



AMERICAN
GAMING
ASSOCIATION®

Preventing and Combating

*Human Trafficking
in the Gaming Industry*





Contents

01	Introduction
03	Defining Human Trafficking
05	Anti-Trafficking Laws & Enforcement
10	How Gaming Operations May Be Used in Trafficking
11	Best Practices for Preventing and Responding to Trafficking at Gaming Operations
18	Conclusion
19	Appendix A: Enforcement Authorities
22	Appendix B: Anti-Trafficking Resources
23	End Notes

Introduction

Human trafficking, with an estimated 25 million global victims annually, is a pervasive human rights offense and a form of modern day slavery. It is one of the most profitable forms of transnational organized crime with far-reaching impacts. Traffickers do not discriminate as to where they operate—human trafficking has been reported in all 50 states—and can also be family members or known to their victims.

Traffickers take advantage of legitimate industries and supply chains to find, exploit and traffic victims. This is especially true for the travel and tourism industry—including casino gaming—when properties are unwittingly used to facilitate criminal activity. Human trafficking may be linked to other illegal enterprises such as narcotics or firearms trafficking, terrorist organizations and money laundering.

Eradicating human trafficking is a complex process that requires government, law enforcement, business and the public to work together on proactive solutions that identify traffickers, address underlying causes of these crimes, and provide support for victims. The gaming industry plays an important role in combating anti-human trafficking.

We have a moral and legal obligation to ensure that our customers and employees are in a safe environment acting of their own free will and to take meaningful steps to identify and prevent human trafficking. Awareness, due diligence and training are critical to protecting vulnerable individuals and keeping criminal activities out of our industry.

We have a moral and legal obligation to ensure that our customers and employees are in a safe environment acting of their own free will and to take meaningful steps to identify and prevent human trafficking.

Many gaming companies already have robust anti-human trafficking programs. American Gaming Association (AGA) members' commitments include property signage and employee trainings, partnerships with shelters and nonprofits, and working with law enforcement. This is in keeping with the gaming industry's long-standing commitment to compliance and upholding our responsibility to our customers, employees and the communities in which we operate.

THE AGA'S GUIDE TO PREVENTING AND COMBATING HUMAN TRAFFICKING IN THE GAMING INDUSTRY REFLECTS OUR INDUSTRY'S STANDING COMMITMENTS AND PROVIDES TOOLS TO:



EDUCATE

individuals on what constitutes human trafficking and the risks it poses to the gaming industry.



EMPOWER

gaming employees to act when they notice human trafficking.



PREVENT

human trafficking from occurring at—or being facilitated through—gaming operations.



ADDRESS

the specific needs of gaming executives as they institute anti-trafficking policies.



PROTECT

patrons and employees from the effects of human trafficking.

This guide is not intended to be a checklist of actions required of every casino and should not be applied arbitrarily to any individual situation or on a blanket basis. Moreover, in some instances, industry practices may go beyond a legal requirement established by statute or regulation.

The goal of this document is to provide a resource for the gaming industry, community partners and law enforcement to help guide their efforts to combat human trafficking. This guide will be periodically updated to keep current with changes in red flag indicators and state and federal laws.

We thank our partners in this effort in the public and private sectors. We are especially grateful for the leadership from the American Hotel and Lodging Association, Truckers Against Trafficking and U.S. Departments of Homeland Security, Justice and Treasury.

Defining Human Trafficking

Key to addressing human trafficking is understanding the issue. The following provides definitions and background on what constitutes human trafficking and the gaming industry’s role in combating it.

SEX TRAFFICKING

Sex trafficking is when a minor is induced to engage in a commercial sex act, or when a person of any age is induced to engage in a commercial sex act using force, fraud, or coercion.¹ Sex trafficking victims may appear similar to voluntary sex workers. That makes it especially important for gaming employees to be vigilant and engaged when it comes to recognizing the signs of trafficking.

The United States is often considered a “destination” country for trafficking, as victims may be lured to the U.S. with false promises of stability, economic opportunity or immigration status. After arrival, victims may find themselves under the control of a trafficker who then uses that control to coerce commercial sex acts for the trafficker’s profit. Hospitality venues like casinos are used by traffickers to set up and conduct meetings or seek out potential buyers.

Most of the victims of sex trafficking are women and young girls; however, men and young boys also find themselves in these coercive scenarios and should not be overlooked. Other particularly vulnerable groups that face a disproportionately high risk of being trafficked include American Indians and Alaska Natives, individuals experiencing homelessness, individuals in unstable financial situations, individuals struggling with substance dependency, LGBTQ+ individuals, and undocumented persons.

Most of the victims of sex trafficking are women and young girls; however, men and young boys also find themselves in these coercive scenarios and should not be overlooked.

SEX TRAFFICKING MYTHS AND REALITIES

Below are some common myths about sex trafficking, along with the reality of the circumstances surrounding modern sex trafficking.

MYTH	REALITY
<i>Maybe “escorts” do business in the hotel, but that’s not the same thing as sex trafficking.</i>	“Escort” services are often trafficking operations. Just because you don’t see a trafficker doesn’t mean that the “escort” is there voluntarily.
<i>All victims of sex trafficking are women and girls.</i>	While women and girls make up most sex trafficking victims, men and boys are also victims. LGBTQ+ men and youth are considered especially vulnerable.
<i>Minors can engage in commercial sex without it being considered trafficking.</i>	Any and all commercial sex work involving a minor is considered trafficking under federal law. Commercial sex involving an adult is considered trafficking if it involves fraud, force, or coercion.
<i>Trafficking victims always “dress risqué.”</i>	Trafficking victims do not have one uniform look or “style.” Different trafficking operations may cater to different clientele, who prefer victims to be dressed in different ways. There is no single look that defines a trafficking victim.
<i>All sex trafficking schemes exhibit the same warning signs.</i>	Each trafficking situation presents its own circumstances and issues; some people may not be ready to self-identify as victims or seek help. That is why it is crucial to understand the warning signs and have a robust plan in place to respond to potential trafficking incidents.

FORCED LABOR

Federal law defines forced labor as obtaining labor or services by force, threat of force, fraud or coercion. Even threatening legal action to pressure someone to work or perform services can be considered illegal. In addition to the trafficker, individuals and businesses that knowingly benefit from a forced labor scheme may also be punished under the law and sued civilly.² Labor trafficking may be present within an internal workforce, contracted workforce or supply chain. Many labor trafficking victims enter the U.S. on temporary work visas granted through a subcontractor or staffing agency only to be exploited when they arrive.

.....

Some people may not be ready to self-identify as victims or seek help. That is why it is crucial to understand the warning signs and have a robust plan in place.

.....

Anti-Trafficking Laws & Enforcement

There are several statutes regarding human trafficking. The stiff penalties allowed under criminal and civil statutes show the priority placed on these prosecutions by the federal government. It is important to understand these legal requirements, as they extend beyond the traffickers themselves. Casinos and other businesses that benefit, financially or otherwise, from trafficking operations are at risk of being held liable in civil cases brought by victims. See Appendix B for a list of federal and state enforcement agencies.

FEDERAL CRIMINAL LAW

SEX TRAFFICKING³

It is a crime to cause a person to engage in a commercial sex act by means of force, fraud or coercion. The law does not require an element of force, fraud or coercion if the victim is under the age of 18. Knowledge of the victim’s age is not required as long as a defendant had a “reasonable opportunity to observe” the person trafficked.

Enforcement of this section is not limited to traffickers. Anyone who knowingly “recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means” a person to engage in a commercial sex act may be prosecuted, as well as anyone who benefits financially from participating in a venture engaged in trafficking. This law is broad enough to cover a casino that harbors a sex trafficking operation where the casino should have known of the trafficking and made money from the operation, although enforcement against such establishments is rare at the federal level.

Depending on the circumstances, sex trafficking carries a minimum sentence of 10 or 15 years and a maximum of life in prison.⁴

Depending on the circumstances, sex trafficking carries a minimum sentence of 10 or 15 years and a maximum of life in prison.⁴

FORCED LABOR⁵

Forced labor under federal law is knowingly “providing or obtaining the labor or services” of anyone through force or coercion. In particular, the statute covers both actual and threatened force, including actual or threatened physical restraint. Coercion can be through “the abuse or threatened abuse of law or legal process,” such as when threats to call immigration authorities are made to cause someone to work or continue working.

Anyone found in violation of forced labor laws can be fined or imprisoned for up to 20 years, or up to life in prison if the offense also involved actual or attempted kidnapping or sexual abuse of the victim.

CIVIL LIABILITY UNDER FEDERAL LAW

Federal law allows sex or labor trafficking victims to file a civil action against anyone who “knowingly benefits” from a trafficking operation, even if there was no prosecution of the trafficker.⁶ A business can “knowingly benefit” by receiving financial benefits or “anything of value” from the trafficking operation if the business “knew or should have known” that there was illegal trafficking occurring. Financial benefit could be as simple as accepting payment for the room fee.

In recent years, this statute has been leveraged to bring civil actions against a variety of different commercial entities. Cases against hotels have survived challenges where the hotel merely should have known that it was renting rooms to people engaged in sex trafficking; no actual knowledge is required.⁷ Victims displaying “red flags” of human trafficking to hotel employees has been enough evidence to allow cases to move forward.⁸ The law allows a victim of trafficking to recover both compensatory and punitive damages—a successful suit can result in a seven-figure judgment.⁹

.....
The law allows a victim of trafficking to recover both compensatory and punitive damages—a successful suit can result in a seven-figure judgment.⁹
.....

THE STATE TRAFFICKING LAWS

STATE LAWS COMBATING HUMAN TRAFFICKING							
	Hotel Signage Laws	Sex Trafficking Provision	Labor Trafficking Provision	Asset Forfeiture & Investigative Tools	Training or Human Trafficking Task Force	Victim Assistance Laws	Access to Civil Damages
Alabama		X	X	X	X	X	X
Alaska		X	X	X			X
Arizona		X	X	X		X	
Arkansas		X	X	X	X	X	X
California	X	X	X	X	X	X	X
Colorado		X	X	X	X		X
Connecticut	X	X	X	X	X	X	X
D.C.		X	X	X		X	X
Delaware		X	X	X	X	X	X
Florida	X	X	X	X	X	X	X
Idaho		X	X	X	X	X	
Illinois	X	X	X	X		X	X
Indiana		X	X	X	X	X	X
Iowa		X	X	X	X		
Kansas	X	X	X	X	X	X	
Louisiana	X	X	X	X	X	X	X
Maine	X	X	X	X			X
Maryland	X	X	X	X			
Massachusetts	X	X	X	X	X	X	X
Michigan	X	X	X	X			
Minnesota	X	X	X	X	X	X	X
Mississippi		X	X	X	X	X	X

THE STATE TRAFFICKING LAWS

	STATE LAW COMBATING HUMAN TRAFFICKING						
	Hotel Signage Laws	Sex Trafficking Provision	Labor Trafficking Provision	Asset Forfeiture & Investigative Tools	Training or Human Trafficking Task Force	Victim Assistance Laws	Access to Civil Damages
Missouri		X	X	X	X	X	X
Montana	X	X	X				
Nebraska	X	X	X	X	X	X	
Nevada		X	X	X	X	X	X
New Hampshire		X	X	X		X	X
New Jersey	X	X	X	X	X	X	X
New Mexico	X	X	X		X	X	X
New York	X	X	X	X	X	X	
North Carolina	X	X	X	X	X	X	
North Dakota		X	X	X		X	
Ohio	X	X	X	X	X	X	X
Oklahoma		X	X	X		X	X
Oregon		X	X	X	X	X	X
Pennsylvania		X	X	X		X	X
Rhode Island		X	X	X	X		
South Dakota		X	X	X		X	X
Tennessee	X	X	X	X	X	X	X
Texas	X	X	X	X	X	X	X
Washington	X	X	X	X	X	X	X
West Virginia	X	X	X		X		X
Wisconsin	X	X	X	X			X
Wyoming		X	X		X	X	

How Gaming Operations May Be Used in Trafficking

Gaming operations have been used to facilitate human trafficking. In particular, physical casinos or resorts can be locations for actual trafficking to take place, while casinos and online gaming apps can be used to launder money related to trafficking operations.

- Casinos and hotels can be optimal environments for human trafficking, especially if the property allows for cash payments, does not require ID checks, or similarly lacks security procedures that would make trafficking more difficult. Hospitality employees have been reported as acting as middlemen in setting up trafficked individuals with buyers. In these scenarios, the trafficker may pay the casino employee a cut. This may be done while at work or when off the clock.
- Online gaming apps with chat functions may also be used by traffickers to recruit victims.
- Major events, such as championship games, music festivals, trade shows or conferences have resulted in increases in sex trafficking. The increase in demand and patronage at properties requires casino employees to be extra vigilant during these events.
- Casinos may be exploited by traffickers to launder their proceeds through the exchange of money for chips, and the use of online accounts to receive payment for commercial sex.

Best Practices for Preventing and Responding to Trafficking at Gaming Operations

ADOPT AN ORGANIZATION-WIDE ANTI-TRAFFICKING POLICY

A clear, uniform, organization-wide anti-trafficking policy is an essential aspect of every gaming organization's efforts to prevent human trafficking. All staff—from the entry-level positions to the c-suite—should be familiar with their responsibilities related to recognizing and reporting signs of trafficking.

Training should be mandatory for all personnel, available in all employee languages, and incorporate these essential steps: education, observation, communication and escalation. It is beneficial to provide specific anti-human trafficking training to front of house employees that have a higher likelihood of observing trafficking victims during their shifts, including security, table dealers, bartenders, valet, concierge and front desk staff.

Safe, secure and centralized reporting mechanisms are crucial to the success of anti-trafficking programs. Managers or security staff should be adequately trained on receiving these reports and directing them to the appropriate state, tribal, or federal authorities. In the case of an immediate emergency, the police or other appropriate emergency services should be contacted.

In the case of forced labor, organizations should commit to identifying areas that may pose trafficking risks, develop policies prohibiting human trafficking within their supply chain and contracted labor, and work with vendors to ensure their compliance. In-house or third-party analysts can help identify areas of risk within a company and with partners.

.....

Training should be mandatory for all personnel, available in all employee languages, and incorporate these essential steps: education, observation, communication and escalation.

.....

RESPONSE PLAN

Gaming entities should develop a plan for responding to and reporting suspected human trafficking incidents. Although every response plan will need to be customized based on the organization and its location, comprehensive plans address:

- All the various ways in which trafficking might take place: within the customer base, workforce, any contracted or subcontracted workforce or supply chains.
- How to properly respond and which government or law enforcement agencies should be involved. This may differ depending on the area of operations that the trafficking affects.
- Trafficking no matter where it occurs by creating tailored approaches.
- When and how to reach out to local trafficking victim assistance groups; National Human Trafficking Hotline; and local, tribal, state and/or federal law enforcement.
- Internal goals and metrics to track effectiveness of anti-human trafficking policies.

In particular, some victims may not immediately respond to assistance and be resistant. In those cases, local anti-trafficking organizations may be the most effective route for assistance, and it is essential that they are integrated into the company's response plan.

The gaming establishment should ensure that all employees are adequately trained on the resources available so that they can ensure victims who do seek help are treated with compassion and directed towards the resources and services they need.

Many survivors and practitioners agree that involving law enforcement and/or the National Human Trafficking Hotline is an essential step if the potential victim is suspected to be a minor.

Importantly, plans should ensure employees engage local hotlines or law enforcement and do not approach or confront suspected traffickers, especially when victims are present.

.....

Plans should ensure employees engage local hotlines or law enforcement and do not approach or confront suspected traffickers, especially when victims are present.

.....

EMPLOYEE TRAININGS

Organizations should provide and mandate regular training on preventing and responding to human trafficking for all employees within a gaming operation.

EMPLOYEE TRAINING SHOULD FOCUS ON:



EDUCATION

Employees should be educated about human trafficking, including any current local news reports that illustrate the kinds of trafficking operations in the area.



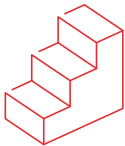
OBSERVATION

Employees should be trained to observe and spot potential warning signs of human trafficking.



COMMUNICATION

Employees should be provided with the tools to communicate about trafficking and, if necessary, with trafficking victims.



ESCALATION

Employees should feel empowered to escalate any concerns they have regarding a potential instance of human trafficking to a supervisor or manager.

See Appendix B for organizations that offer training programs.

INDICATIONS OF HUMAN TRAFFICKING

Gaming employees should be aware of different warning signs that could indicate human trafficking. One indicator does not necessarily equate to trafficking, but it is important to be aware of red flag indicators that include but are not limited to:

- Signs of abuse (verbal or physical).
- Signs of poor hygiene, malnourishment or fatigue.
- Fearful, anxious or submissive behavior.
- Victims are not allowed to control their cell phone, ID, hotel key or money.
- Guests overly concerned about surveillance or security on premises, avoiding interactions with security personnel or the sightlines of cameras or scoping out the perimeter of the casino floor.
- Victims approaching buyers who they do not seem to know, appear inebriated or are winning big at gaming tables.
- Individuals or groups making recurring and frequent trips between the casino floor and hotel rooms.
- Rooms booked for large numbers of people and/or rooms booked in the name of guests with a local address.
- Victims meeting with their trafficker between hotel rooms and the casino floor.
- Excessive requests for sheets and/or towels.
- Multiple individuals going in and out of one room.
- Victims speaking in a scripted, repetitive manner. Refusing to cooperate with security or floor personnel when approached, or giving evasive or non-responsive answers to questions.
- Victims of similar age, ethnicity, tattoos or dress accompanied by a trafficker.
- Victims who appear unfamiliar with casinos, seem unsure of how games work, where to congregate or floor rules. Conversely, victims may also frequent the casino and are intimately aware of how the operation runs, show aggressive behavior in response to questions, or flee at the first sign of security or law enforcement personnel.
- Traffickers monitoring or controlling the movements of a victim or using hand signals to communicate.
- Multiple visits to the property by the potential victim with multiple different buyers.
- Disparity in age between victim and buyer.
- Traffickers dropping off or picking up victims multiple times, or waiting onsite at parking structures, facility exits or drop off locations to meet victims.

Conclusion

The AGA and the gaming industry are committed to combating human trafficking in all its forms. This guide provides important information so that gaming companies can assess their current programs and policies, identify gaps and address them. By educating employees and guests about its most common indicators, and by working with law enforcement and other partners, casinos can and will make an impact in eradicating this form of modern-day slavery.

The AGA extends its appreciation to the members of the AGA Anti-Human Trafficking Task Force for their ongoing work to highlight this issue and elevate industry efforts to combat it.

Appendix A: Enforcement Authorities

Engaging with law enforcement is a key component to combating human trafficking. Establishing open lines of communication, creating relationships and building trust with law enforcement before any potential trafficking takes place can help bring swift action and protect victims more effectively.

FEDERAL ENFORCEMENT

There are several federal agencies tasked with enforcing anti-trafficking laws:

- The Department of Justice (DOJ). The Human Trafficking Prosecution Unit within the DOJ sets federal policy regarding trafficking prosecutions and supports U.S. Attorney's Offices with major cases.
- United States Attorney's Office (USAO). Every federal judicial district has a USAO tasked with prosecuting federal crimes within that jurisdiction. A district's USAO will spearhead investigations and prosecutions of any human trafficking occurring within that district.
- Federal Bureau of Investigation (FBI). The FBI is tasked with investigating federal crimes, including trafficking. The FBI will generally oversee any investigation focused on a domestic trafficking ring.
- Drug Enforcement Authority (DEA). Human trafficking and drug trafficking can sometimes be carried out through a central criminal organization or gang. The DEA can be involved in any investigation in which a human trafficking operation also involves an element of drug trafficking.
- Department of Homeland Security (DHS). DHS has several units that oversee immigration, such as Customs & Border Patrol (CBP), Immigration & Customs Enforcement (ICE) and Homeland Security Investigations (HSI). These agencies are often called on to investigate international trafficking rings, as well as to assist undocumented immigrant victims. HSI partnered with the gaming industry on their Cornerstone project to combat human trafficking and money laundering. DHS also established the Blue Campaign, partnering with several states, to educate the public on indicators of human trafficking.
- Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Criminal organizations involved in human trafficking may also traffic in illegal firearms or other regulated goods. The ATF can be involved in investigating those criminal organizations where there is overlap.

STATE ENFORCEMENT

All states have their own agencies focused on trafficking and many have a specific task force dedicated to preventing human trafficking.

STATE	STATE ENFORCEMENT AGENCIES & RESOURCES
Alabama	Local law enforcement, Attorney General's Office , Alabama Anti-Human Trafficking Alliance
Alaska	Local law enforcement
Arizona	City/County Task Forces, Attorney General's Office , Arizona Human Trafficking Counsel
Arkansas	Attorney General's Office
California	Local law enforcement, Attorney General's Office
Colorado	Colorado Bureau of Investigation , Colorado Human Trafficking Council
Connecticut	Human Anti-trafficking Response Team (minors)
D.C.	D.C. Human Trafficking Task Force , U.S. Attorney's Office , Attorney General's Office
Delaware	Attorney General's Office
Florida	Department of Health , Attorney General's Office
Idaho	Criminal Intelligence Center , State Department of Education
Illinois	Local/County Human Trafficking Task Forces, Department of Human Services
Indiana	Attorney General's Office , Indiana Protection for Abused and Trafficked Humans (IPATH) , Indiana Youth Services Association
Iowa	Iowa Office to Combat Human Trafficking , Iowa Department of Public Safety
Kansas	Attorney General's Office , Human Trafficking Advisory Board
Louisiana	Department of Children and Family Services
Maine	Attorney General's Office
Maryland	U.S. Attorney's Office
Massachusetts	Human Trafficking Division - Attorney General's Office , Office of Public Safety and Security
Michigan	Attorney General's Office , Human Trafficking Commission
Minnesota	Bureau of Criminal Apprehension , Department of Transportation
Mississippi	Bureau of Investigation of Human Trafficking , State Department of Health
Missouri	Attorney General's Office , Department of Public Safety
Montana	Department of Justice

STATE ENFORCEMENT

STATE	STATE ENFORCEMENT AGENCIES & RESOURCES
Nebraska	Department of Health and Human Services , Attorney General's Office - Human Trafficking Task Force
Nevada	City and County Law Enforcement and Task Force Resources , Attorney General's Office
New Hampshire	Coalition Against Domestic & Sexual Violence , Human Trafficking Collaborative Task Force
New Jersey	Human Trafficking Task Force - Department of Community Affairs , Attorney General's Office , Department of Education
New Mexico	Attorney General's Office , Human Trafficking Task Force
New York	Division of Criminal Justice Services , Department of Health , Office of Children and Family Services
North Carolina	Department of Administration , Judicial Branch Human Trafficking Commission
North Dakota	Attorney General's Office , State and Local Intelligence Center , Human Trafficking Task Force
Ohio	Human Trafficking Task Force , Attorney General's Office , Department of Education
Oklahoma	Bureau of Narcotics and Dangerous Drugs Control
Oregon	Department of Justice Crime Victim and Survivor Services , Liquor and Cannabis Commission
Pennsylvania	Pennsylvania Office of Victim Services , Department of Transportation , Department of Human Services
Rhode Island	Local Law Enforcement , U.S. Attorney's Office
South Dakota	Department of Public Safety
Tennessee	Bureau of Investigation
Texas	Attorney General's Office , Health and Human Services , Department of Family and Protective Services
Washington	Attorney General's Office , Department of Commerce & Office of Crime Victim's Advocacy
West Virginia	Human Trafficking Task Force , Emergency Management Division
Wisconsin	Department of Justice , Department of Children and Families
Wyoming	Wyoming Coalition Against Domestic Violence and Sexual Assault

Appendix B: Anti-Trafficking Resources

U.S. NATIONAL HUMAN TRAFFICKING HOTLINE

HUMANTRAFFICKINGHOTLINE.ORG

help@humantraffickinghotline.org

(888) 373-7888

Text “BeFree” to 233733

POLARIS

POLARISPROJECT.ORG

info@polarisproject.org

(202) 790-6300

HUMAN TRAFFICKING LEGAL CENTER

HTLEGALCENTER.ORG

info@htlegalcenter.org

(202) 849-5708

ECPAT-USA

ECPATUSA.ORG

info@ecpatusa.org

(718) 935-9192

NATIONAL CENTER FOR MISSING AND EXPLOITED

CHILDREN

MISSINGKIDS.ORG

1-800-THE-LOST (1-800-843-5678)

Report child sexual exploitation online at CyberTipline.org.

**FOR TRAINING VIDEOS, SAMPLE POLICIES,
SIGNAGE AND MORE RESOURCES:**

TRUCKERS AGAINST TRAFFICKING

**AMERICAN HOTEL AND LODGING ASSOCIATION
FOUNDATION**

[No Room for Trafficking](#)

NATIONAL INDIAN GAMING COMMISSION

[Human Trafficking Resources](#)

**THE SAMARITAN WOMEN INSTITUTE FOR SHELTER
CARE**

[National Shelter Landscape Map](#)

End Notes

- ¹ 18 U.S.C. § 1591; 22 U.S.C. § 7102.
- ² 18 U.S.C. §§ 1589, 1595.
- ³ 18 U.S.C. § 1591.
- ⁴ Sex trafficking of a minor who is at least 14 years old carries a sentence of 10 years to life imprisonment. Sex trafficking of a minor under the age of 14, or by force, fraud, or coercion carries a sentence of 15 years to life imprisonment. 15 U.S.C. §1591.
- ⁵ 18 U.S.C. §§ 1589-90.
- ⁶ 18 U.S.C. § 1595.
- ⁷ *S.J. v. Choice Hotels Int'l, Inc.*, 473 F. Supp. 3d 147, 154 (E.D.N.Y. 2020); *M.A. v. Wyndham Hotels & Resorts, Inc.*, 425 F. Supp. 3d 959, 970 (S.D. Ohio 2019) (“‘Participation’ under § 1595 does not require actual knowledge [or] participation in the sex trafficking itself.”).
- ⁸ *S.Y. v. Wyndham Hotels & Resorts, Inc.*, No. 2:20-CV-632-JES-MRM, 2021 WL 765568, at *5 (M.D. Fla. Feb. 26, 2021).
- ⁹ *Abafita v. Aldukhan*, 2019 WL 4409472, at *3 (S.D.N.Y. Sept. 16, 2019).
- ¹⁰ The most recent resource is FinCEN’s [Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity](#).
- ¹¹ 19 U.S.C. § 1307.

