free site created by a private pilot (Megginson, 2021).

We also sought to determine the socio-economic attributes of the neighborhood in which the hotels were located. Therefore, for all identified hotels, the authors collected the corresponding demographic data from the 2019 American Community Survey (U.S. Census Bureau, 2021). The authors collected the median household incomes in the ZIP code and the in metropolitan area where the hotel was located from the (U.S. Census Bureau S1901 Income in the Past 12 Months) as well as the percentage of families living below the poverty level in the ZIP code and the metropolitan area where the hotel was located (U.S. Census Bureau S1702 Poverty Status in the Past 12 Months of Families). The data was used to understand the economic attributes of the neighborhood of the urban hotels and to determine whether the hotel was located in an economically disadvantaged neighborhood.

Research Results

The hotels named in federal civil and criminal cases are a small sample of the total numbers of hotels implicated in the problem of human trafficking. Not every state in the United States is cited in either a federal civil or criminal case. Yet the NGO Polaris that runs the National Human Trafficking Hotline, reported that between December 2007 and December 2017, 3596 reports to the human trafficking hotline involved hotels or motels (National Human Trafficking Hotline, 2021). These hotels were located in all 50 states in the U.S. The reported hotels are located in large, mid-size, and small cities of each state. Yet the map of hotspots indicates that some are located along highways between urban locales (Polaris, 2018: 16).

Analysis of the federal civil cases revealed that hotels in many different regions of the United States were locations of sex trafficking including the Northeast, Middle Atlantic, the South, the Midwest, and West Coast. The greatest number of named hotels were in Florida that is a state with a long history of prosecuting human trafficking. One of the first prosecuted federal cases of

human trafficking was the Cadena case that was initiated in 1998 even before the passage of the first federal anti-trafficking law (DOJ, 2015). The prosecution of this case required the cooperation of NGOs with law enforcement who assisted victims who then subsequently testified against their traffickers. Therefore, Florida has a long tradition of having the infrastructure to effectively prosecute human trafficking cases by fostering cooperation with local organizations. The large number of cases in Florida may be explained by its distinction as a tourist destination. It is the second most visited state by tourists in the United States after California. Trafficking is often correlated with tourism and the hospitality industry (Cavagnaro, 2017). Therefore, it is hardly surprising that there is a strong correlation between the number of the named hotels in civil suits and the state of Florida where there have been prosecutions of human trafficking for over two decades. The second largest number of hotels cited in civil cases were identified in Texas, the second largest state in population after California, according to the 2020 census. There is also a well-developed civil society working against human trafficking there especially in its large urban areas. This helps explain why Houston, is the second city in the United States to mandate that the hundreds of hotels within the city provide human trafficking training for employees (Houston Permitting Center, n.d.). This training may be contributing to greater reporting on sex trafficking in hotels.

Table 1. Number of Civil Sex Trafficking Cases in U.S. by State Retrieved from list of the Human Trafficking Institute

States of Federal District	Number of Civil Cases	Number of Defendants	Number of Sex Trafficking Cases Related to Hotels	Number of Defendants Related to Hotels	Number of the Identified Hotels
California	10	53	5	17	16
Colorado	2	9	1	4	4
Florida	7	75	5	51	42

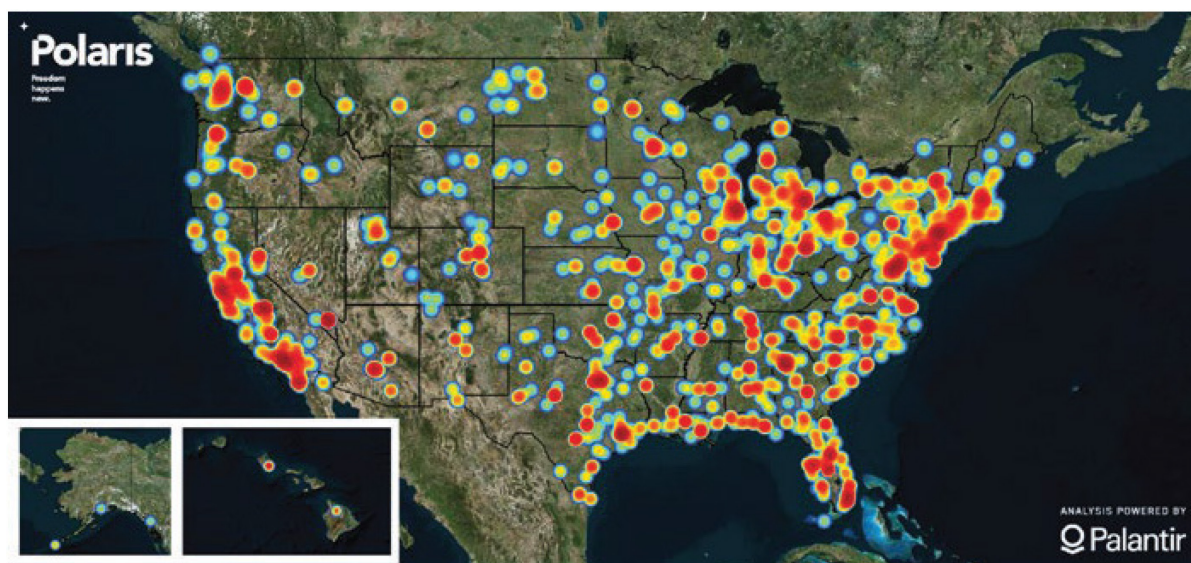
Georgia	9	58	6	42	14
Maine	2	2	1	2	4
Massachusetts	3	11	2	4	3
Michigan	4	22	1	2	2
Minnesota	1	2	1	2	1
New Hampshire	2	4	2	4	5
New York	26	173	2	8	3
Ohio	5	24	5	23	16
Oregon	1	6	1	6	7
Pennsylvania	2	2	1	1	3
South Carolina	1	1	1	1	1
Texas	9	22	6	17	33
Virginia	2	3	1	1	2
Washington	2	7	2	5	7
Total	97	497	43	182	163

Table 2. Number of Sex Trafficking Cases in the U.S. States Retrieved by Individual Research

States of Federal District	Number of Civil Cases	Number of Defendants	Number of Sex Trafficking Cases Related to Hotels	Number of Defendants Related to Hotels	Number of the Identified Hotels
Arkansas	1	1	1	1	1
Florida	1	4	1	4	5
New Jersey	1	6	1	6	7
New York	1	1	1	1	1
Ohio	1	3	1	3	3
South Carolina	1	2	1	2	2
Total	6	17	6	17	19

The number of hotels identified by the Polaris hotline is over 3500 (Polaris 2018:16) but a much smaller number are named in the federal criminal and civil cases. As the data in Table I show, many of the civil cases are filed against entities other than hotels. Therefore, there is only a small subset of the large numbers of hotels implicated in human trafficking that have actual actions taken of them. Tables 1 and 2 refer to no federal cases involving human trafficking in North Carolina but as the opening of this paper reveals, serious investigations were undertaken by both federal and local law enforcement in that state to address the human trafficking that was going in the city of Wilmington, a coastal resort area. The North Carolina cases may have been handled under drug rather than human trafficking statutes because of the convergence of the two phenomena and therefore the hotels implicated in the trade are not present in either federal or civil cases.

The Polaris Hotline data as shown below in Graph 1 reveals that that the hotels associated with sex trafficking are most concentrated on the East Coast, the Gulf region of the United States, the Northern Midwest and California. Yet examining the data of the filed cases reveals that there are none in the Gulf states of Alabama, Louisiana and Mississippi as well as very few in the New York metropolitan area as well as California. This suggested discrepancy between hotline reports and the actual federal civil and criminal cases may reflect the relative capacities of law enforcement in these areas rather the absence of associations between human trafficking and the hospitality sector. This apparent anomaly will be addressed in the conclusion.



Graph 1. Locations of Potential Trafficking Cases in Hotels/Motels Reported to the Human Trafficking Hotline During 2007 to 2017 source: (Polaris, 2018: 16)

Examining the geo-spatial concentration of hotels used by sex traffickers confirms some of the important insights in the (Mletzko, et.al., 2018) study based solely on Texas urban data. Like in the Texas data, this research found that key locales of human trafficking were hotels in all regions of the country that were located close to the on and off-ramps of major highways. This is not surprising as human trafficking in the United States is identified by significant mobility of both the victims of human traffickers as well as by the customers (Shelley, 2010: 241). It also affirms the title of the Polaris publication on the role of the hospitality industry in human trafficking, “On-ramps, Intersections and Exit Routes” (Polaris, 2018). Therefore, despite the fact that most trafficking occurred in urban areas and the surrounding communities, cars were needed by customers to reach the trafficked women. This is a different phenomenon from the past when human trafficking and prostitution were evident on the streets of downtown urban areas. At that time, some customers used cars to reach these urban areas, but human trafficking was not as dependent on automobiles as it is today.

Analysis of the identified hotels in the civil federal cases reveals that the most likely hotel used by a human trafficker is a two-star hotel or an economy hotel. This finding was present in the limited sample of hotels in Texas (Mletzko, et.al, 2018) but it is not consistent across all the hotels in our study. Some of the hotels cited in the legal suits include Hilton, Hyatt and Marriott hotels and motels. Although the sites of trafficking may be lower end properties of these different hotel brands, these hotels/motels are far different from the Day's Inn. Super 8 and Motel 6 that are the most frequently sued hotel chains (Feehs & Currier Wheeler, 2021:54). This finding obtained by extracting the parent companies from the civil suits reveals the presence of higher-level hotel chains as facilitators of human traffickers. This difference from the initial research in Texas is also confirmed by analysis of the income levels of the zipcode where the hotels named in human trafficking suits were located.

As Table 3 reveals, the majority of the 182 hotels named in suits were two-star hotels. Including even lesser rated hotels, one-star, reveals that 130 of the 182 or 71% were clearly economy hotels. Yet over one-quarter of the hotels were three or four stars and in one case was a five star or high-end luxury hotel. This represents a very different situation from that in the Texas study where only economy hotels were identified (Mletzko, et.al., 2018). The higher-end hotels represent some of the most reputable brands in the hospitality industry in the United States.

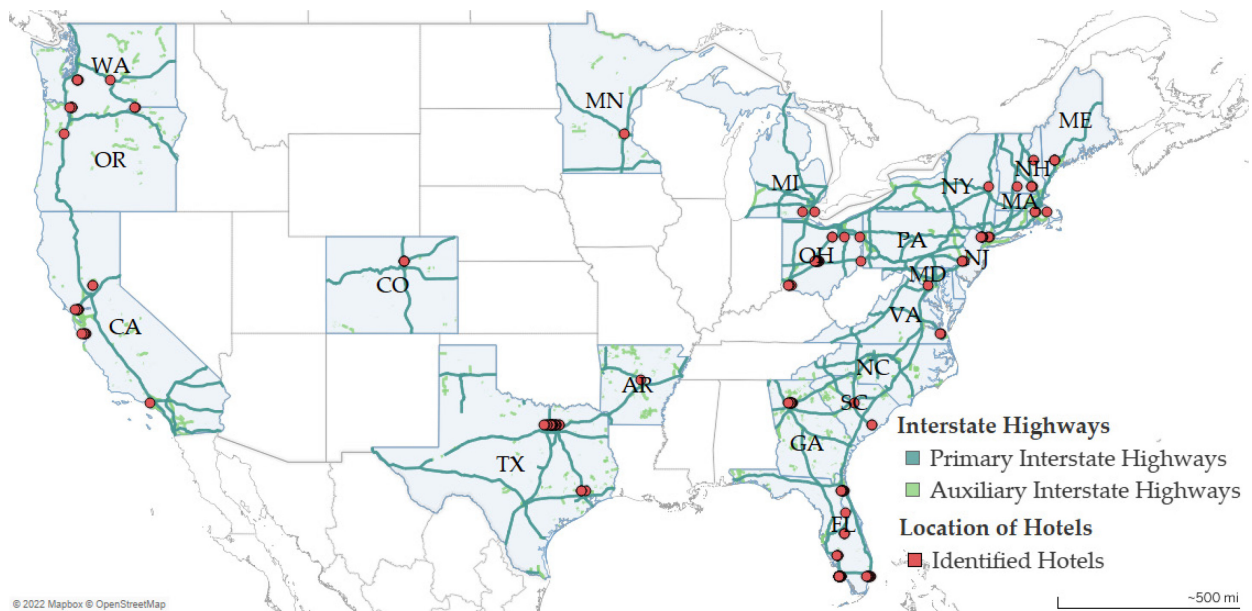
Table 3. Number of the Identified Hotels Classified by Star-Rating Classification

Star Rating	Number of the Identified Hotels	Ownership Types of the Identified Hotels	Brand Name of the Identified Hotels
1	15	Franchise (2), Lease & Manage (2) Privately Owned (11)	America's Best Value Inn (1), Holiday Inn (1), Motel 6 (1), Relax Inn & Suites (1), Others (11)
2	115	Franchise (92),	America's Best Value Inn (2), Baymont

		Lease & Manage (11) Privately Owned (12)	Inn (1), Best Western (4), Budget Inn (1), Clarion Inn (1), Comfort Inn (4), Creekside Lands Inn (1), Days Inn (14), Econo Lodge (1), Economy Inn (1), Extended Stay America (2), Fairfield Inn (4), Hilltop Inn (1), Howard Johnson (6), Knights Inn (2), La Quinta (11), Microtel Inn & Suites (3), Motel 6 (12), Quality Inn (7), Ramada Inn (1), Red Roof (4), Red Roof Plus+ (1), Rodeway Inn (2), Studio 6 (3), Suburban Extended Stay (1), Super 8 (9), TownePlace Suites (1), Travelodge (2), United Inn (1), Others (12)
3	46	Franchise (42), Lease & Manage (2) Privately Owned (2)	Best Western (6), Clarion Inn, (1) Crowne Plaza (2), DoubleTree (3), Economy Inn (1), Embassy Suites (2), Four Points (2), Garden Inn (1), Hampton Inn (2), Hilton (2), Holiday Inn (2), Homewood Suites (1), Hyatt House/Place (2), La Quinta Inn (2), Lafayette Motel (1), Marriott (1), Quality Inn (3), Ramada Inn (2), Red Lion (1), Red Roof Plus+ (1), Residence Inn (2), Rodeway Inn (1), Sheraton (1), Staybridge Suites (1), Wingate Hotel (1), Others (2)
4	5	Franchise (5)	Crowne Plaza (1), Hyatt Regency (1), Renaissance (1), Sheraton (1), Westin (1)
5	1	Franchise (1)	Four Season (1)

Graph 2 maps the named hotels and their proximity to main highways in the United States. The greatest number of named hotels are in urban centers along the east coast. 98% of the identified hotels and motels are close to the ramps of the main interstate highway and auxiliary roads to these interstate highways. Of the named hotels, 68 out of the 182 were near the off and on ramps of major interstate highways I-95 (32) and I-70 (36). I-95 is the major north-south highway along the east coast whereas I-70 is the major east-west highway that runs from Baltimore, Maryland on the east coast to the Rocky Mountains.

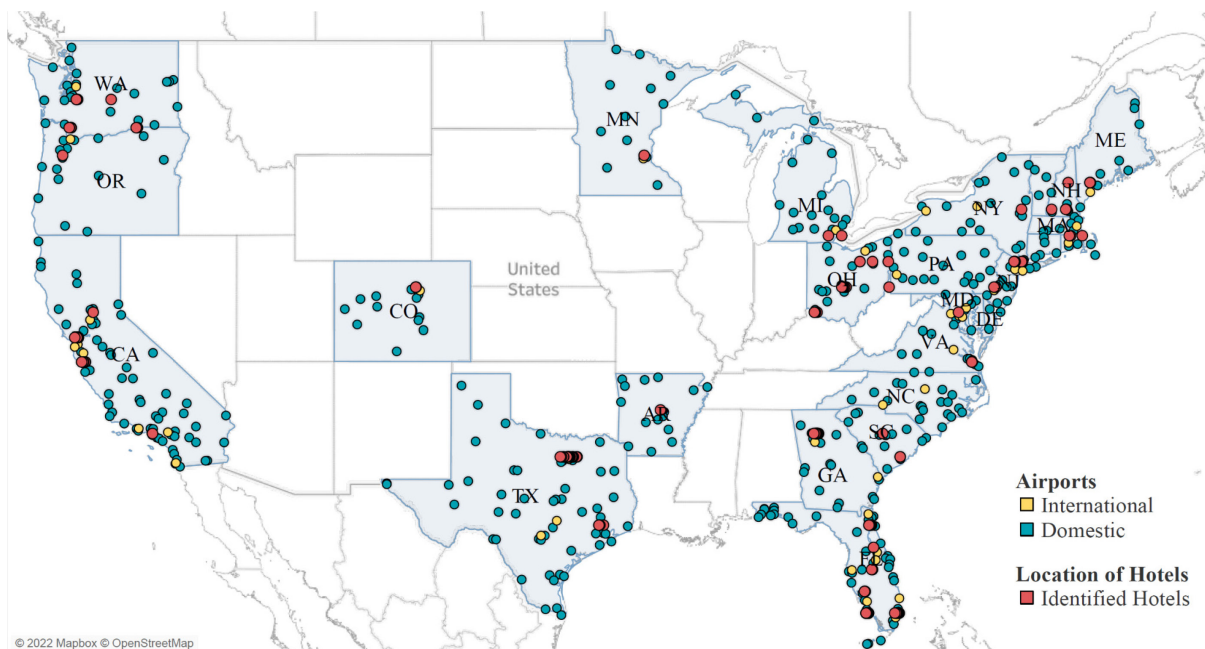
An additional 40 of the named hotels are located close to other main highways that traverse the west coast of the United States (I-5 and I-880), the middle of the United States from Texas north to Minnesota (I-35), across the US from the west coast to New Jersey (I-80) and the south in the US from Texas to South Carolina (I-20). The identified hotels and motels are close to the ramps of the main interstate highway and auxiliary roads to these interstate highways. The distance between the identified hotels and the nearest interstate ramps in the entire U.S. is on average 2.35 miles, with 114 of the 182 hotels located between 0.1 to 0.3 miles of the exit and entrance ramps. Therefore, the hotels involved in sex trafficking are located in places with easy access to major interstate highways or even located next to the ramps.



Graph 2. Map of the Identified Hotels and the U.S. Major Interstate Highways

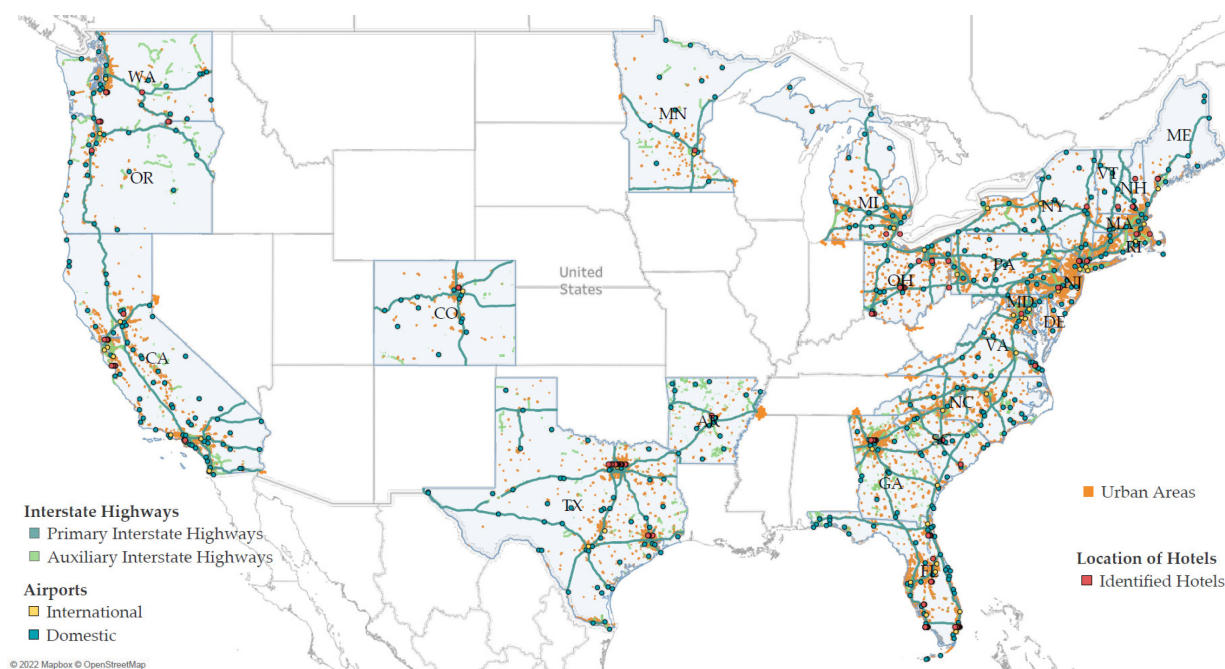
Previous research has examined the proximity of hotels to highways, but our research also focused on the proximity of the urban hotels to airports. Analyzing the geo-spatial distribution of hotels named in civil suits reveals that they are also in close proximity to urban airports. Many

of the airports are primarily domestic but some such as in Florida, New York, Texas, and California are in close proximity to international airports. The proximity of hotels to airports used by traffickers suggests that there may be a desire to reach business people and others in transit who may seek sexual services when traveling. Graph 3 reveals the proximity of hotels to airports in urban areas.



Graph 3. Distribution of International and Domestic Airports and their Proximity to Identified Hotels.

Graph 4 reveals that the hotels selected by traffickers have proximity to both the on and off ramps of highways traversing urban areas and to the airports that are in close proximity to urban areas. This is a phenomenon not confined to one region of the United States but is characteristic of heavily populated urban areas in all regions of the countries. Lightly populated states or states without large urban areas rarely figure in the distribution of hotels named in legal suits.



Graph 4. Distribution of the Transportation Hubs and Identified Hotels in Urban Areas

Our research also examined the geo-spatial distribution of hotels in urban areas to understand the correlations between urban income levels and the location of hotels used by traffickers. Whereas the previous research on the spatial distribution of sex trafficking in Texas revealed that the hotels used by traffickers were confined to poorer and economically disadvantaged regions of Texas cities, this was not confirmed by our data (Mletzko, et.al., 2018). First, the poorest urban areas of cities such as the Bronx in New York or Anacostia in Washington, DC have few hotels. Yet as just discussed, many of the hotels/motels that are named in civil suits are located near the entrances or exits to highways. These are often in less affluent areas of cities as higher income areas are those farther removed from the noise and congestion of highways. But these are not the poorest urban areas of the city as the data below suggests.

Examining the income levels of the zip codes where the hotels named in the lawsuits are located reveals that 77% of the hotels are located in neighborhoods where the median household income

is lower than the median income of the metro area. This result is highly correlated with the star ratings of the hotels. As reflected in the data of Table 3, 71% of identified sex trafficking occurred in one- or two-star hotels, the type of hotel normally located in less affluent urban areas or ones in proximity to key urban transport hubs. On average, the hotels identified in civil suits are located in neighborhoods where the median household income of the zip code is 15.44 percent lower than the average income level of the metro area.

Apart from analyzing the income level of the urban neighborhoods where the trafficking was occurring, we also investigated the percentage of families living below the poverty level in the communities where the named hotels are located. Almost 60 percent of the hotels named in civil cases are located in zip codes where the percentage of families living below the poverty level is higher than in the corresponding metro area.

Conclusions

No longer are individuals trafficked as visible on the streets of American cities. In the past, there were areas of cities associated with the sale of sex but with the rise of the internet and social media, the location of trafficking has changed significantly. The decline of the visibility of this phenomenon on urban streets does not mean that there is a notable reduction in sex trafficking in cities. Rather, there has been a shift of the phenomenon indoors, reducing the risks of detection for the traffickers as they are able to solicit victims and customers online.

Despite this noted shift in cities, there has been very little scholarly analysis of the actual or changing spatial distribution of human trafficking within urban areas in the United States. But the federal prosecutions and the civil suits against the facilitators of human trafficking have provided a remarkable ability to understand where human trafficking is now located as

approximately 80% of federal cases have hotels as key locales of human trafficking. Therefore, by reviewing case files, it is possible to extract names and geo-spatial information on where the hotels used by traffickers are located as this paper has done.

This research reveals that the selected hotels are near transport hubs—on and off ramps of highways and in proximity to airports. In the majority of cases, they are located in poorer areas of the city but not in the poorest as those rarely have hotels or motels. Also, these areas where the hotels cited in the suits are located have the majority of families below the median income level of the city. Yet approximately a quarter of the urban hotels used by traffickers are catering to a more affluent class of clientele and have higher hotel star ratings. This is a phenomenon that has been rarely discussed and conflicts with much research on urban crime that identifies “hotspots of crime” (Weisburd, 2015; Weisburd, et.al, 2017).

The federal trafficking cases reveal a significant underrepresentation of the hotels of the largest American cities such as New York and Los Angeles in the law enforcement actions taken against sex trafficking. This is part of a larger problem in which these big cities have fewer prosecutions of human trafficking although reporting to the hotline suggest that sex trafficking is not less prevalent in large urban areas. Clearly, law enforcement in these locales where there are few cases involving hotels need to be more proactive in pursuing not only the criminal networks that perpetuate the trafficking but the corporate actors that help facilitate this crime.

Recommendations

The analysis points to several important directions by which to reduce the facilitating role of the hospitality sector in the crime of sex trafficking. Reading the federal civil cases analyzed in this paper, it is apparent that victims are often subject to severe physical abuse in the hotels where

they are exploited. This is not an isolated phenomenon as the US human trafficking hotline and court cases reveal. Hotels play a much larger role in human trafficking than has been recognized in the anti-trafficking community or by law enforcement. Moreover, the centrality of hotels shows an absence of corporate social responsibility by those in the hospitality sector, a problem increasingly recognized by specialists in this sector of the economy and by lawyers seeing the reputational consequences of the significant number of lawsuits (Fish, 2017; Ross, 2021; Rothberg, 2019; Soloway & Mohler, 2021).

There are many different ways of responding to the role of hotels as hotspots of human trafficking. Cities have attempted to address the problem. Both Houston and Baltimore require hotels to provide annual training on identifying and reporting sex trafficking (Houston Permitting Center, n.d; Prevent Human Trafficking in the Hospitality Industry, n.d.) Without providing this training, hotels lose their ability to operate in the city. In Baltimore, this training is done in coordination with the NGO ECPAT. This approach should be taken by other cities in their registration process and the involvement of NGOs may provide a more sensitive approach to victims of trafficking.

Different approaches have been tried by law enforcement including undercover operations in hotels, sting operations and also using financial leverage against hotel owners. In Wilmington, North Carolina, law enforcement went to the banks that held the mortgages of the hotels facilitating sex trafficking. Law enforcement informed the bankers that they would close the hotels down for numerous legal violations, then the banks could not collect their mortgage payments. Therefore, the mortgage holders pressured the hotels to change their operating procedures in order to ensure that they could keep operating, otherwise they might face foreclosure of their loans.

The financial community has worked with survivors of human trafficking to identify payment methods and patterns associated with trafficking, including at hotels. These financial indicators of human trafficking in hotels have been incorporated into the algorithms used by banks and payment processors to identify suspicious financial transactions (AML Voices, 2021). These financial indicators can lead to SARS (Suspicious Activity Reports) that are filed with FINCEN, (the financial intelligence unit of the US Department of Treasury) and then can be used to initiate investigations.

Significant problems remain in the hotel industry as it was slow to respond to the misuse of its facilities by human traffickers. Although legislation has been in place since 2003, it was not until 2015 that the initial case was filed by a survivor of human trafficking against a hotel (Sagduyu, 2020). Only several years after the initial case, the number of suits against hotels and hotel chains increased. Reading the civil suit documents, it is clear that not only were the suits initiated by sex trafficking survivors to receive damages but also to force change within the hospitality sector. Since legal actions were initiated against hotels, many different hotel companies have initiated training programs of their staff, often with the assistance of NGOs such as ECPAT (End Child Prostitution and Trafficking) which provides a set of criteria for member hotels (“The Code”) in order to detect and prevent trafficking in the hospitality industry. But legal suits filed recently, even after the initiation of hotel staff training programs suggest that the hotel sector is not doing enough to address the complicity of its employees in facilitating human trafficking.

Moreover, adequate whistleblower protections are not being provided by hotels to workers that report facilitation of human trafficking either to hotel management or to law enforcement. The Anti-Money Laundering Act of 2020 (AMLA) provided incentives for whistleblowers within

financial institutions to come forward when they saw abuse, thereby encouraging employees who might otherwise have been unlikely to risk their jobs to report suspicious activity (Dante et al, 2021). The creation of a sex trafficking whistleblower provision specifically aimed at hospitality workers might also help incentivize the many low-level hotel employees who are the most likely to come in contact with human trafficking to report indicators of sex trafficking in the facilities where they clean rooms and provide services.

There is a large anti-trafficking movement in the United States but without their awareness of the key role of hotels in facilitating human trafficking, they have not used their financial clout to address this issue. Much of human trafficking is now occurring not in family-owned hotels but by ones owned by large publicly held corporations (Feehs & Currier Wheeler, 2021:54). Anti-trafficking NGOs could buy stock in these corporations and then file shareholder resolutions requiring reporting and greater oversight of hotel properties to ensure that human trafficking was not occurring at their facilities. Shareholders could attend annual shareholder meetings of these large corporations and bring up the recent cases initiated by survivors against the company and the financial and reputational costs to the corporation.

The modus operandi of human trafficking has changed dramatically over the last decade with the rise of the internet and social media as key facilitators of human trafficking. With this dramatic transition, the distribution of human trafficking in urban areas has changed dramatically.

Analysts of human trafficking need to pay much more attention to the new geo-spatial distribution of human trafficking and the facilitators of this crime such as the hotel sector but also ride-sharing services. Defining an effective response to the central role of the hospitality industry requires coordinated efforts of civil society, law enforcement, the legal and financial communities, and survivors. Together these groups can use their diverse insights, skills, and

authorities to address this important but insufficiently addressed problem of a key sector of the legitimate economy—the hospitality industry— as a major facilitator of the crime of sex trafficking.

References

AML Voices (2021) : Human Trafficking in 2021 and 2022: Recent Initiatives, Strategies and Challenges, available at: <https://vimeo.com/658660541/7eb8943829> (Accessed on Jan 29, 2022).

Atkins, S., & Lee, P. (2021). Key factors in the industry’s fight against human trafficking. *Hotel Management*. April 24. available at: <https://www.hotelmanagement.net/legal/4-ways-to-protect-hotels-from-human-trafficking-lawsuits> (Accessed on Jan. 29, 2022).

Bain, Christina and Shelley (2015). Hedging Risk by Combating Human Trafficking: Insights from the Private Sector, World Economic Forum. available at: http://www3.weforum.org/docs/WEF_Human_Trafficking_Report_2015.pdf (Accessed on Jan. 29, 2022).

Cavagnaro, Giovanna L.C. (2017) Sex Trafficking: The Hospitality Industry’s Role and Responsibility. Cornell University. available at: https://ecommons.cornell.edu/bitstream/handle/1813/71325/2017_Cavagnaro_thesis.pdf?sequence=1&isAllowed=y (Accessed on Jan. 29, 2022).

Dante, M. S., Joskowicz, D. M., & Hardy, P. D. (2021). AMLA Adds Robust New Whistleblower Provisions for Anti-Money Laundering Violations. *Money Laundering Watch*. January 19. available at: <https://www.moneylaunderingnews.com/2021/01/aml-a-adds-robust-new-whistleblower-provisions-for-anti-money-laundering-violations/> (Accessed on Jan. 29, 2022).

Department of Justice (DOJ) (2015) Mexican National Sentenced to 5 Years for Participating in a Brutal Family-Run Sex Trafficking Organization. available at: <https://www.justice.gov/opa/pr/mexican-national-sentenced-5-years-participating-brutal-family-run-sex-trafficking>, (Accessed Jan. 20, 2022).

Feehs & Currier (2019) 2018 Federal Human Trafficking Report, Human Trafficking Institute. available at: <https://traffickinginstitute.org/wp-content/uploads/2022/01/2018-Federal-Human-Trafficking-Report-Low-Res.pdf> (Accessed on Jan. 28, 2022).

Feehs & Currier (2020) 2019 Federal Human Trafficking Report, Human Trafficking Institute. available at: https://www.traffickinginstitute.org/wp-content/uploads/2020/05/2019-Federal-Human-Trafficking-Report_Low-Res.pdf (Accessed on Jan. 2, 2022).

Feehs & Currier Wheeler (2021) 2020 Federal Human Trafficking Report, Human Trafficking Institute. available at: <https://www.traffickinginstitute.org/wp-content/uploads/2021/06/2020-Federal-Human-Trafficking-Report-Low-Res.pdf> (Accessed on Jan. 29, 2022).

Fish, Gallant. (2017). No Rest for the Wicked: Civil Liability against Hotels in Cases of Sex Trafficking. *Buffalo Human Rights Law Review*, 23, 119-166.

Geography Division of US Census Bureau (2021a) 2021 TIGER/Line® Shapefiles: Urban Areas. US Census Bureau, Geography Division. available at: <https://www.census.gov/cgi-bin/geo/shapefiles/index.php?year=2021&layergroup=Urban+Areas> (Accessed on Dec 2, 2021).

Geography Division of US Census Bureau (2021b) 2021 TIGER/Line® Shapefiles: Roads. US Census Bureau, Geography Division. available at: <https://www.census.gov/cgi-bin/geo/shapefiles/index.php?year=2021&layergroup=Roads> (Accessed on Dec 2, 2021).

Greenemeier, L. (2015). Human Traffickers Caught on Hidden Internet. *Scientific American*. February 8. available at: <https://www.scientificamerican.com/article/human-traffickers-caught-on-hidden-internet/> (Accessed on Jan 20, 2022).

Houston Permitting Center. (n.d.). *Human Trafficking Prevention: Hotel Employee Training*. available at: <https://www.houstonpermittingcenter.org/human-trafficking-prevention>. (Accessed on January 12, 2022).

“Know the Signs.” n.d. ECPAT-USA. available at: <https://www.ecpatusa.org/know-the-signs> (Accessed on Jan. 29, 2022).

Inman, James Willians (1835) *Navigation and Nautical Astronomy: For the Use of British Seamen* (3 ed.). London, UK: W. Woodward, C. & J. Rivington. P. 155-159. available at: https://books.google.com/books?id=MK8PAAAAYAAJ&printsec=frontcover&source=gbs_ge_summary_r&cad=0#v=onepage&q&f=false (Accessed on Jan. 24, 2022).

Lashley, Conrad (2020). *Slavery and Liberation in Hotels, Restaurants and Bars*. United Kingdom: Routledge.

Leung, Xi Y., Y. Yang, E. A. Dubin (2018) What are guests scared of? Crime-related hotel experiences and fear of crime. *Journal of Travel & Tourism Marketing*. Volume 35(8):1071-1086.

McLaurin, M. (2017) “Human trafficking conference scheduled at UNCP”. available at: <https://www.yourdailyjournal.com/news/62284/human-trafficking-conference-scheduled-at-uncp> (Accessed on Jan. 29, 2022).

Megginson, David (2021) OurAirports. available at: <https://ourairports.com/countries/US/> (Accessed on Dec. 25, 2021)

Mletzko, Deborah, Lucia Summers, Ashley N. Arnio (2018) Spatial patterns of urban sex trafficking. *Journal of Criminal Justice*. Volume 58 (Sept-Oct 2018): 87-96.

National Human Trafficking Hotline (2021) 2020 National Hotline Annual Report. available at: <https://humantraffickinghotline.org/resources/2020-national-hotline-annual-report> (Accessed Jan. 30, 2022).

Paraskevas, Alexandros. 2018. Human trafficking in hotels: an "invisible threat for a vulnerable industry. *International Journal of Contemporary Hospitality Management*. 30(3): 1996-2014. doi:10.1108/IJCHM-04-2017-0213.

Paraskevas, Alexandros. (2020). “Human Trafficking and Modern Slavery in Europe’s hotels” In: C. Lashley (Ed). *Slavery and Liberation in hotels restaurants and bars*, Oxford: Routledge. ISBN: 978-0367424664.

Paraskevas, A., & Brookes, M. (2018). Nodes, guardians and signs: Raising barriers to human trafficking in the tourism industry. *Tourism Management*, 67, 147–156.

Polaris. (2018). *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking: Hotels and Motels*. available at: <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Hotels-and-Motels.pdf> (Accessed Jan. 25, 2022).

Prevent Human Trafficking in the Hospitality Industry (n.d.) available at: <https://health.baltimorecity.gov/prevent-human-trafficking-hospitality-industry>, (Accessed on January 30, 2022).

- Prylinski, Kirsten M. (July 2020) Tech Trafficking: How The Internet Has Transformed Sex Trafficking. *Journal of High Technology Law*. Vol. 20 No. 2.
- Ross, L. N. (2021). Making a Declaration: The Rise of Declaratory Judgment Actions and the Insurer as Regulator in the Fight to End Sex Trafficking in the Hotel Industry. *Loyola of Los Angeles Law Review*, 54 (3), 843-880.
- Rothberg, R. (2019). Risky Business: Holding Hotels Accountable for Sex Trafficking. *Yale Law & Policy Review*, 38(1), 265–321.
- Sagduyu, C. (2020). Nightmare in Shangri-La: Consequences likely for entities who benefit from human trafficking. Trafficking Matters. available at: <https://www.traffickingmatters.com/nightmare-in-shangri-la-consequences-likely-for-entities-who-benefit-from-human-trafficking> (Accessed on Jan. 29, 2022).
- Sarkisian, M. (2015). Adopting the code: Human trafficking and the hospitality industry. *Cornell Hospitality Report*, 15(15), 3-10.
- Shelley, Louise (2010) *Human Trafficking: A Global Perspective*. New York and Cambridge: Cambridge University Press.
- Soloway, T. E. & B. T. Mohler (2021) Expert Opinion: The Proliferation of Human Trafficking Lawsuits in the Hotel Industry. *New York Law Journal*. available at: <https://www.law.com/newyorklawjournal/2021/11/17/the-proliferation-of-human-trafficking-lawsuits-in-the-hotel-industry/?slreturn=20220011043358> (Accessed on Dec. 22, 2021).
- Spinks, R. (2020). *Opening Closed Doors: Can Hotels Do More to Fight Human Trafficking?* Skift. January 23. available at: <https://skift.com/2020/01/23/opening-closed-doors-can-hotels-do-more-to-fight-human-trafficking/> (Accessed Jan. 29, 2022).
- U.S. Census Bureau (2021) 2019 American Community Survey (ACS), 1-Year. National Family Week: November 21-27. 1-Year Estimates. Release Number CB21-SFS. 154. available at: <https://data.census.gov/cedsci/table?t=Income%20and%20Poverty&y=2019> (Accessed on Jan. 19, 2021).
- Weisburd, D. 2015. The Law of Crime Concentration and The Criminology of Place. *Criminology* 53 (2): 133–57.
- Weisburd, D, A. A. Braga, E R. Groff, and A. Wooditch (2017) Can Hotspots Policing Reduce Crime in Urban Areas? An Agent-Based Simulation *Criminology* . 55 (1): 137–173.

William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, Pub. L. No. 110-457, 122 Stat. 5044. (2008) available at: <https://www.govinfo.gov/content/kg/STATUTE-122/pdf/STATUTE-122-Pg5044.pdf> (Accessed January 24, 2022).

Wingfield, Nancy M. (2011) Destination: Alexandria, Buenos Aires, Constantinople; "White Slavers" in late imperial Austria. *Journal of the History of Sexuality*. 20(2): 291-311.