

CORPORATE LIABILITY OF HOTELS: CRIMINAL SANCTIONS FOR ONLINE SEX TRAFFICKING

By Lauren R. Shapiro

The success of sex trafficking—a \$99 billion dollar industry—is attributed to the concomitant growth of technology with increased use of social media that allows traffickers to locate both potential victims and buyers quickly and on a large scale.¹ Sexual predators use social media platforms, chat rooms, websites, and messaging apps as recruitment tools—simultaneously contacting vulnerable people, typically children and women—in a process of grooming that involves building trust and emotional connections in the relationship before luring them into meeting.² The acts of using the Internet to entice minors for the purpose of sexual activity have been criminalized under 18 U.S.C. §2422(b). Once the victim is with the trafficker, the next phase is to gain submission from the victim through force, manipulation, and/or deceit for the purpose of being sexually exploited by the trafficker. Traffickers use hotels for housing their trafficking victims and as venues for their commercial sex business (both in-calls and out-calls), often

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including the name and address of hotels in the online ads.³ At least 75% of victims reported being advertised online and sold multiple times per day as the Internet environment allows buyers to easily ‘order’ and pay for specific sex acts.⁴

ANTI-TRAFFICKING LEGISLATION

By 2000, the United States and the rest of the world decided to take legal action against human trafficking. In accordance with the 2000 United Nations Transnational Organized Crime Protocol II to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (aka UN Palermo Protocol),⁵ trafficking was internationally defined in Article 3 (a) as including three elements:

- (1) the act (*recruitment, transportation, transfer, harboring, or receipt of persons*),
- (2) the means (*threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person*), and
- (3) the purpose (*exploitation, including, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs*).

Two weeks before the Palermo Protocol was finalized, the United States enacted the Trafficking Victims Protection Act of 2000 (TVPA, Title 18 Sec. 112 Chapter 77). Although its purpose was to criminalize sex trafficking, since its passage the number of prosecutions ending in convictions were low⁶ and mandatory restitution was rarely awarded.⁷ To handle some of the inadequacies and expand the original scope to cover newly learned aspects of this crime, amendments and reauthorizations (TVPRA) were enacted multiple times from 2003 through 2020.⁸ The 2003 reauthorization categorized trafficking under RICO, mandated annual reports to congress, and provided a civil remedy for victims to allow recovery of damages and attorney fees [§1595(a)], but required the plaintiff to wait until after the pendency

of the criminal action [(b)(1)].⁹ The 2008 reauthorization provided *criminalized obstruction* into trafficking and added *facilitator liability* for those who indirectly but knowingly profited from the venture in reckless disregard to use of force, fraud, and coercion against the victim.¹⁰ The latter provided a stronger mechanism for corporations to be held liable, as will be discussed subsequently. The Justice for Victims of Trafficking Act (JVTA) of 2015 added to TVPRA §1591(a) the acts of *patronizing* and *soliciting* and the means of *advertising*; amended §1594 to direct assets forfeited for the victim restitution order; and created a mandatory \$5000 per convicted person or entity to support trafficking victim services. Examination of restitution awarded by federal courts, however, shows that this amendment has not been implemented properly by prosecutors and/or judges. The award rate reported in 2012 before this revision was 36% and afterwards in 2017 and again in 2018 was 27%.¹¹

Four sections of TVPA (with TVPRA changes in bold) relevant to this article are:

U.S.C. § 1590 made the following acts illegal: “Whoever knowingly recruits, harbors, transports, provides, or obtains by any means, any person for labor or services of this chapter.”

U.S.C. § 1591 further prohibited the trafficking [acts] involving children and the traffickers’ use of force, fraud, or coercion [means] in:

- (a) *Whoever knowingly—(1) in or affecting interstate commerce, recruits, entices, harbors, transports, provides, obtains, **patronizes**, or **solicits** of a person; or (2) benefits, financially or by receiving anything of value, **from participation in a venture** which has engaged in an act described in violation of paragraph (1), knowing that force, fraud, or coercion described in subsection (c)(2) will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).*¹²

U.S.C. §1593 provided a mechanism by which the Court could give mandatory restitution to

the victim-survivor—to ease the transition from bondage to freedom, with the understanding that there were emotional, social, educational/vocational, mental and physical health costs of being trafficking:

- (a) *Notwithstanding section 3663 or 3663A, and in addition to any other civil or criminal penalties authorized by law, the court shall order restitution for any offense under this chapter.*
- (b) (1) *The order of restitution under this section shall direct the defendant to pay the victim (through the appropriate court mechanism) the full amount of the victim’s losses, as determined by the court under paragraph (3) of this subsection.*

U.S.C. § 1594 provided a mechanism by which the Court could direct forfeited assets for the mandatory restitution.

- (d) *The court, in imposing sentence on any person convicted of a violation of this chapter, shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that such person shall forfeit to the United States—*

- (1) *such person’s interest in any property, real or personal, that **was involved in**, used, or intended to be used to commit or to facilitate the commission of such violation, and any **property traceable to such property**; and*
- (2) *any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.*
- (e) (1) *The following shall be subject to forfeiture to the United States and no property right shall exist in them:*
- (A) *Any property, real or personal, **involved in**, used, or intended to be used to commit or to facilitate the commission of any violation*

of this chapter, and **any property traceable** to such property.

(B) Any property, real or personal, which constitutes or is derived from proceeds traceable to any violation of this chapter.

(f) Transfer of Forfeited Assets.—

(1) **In general.—** Notwithstanding any other provision of law, the Attorney General shall transfer assets forfeited pursuant to this section, or the proceeds derived from the sale thereof, to satisfy victim restitution orders arising from violations of this chapter.

(2) **Priority.—** Transfers pursuant to paragraph (1) shall have priority over any other claims to the assets or their proceeds.

(3) **Use of nonforfeited assets.—** Transfers pursuant to paragraph (1) shall not reduce or otherwise mitigate the obligation of a person convicted of a violation of this chapter to satisfy the full amount of a restitution order through the use of non-forfeited assets or to reimburse the Attorney General for the value of assets or proceeds transferred under this subsection through the use of nonforfeited assets.

CORPORATE LIABILITY

The hospitality sector—in particular, hotel/motel companies or property management companies as corporate entities—through their agents contribute either intentionally or negligently to harboring sex trafficking victims who are forced to engage in commercial sex acts.¹³ It would not be necessary for a corporation without direct participation to be held criminally liable under 18 U.S.C. § 1595(a)'s beneficiary theory, so long as it can be shown that it: a.) had knowledge or should have known sex trafficking occurred on site; b.) had knowledge or reckless disregard that the trafficked individual was a minor or was subjected to force, fraud, or coercion; and c.) benefited from sex trafficking.

Consistent with 18 U.S.C. § 1591(a)(1), the hotel employee does not have to be the personal implementor of “force, fraud, and coercion against a victim” to be deemed guilty of sex trafficking.¹⁴ Instead, the act of renting the room to the trafficker—either knowing or in reckless disregard of the fact that force, threat of force, fraud, or coercion was being used as the method for the adult victim to engage in commercial sex—satisfies the “harboring” act. In regard to a child victim engaging in commercial sex, the employee would be able through a “reasonable opportunity to observe” that the victim was a minor.¹⁵ As a corporate entity, the hotel would be criminally liable through §1591(a)(1) if it benefits financially from renting rooms to sex traffickers, victims, or buyers such that the venture results in criminal violation of §1591. Moreover, the hotel through U.S.C. §1593 should be asked by the Court to provide remuneration to victims, which would reduce the need for victims to implement civil suits.¹⁶ A hotel, as a corporate entity, would not be able to claim that it had no knowledge of its employee's actions because the 2003 version of the TVPRA contains the phrase: “which that person knew or should have known has engaged in an act of violation of this chapter.”

Corporations have been held criminally liable for the criminal acts of their agents acting under their authority since 1901 as established through *US v. New York Central and Hudson River R. Co* (212 U.S. 509).

According to the U.S. Supreme Court:

We see no reason why a corporation cannot be imputed with the knowledge of unlawful conduct by its agents acting within the scope of their designated authority, which actions accrue to the profit of the corporation. It is well established that corporations may, as a corporate entity, be held responsible for damages in a torts action. In these cases, liability is not imputed to the corporation because it itself participated in the tortuous conduct, but because the tortuous conduct was done for the benefit of the corporation.

Moreover, U.S. law applies the broadest and most encompassing model of corporate criminal liability, the *respondeat superior doctrine* (a variation of the *vicarious liability doctrine*; *Pettit Grain & Potato Co. v. N. Pac. Ry. Co.*).¹⁷ The *respondeat superior doctrine* determines the corporation is liable for the deeds of

its agents and employees (*State v. Wohlsol, Inc.*),¹⁸ regardless of rank within the corporation hierarchy, if (a) they acted in the course and within the scope of their employment, and having the authority to act for the corporation with respect to the corporate business that was conducted criminally; (b) the agents acted, at least in part, with the intent to advance the business interests of the corporation; and (c) the criminal acts were authorized, tolerated, or ratified by the corporate management.¹⁹

The employees in the hospitality industry are uniquely positioned to identify sex trafficking victims and to recognize the signs of commercial sex exploitation by traffickers.²⁰ According to Polaris, 75% of sex trafficking victim-survivors reported that they used hotels; however, 94% of them indicated that hotel staff never identified them as victims, showed concern, or gave assistance.²¹ Indicators for front desk staff include patrons pay for rooms in cash or pre-paid card, absence of luggage particularly for stays involving multiple days, no identification for women, and minors present during school hours or late at night.²² Other hotel staff, including housekeeping and room service, should be aware when repeated requests for extra towels and linens are made while cleaning services are refused; multiple visitors loitering in the hallway outside room doors and frequently entering and leaving rooms; presence of a large number of sexually-related items (e.g., condoms and lubricants); and extended stay guests have few/no personal possessions; guest exhibit the following—restricted communication with others, fear, malnourishment, fatigue, poor hygiene, physical abuse, no control over possessions (e.g., phone, ID, money), anxiety, submissive behavior, disorientation, disheveled appearance, inappropriate dress for age and weather, and do not leave the room unmonitored.²³ Not surprisingly, many of the behaviors listed above are the same as those included in recent civil suits against hotels as evidence that hotels “should have known,” but which clearly demonstrates that the hospitality industry has done little to interrupt trafficking activities.

Therefore, prosecutors must consider pressing criminal charges against private-sector corporate involvement of hotels in sex trafficking. The first attempt by the U.S. to hold corporations liable involved Gayatri Investments, LLC, which owned and operated Oceanside Travelodge motel; the manager, Vinod Patel and his son Hitesh were charged

with conspiracy as a result of sex and drug trafficking conducted by 35 gang members on the premises.²⁴ The government stated its intention to request the hotel be forfeited, but in 2012 the case against the corporation and the manager’s son was dismissed.²⁵ Next in 2015, the U.S. filed a civil suit against a N.C. Red Roof Inn that had been used as a venue for child sex-trafficking (and felony drug crimes), but settled the case instead, forcing the owners to sell the property and pay \$175,000 penalty.²⁶ Then *U.S. v. Bhimani et al.* became the first case in which a hotel, as a corporate entity, was criminally charged in 2017 and then convicted of sex trafficking (and drug trafficking) offenses in 2020 for knowingly benefitting financially and from participation in a trafficking venture on hotel grounds.²⁷ Accomplices to the offense of trafficking (i.e., aiding and abetting, conspiracy) are also guilty of this crime.²⁸ It should be noted that three of the eight gang members found guilty of sex trafficking received 17.5-, 20-, and 33-year prison sentences.²⁹

A typology containing four differing levels of involvement—corporate defendants, active contributors, passive participants, and involuntary participants, originally developed to explain labor trafficking, may be employed to understand the roles hotels and their employees play as harbors of sex trafficking.³⁰

The *U.S. v. Bhimani et al.* case is used to explain the four levels of corporate liability for the sex trafficking offenses.³¹

1. *Corporate defendants* play both initiating and coordinating roles in trafficking.

The Howard Johnson Hotel, and the general manager, Bhimani, were convicted of 18 U.S.C. §§ 2; 1591(a)(1), (a)(2), and (b)(1)—aiding and abetting sex trafficking by force and coercion and of 18 U.S.C. § 1594(c)—sex trafficking by force and coercion conspiracy. As the general manager, Bhimani had authority and control in the Howard Johnson Motel (e.g., hiring, firing) and his confessed criminal actions were within the scope of his employment (see *U.S. v. Riley*).³² He (and by extension the hotel) provided the venue (rooms) for sex trafficking knowing that the payments were the product of criminal activity. Bhimani forced the victims, whom he knew were being subjected to violence, to have sex with him;

when asked by the mother of a minor being sex trafficked at the hotel if she was present he denied it, which prevented the child's removal; and obstructed police investigation by allowing traffickers to use false names and warned them when the police were in the building.

2. *Active contributors* become gradually aware and then actively engaged in trafficking activity and its associated fraudulent, coercive or forceful recruitment and exploitation through their direct and frequent interactions with sellers and victims.

Hassam, the Vice President of Om Sri Sai—which owned the Howard Johnson Hotel, was found guilty of 18 U.S.C. § 1594(c). Like Hassam, at least two employees sexually assaulted the victims³³; however, it was unclear if they were also charged.

3. *Passive participants* become aware at some level that trafficking and/or exploitative activities are occurring through peripheral information, but do not actively contribute to the crime.

The investigators determined that other employees of the Howard Johnson Hotel were aware that sex trafficking occurred there and failed to help the victims or notify the police.³⁴ These employees benefited from the sex trafficking operation through their salaries, which was possible due to the hotel's involvement in the sex (and drug) trafficking, but were not charged. Additionally, the local police classified the hotel as 'high drug crime area.'

4. *Involuntary participants* are the least aware of trafficking/exploitive activities, but are connected through shared economic or social interactions, such as franchisors or corporate brand owners.

As the corporate owner of Howard Johnson Hotels, Wyndham Hotel Group could have been prosecuted in this case (but it was not). According to the Wyndham Group, it worked with Polaris in 2014 to develop comprehensive training and educational tools for owners, franchisees, property-level staff and employees to learn about trafficking. Despite this claim, it was clear that the

Howard Johnson Hotel where most of the sex (and drug) trafficking activities in this case occurred between 2014 and 2017 had not complied with this directive.

CRIMINAL SANCTIONS AGAINST HOSPITALITY CORPORATIONS

The past 20 years has shown that the TVPA, as the main anti-sex trafficking legislation, and attempts to enforce it has thus far have made minimal impact, as evidenced by the paucity of successful convictions in comparison to arrests.³⁵ Hospitality, as one of four private sector service providers—the other three include finance, transportation, and communication—shares a complex legal-illegal involvement with online commercial sex exploitation and sex trafficking that results in corporate liability. According to Polaris, traffickers use banks to deposit and launder their earnings; planes, buses and taxi services to transport their victims; hotel rooms to conduct their sex trafficking business and lodging of victims; and, social media platforms to recruit victims and advertise their services. Until recently, corporations have not been considered the main target of sex trafficking, yet they are as much the beneficiaries as are the traffickers and buyers.³⁶

The private sector's assistance is needed to disrupt sex trafficking, but their cooperation has been minimal at best—even when they implement policies—such as the 1998 *Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism* (e.g., posters, training of employees on identifying signs of human trafficking, reporting trafficking),³⁷ there is little oversight of parent companies over their franchised hotels determining whether “required” policies were being enacted. As indicated in the previous section, Wyndham failed to ensure that their franchise, Howard Johnson Hotel, had implemented their company's required training program. In the face of 125 civil cases recently launched against them in 2019 under TVPRA of 2008 §1595(a),³⁸ corporate brand owners have submitted that they should not be held accountable for sex trafficking occurring at individual hotels because they did have “actual knowledge” of its occurrence. Owners, however, have “exercise of an ongoing and systematic right of control over [their branded hotels]” and receive royalties for room rentals.

As such, the Courts have ruled that they “knew or should have known sex trafficking occurred,” such as *B.N. v. Wyndham Hotels & Resorts, Inc.* and *A.B. v. Marriott Int’l, Inc.*³⁹ Hilton and Marriott indicated that they had put policies in place to prevent trafficking since the allegations against them occurred, but the hospitality industry has demonstrated willful blindness to their corporate responsibility’s to disrupt trafficking for 20 years.⁴⁰ Thus, criminal sanctions under §1591 against hospitality corporations harboring traffickers and their victims are needed to incentivize actual and effective anti-trafficking responses from the hospitality industry (*e.g.*, mandated training, monitoring, and accountability reports).⁴¹

Case in point, there are no criminal consequences (or financial incentives) when hotels fail to enforce Connecticut’s 2016 Public Act No. 16-71.⁴² The bill was proposed in response to the large number of underage sex trafficking victims being referred to the Department of Children and Families and the inability of prosecutors to successfully charge even one trafficker with this felony crime.⁴³ The original bill aimed to regulate the role that lodging properties had in sex trafficking by banning hourly room rates, requiring six-month policy on record keeping, and mandating employee awareness training. The actual legislation did not include enforcement, financial, or regulatory measures needed for it to be successful in helping to combat sex trafficking, such as charging owners with a Class A misdemeanor if they failed to train their employees in identifying trafficking by the 2017 deadline (many have not); allocating funding for the training initiative to incentivize hotels and pay instructors; or assigning a government body to verify compliance by all properties.⁴⁴

CONCLUSION

The only way to combat the complex crime of domestic sex trafficking is to foster the partnership of the private sector in hospitality with law enforcement. To enforce the TVPRA mandate—prosecute, protect, and prevent trafficking,⁴⁵ a carrot-and-stick paradigm must be implemented. The carrot method (similar to what the *Earn it Act 2020* does for Internet service providers) would entail providing criminal immunity when hotels show that they have a policy in which employees are given mandated training by

professionals in trafficking, monitoring their employees’ ability to implement what they learned, and demonstrate their accountability through yearly reports.⁴⁶ Based on the hospitality industry’s past failure to oversee their own policies, the carrot method should not be considered the first option.

The stick method of holding hotel corporations criminally liable produces three main benefits.⁴⁷ First, the corporations profiting from victims’ misery should repay both the individuals who were directly victimized and society which was indirectly victimized by online commercial sexual exploitation and trafficking. Currently, criminal suits under TVPA provide little, if any, financial restitution to victims (U.S.C. §1593, §1594),⁴⁸ forcing victim-survivors to seek relief through long, drawn-out and expensive civil suits that cannot begin until after the criminal case is completed (U.S.C. §1595(b)). In 2019, only 38% of the 176 defendants convicted of sex trafficking were ordered to pay victim restitution to the 226 victims (ranging from \$80 to \$2,055,860, totaling \$9,831,625) and 19% paid the \$5000 special assessment.⁴⁹ Each girl or woman being sex trafficked is estimated to earn \$100,000 per year.⁵⁰ Even more disconcerting is the fact few victims have actually received court-ordered restitution. Only \$987 of the \$4,018,988 (.025%) in court-ordered restitution from 2015 and \$257,499 of the \$9,166,689 (2.8%) from 2016 has been paid.⁵¹ As for society, trafficking pulls at the threads of social cohesion, therefore it is important to show that entities contributing to the violation of human rights will be penalized. Additionally, when restitution is not forthcoming, the victims’ reliance on society increases in terms of health care and financial support. The courts are currently burdened with both criminal and civil cases from trafficking. If the main mechanism for restitution is derived from criminal cases, then the need for civil ones is greatly reduced.

Second, corporations held criminally liable for trafficking would be given the proper incentive to reform and rehabilitate. Courts can use corporate liability statutes to fine, dissolve, reorganize, suspend, or close businesses found to be guilty in aiding sex trafficking.⁵² In some cases, imposing fines and firing employees directly involved may be sufficient, in other cases the corporation may need to be reorganized or sold, with sale of the hotel forfeited for the

victim restitution. The corporate brand owners must be held to a high standard of oversight, one in which it ensures that training provided to employees aimed at identification of sex trafficked persons and policies for how to respond must be assessed periodically to determine whether it is being enacted.

Third, deterrence for corporations will only occur if wrongful conduct—that is, encouraging, failing to prevent, and/or allowing by turning-a-blind-eye to sex trafficking—is punished.⁵³ Prosecution sends the message to the hospitality industry that pretending ignorance when it indirectly profits from sex trafficking is no longer possible. The recent precedent case, *U.S. v. Bhimani et al.*, will become a guide for future prosecutors to hold hotels criminally liable and is likely the impetus needed for the hospitality industry to truly become engaged in combating sex trafficking.

NOTES

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2. Polaris Project. (2018). *Roadmap for systems and industries to prevent and disrupt human trafficking*. A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking.pdf (polarisproject.org); Leary, M.G. (2014). Fighting fire with fire: Technology in child sex trafficking. *Duke Journal of Gender Law & Policy*, 21(2), p.289+.
3. In-calls refer to buyers of commercial sex acts coming to the hotel where the trafficking victim was held, whereas out-calls refer to the victim going to the hotel where the buyer was a guest.
4. Thorn. (2018). *Survivor insights: The role of technology in domestic minor sex trafficking*. https://www.thorn.org/wp-content/uploads/2018/06/Thorn_Survivor_Insights_061118.pdf.
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7. Human Rights First (2017) *Supra* 1; Murphy, C. (2018). *Human trafficking legal center publishes 2019 restitution report*. <https://www.traffickingmatters.com/human-trafficking-legal-center-publishes-2018-restitution-report/>.
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9. *Ibid.*
10. Ross, L.R. (2020). A look at Florida's legislative response to holding hotels civilly liable for “turning a blind eye” to the sex trafficking monster hiding behind closed doors. *New York University Journal of Legislation and Public Policy*, 22 (2), 375–420.
11. Murphy (2018), *Supra* 7.
12. According to the TVPA, 18 U.S.C. § 1591(a), defines sex trafficking as “to cause the person to engage in a commercial sex act,” which is “any sex act, on account of which, anything of value is given to or received by any person” (18 U.S.C. § 1591(a) (e)(3)).
13. Schumann, S. (2020). Corporate criminal liability on human trafficking. In J. Winterdyk & J. Jones (eds.), *The Palgrave International Handbook of Human Trafficking* (pp. 1651–69). Palgrave Macmillan, Cham. https://doi.10.1007/978-3-319-63058-8_10; Sullivan, Jr. W.M., Leonardi, F., Johnson, D.C., & Hafeez, S.J. (2018). Human trafficking raises corporate liability concerns for the hospitality industry. <https://www.pillsburylaw.com/en/news-and-insights/human-trafficking-raises-corporate-liability-concerns-for-the-hospitality-industry.html>.
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16. Pierce, S.C. (2011). Turning a blind eye: US corporate involvement in modern day slavery. *Journal of Gender Race & Justice*, 14, 577–600.
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23. *Ibid.*
24. *U.S. v. Hitesh Vinod Patel, Gayatri Investments, LLC*, Criminal Case No. 11CR1448-MMA.
25. *Ibid.*
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28. *Supra* 7.
29. Department of Justice (2020). *Owner and general manager of Pocono area hotels convicted of sex and drug trafficking in precedent setting case*. <https://www.justice.gov/usao-mdpa/pr/owner-and-general-manager-pocono-area-hotels-convicted-sex-and-drug-trafficking>.
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31. *Ibid*.
32. 621 F.3d 312, 338 (3d Cir. 2010).
33. *Supra* 13.
34. *Supra* 13.
35. Farrell et al. (2014), *Supra* 6.
36. *Supra* 7.
37. The Code was developed by End Child Prostitution, Child Pornography, and Trafficking of Children for Sexual Purposes (ECPAT) to help the tourism industry combat child trafficking; Shelly, L., & Bain, C. (2015). Human trafficking: Fighting the illicit economy with the legitimate economy. *Social Inclusion*, 3(1), 140–44. <https://doi.org/10.17645/si.v3i1.215>.
38. *An individual who is a victim of a violation of this chapter 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 attorney's fees; The William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, PL 110–457, 2008, 122 Stat 5044, extended the 2003 civil remedy against traffickers to include those who facilitated trafficking ventures, without directly trafficking victims.*
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