

LAWYER'S MANUAL ON HUMAN TRAFFICKING

PURSUING JUSTICE FOR VICTIMS

EDITED BY JILL LAURIE GOODMAN AND DORCHEN A. LEIDHOLDT



SUPREME COURT OF THE STATE OF NEW YORK, APPELLATE DIVISION, FIRST DEPARTMENT • NEW YORK STATE JUDICIAL COMMITTEE ON WOMEN IN THE COURTS

What We Know About Human Trafficking: Research and Resources

by Jill Laurie Goodman

Creating a comprehensive portrait of human trafficking is a difficult undertaking.

Identifying traffickers, trafficking operations, and victims is an initial and major obstacle. Trafficking is an underground activity, intentionally hidden from outside eyes. Victims rarely break free, and, when they do, they are often too wary of authorities or too traumatized by their experiences to be able or willing to describe publicly or even privately what happened to them. Researchers have relatively small data bases from which to work, and the cases on which they depend inevitably reflect the biases of their sources, including those of laws and law enforcement. The many guises of human trafficking and the numerous cultures within which it flourishes complicate the work of researchers further. Trafficking can be found in virtually every inhabited corner of the globe. It can take place within the borders of a single nation, state, or city, or it may involve transit through, and exploitation within, multiple countries or regions. Researchers also must contend with conflicting definitions of trafficking, which vary in fundamental ways from jurisdiction to jurisdiction and nation to nation. As a result, different studies of trafficking invariably examine different populations, making comparisons among findings difficult.

Nonetheless, a fair number of reports, books, and articles on human trafficking have been published in recent years, and a body of knowledge is developing.¹ Some scholars extrapolate from known cases to develop estimates about the extent of trafficking, while others summarize information about a limited number of uncovered instances of trafficking. From these kinds of work, a portrait emerges of a phenomenon, both local and global, that ultimately bears responsibility for massive violations of human rights and immense amounts of human suffering.

The Extent of Global Trafficking

Understanding the Reach of Human Trafficking

The United States Department of State issues yearly reports that document in rich detail the kinds of trafficking within, into, from, and through over 170 countries.² The individual country descriptions provide data points demonstrating that human trafficking is common and that it takes many forms throughout the world. For example, addressing trafficking in some fairly remote places, the State Department's Trafficking in Persons Report for 2009 finds that women and girls in Sierra Leone are trafficked internally for forced labor in fishing, diamond mining, and agriculture as well as begging and low-level street crime.³ Men and boys in Mali are part of a tradition of debt bondage in salt mines.⁴ Women and girls from Nepal and Bangladesh are trafficked to India into the commercial sex industry, and low-status and poor Indian women and children are trafficked internally for forced marriages as well as other kinds of sexual exploitation.⁵ Cambodian children are transported to Thailand and Vietnam where they are made to beg, sell flowers, or shine shoes, while the sale of virgins to sex tourists visiting Cambodia thrives on fees of \$800 to \$4,000 per purchase.⁶ Brazil's children are trafficked internally for sexual exploitation in resorts, along highways, and in Amazonian mining brothels.⁷

Developed countries too are part of the trafficking underworld described in the State Department reports. Australian men marry foreign women and then force them into prostitution or domestic servitude.⁸ Moroccan men are lured to Italy where they are forced to sell drugs.⁹ St. Petersburg and Moscow are destinations for Russian, Ukrainian, and Moldavian children used for sexual exploitation and begging.¹⁰ Men are trafficked into Belgium for exploitation in restaurants, bars, sweatshops, fruit farms, and construction.¹¹ Mongolian victims are found in Germany, Switzerland, the United Arab Emirates, and Israel, while South Korean and Japanese men visit Mongolia as sex tourists.¹²

Closer to home, Canadian aboriginal women and girls are trafficked internally into the sex industry where they join foreign women from Asia and Eastern Europe; Canada is also a transit state for South Koreans on their way to the United States, and it is both a source country and destination for sex tourists.¹³ Mexico is a transit stop for victims from Central America, the Caribbean, Eastern Europe, and Asia destined for the United States; a source country for women and children trafficked to the United States for sexual exploitation, as well as men

and women trafficked for labor in agriculture and sweatshops; and a destination for sex tourists from the United States, Canada, and Western Europe.¹⁴

Quantifying Human Trafficking

While the Trafficking in Persons reports provide an immense amount of detailed information, gathering the various phenomena of human trafficking into a statistical portrait has proved difficult. In fact, the United Nations Office of Drugs and Crimes (UNODC), the UN body responsible for human trafficking research and programs, said in its most recent report that it is premature to make estimates of the number of global victims.¹⁵

Most attempts to quantify human trafficking begin by trying to count its victims using complicated sampling methodologies.¹⁶ The most authoritative but admittedly problematic figures on the number of global victims are the 2005 estimates of the International Labour Office (ILO), an arm of the United Nations. According to these figures, which the ILO characterized as minimums, the total number of victims of “forced labour” was 12.3 million, and the number of victims of “trafficking” was 2.45 million.¹⁷ The ILO researchers themselves viewed these estimates as more useful for stimulating discussion than for settling questions, and four years later the ILO was still struggling to find ways to provide reliable data.¹⁸ Among the problems are the ILO’s concepts of “forced labor” and “trafficking;” the ILO defines “trafficking” too narrowly to include the universe of victims covered by international, federal, or New York State definitions while the ILO’s figure for “forced labour” is too broad. Also, the ILO only counts trafficking that involves movement of victims and so discounts a substantial portion of domestic trafficking.

Nor has the United States government been able to produce satisfying numbers. The estimate of between 600,000 and 800,000 annual victims cited by the Department of State’s Trafficking in Persons Reports in 2005 and 2006 and still often cited came under harsh criticism from the United States Government Accountability Office.¹⁹ The 2009 Trafficking in Persons Report simply refers to the ILO numbers without endorsing them, and the 2010 Report relies on them as well.²⁰

Demographics of Trafficking Victims

While total figures on human trafficking remain under debate, major studies converge in their assessments of the character of known trafficking instances and victims. Estimates from the four major international sources of data on victim profiles, the U.S. government, the ILO, UNODC, and the International

Organization for Migration, agree that trafficking for sexual exploitation accounts for the greatest number of known victims.²¹ According to the ILO, which defines “trafficking” to require the transport of victims, 43% of human trafficking is for commercial sexual exploitation, 32% for labor exploitation, and 25% for mixed labor and sex trafficking.²² UNODC in its 2009 Report, using a broader and more generally accepted definition of trafficking, found that 79% of reported victims are exploited in commercial sex and 18% in forced labor.²³ United States Department of Justice figures are similar. Of United States trafficking incidents reported in 2007-08, the latest reporting period, 83% were incidents of sex trafficking and 12% were labor trafficking, with 5% designated as unknown.²⁴

While figures on the basic character of known trafficking victims and incidents are in agreement, UNODC has suggested that the available numbers on sex versus labor trafficking may mask regional differences and may miss the extent of labor trafficking.²⁵ Estimates necessarily rely, in one way or the other, on the small subset of trafficking incidents that is uncovered, which may represent an atypical sample of trafficking cases. One limited study, which examined trafficking from eight Central and South American countries into the United States across the southwestern border, found that trafficking victims for labor outnumbered sex trafficking victims.²⁶

Sources agree that an overwhelming number of reported victims are female and that women and girls are the majority of labor trafficking as well as sex trafficking victims. Female trafficking victims are not only exploited in the sex industry, but they are also used in domestic servitude and forced to work in sweatshops, restaurants, and agriculture. The ILO reported that women and girls were 98% of the victims trafficked for sexual exploitation, but also 56% of victims of labor trafficking.²⁷ UNODC’s 2009 Report documents a similar disparity: between 84% and 80% of total reported victims in the years from 2003 to 2006 were women or girls.²⁸ The disproportionate number of female victims was sufficiently noteworthy for the U.S. Department of State to devote a special section in its 2009 Trafficking in Persons Report to the gender imbalance in human trafficking.²⁹ The report ascribes the vulnerability of women to their lack of basic economic, political, and civil rights.³⁰

Children, too, are victims of trafficking in large numbers. International and federal law define trafficking as profiting from the participation of anyone under the age of 18 in commercial sex. The estimate commonly used is the UNICEF figure of more than 2,000,000 children exploited yearly in the global sex industry,³¹ but children are trafficked for more than commercial sex. They are forced to beg or commit petty crimes, used in industries such as fishing, gold mining, and brick

making, or turned into child-soldiers by rebel armies. The ILO estimates that 40% to 50% of those in its category of “forced labour” are children.³²

Trafficking Prosecutions

The United States government annually counts both worldwide and domestic trafficking prosecutions and convictions, and the numbers are woefully low. The 2010 U.S. Trafficking in Persons Report gives a worldwide figure of 5,606 prosecutions and 4,166 convictions; the number of prosecutions was lower than in 2003, the first year in which the United States reported data on global law enforcement efforts, while the number of convictions was somewhat higher.³³ For 2009, the U.S. Department of Justice’s Civil Division reported charges brought against 114 individuals and 47 convictions in 43 cases (22 sex trafficking cases and 21 labor cases).³⁴ In addition, the Justice Department reports separate law enforcement figures for cases of child sexual exploitation; in 2009, there were 151 convictions and 306 children were identified through the joint federal and state law enforcement efforts.³⁵ The experiences under New York State’s Human Trafficking Law are consistent with the low figures for international and national efforts. In the first two years since New York’s law went into effect on November 1, 2007, New York had almost no prosecutions or convictions.³⁶

Trafficking Operations

A number of recent studies that focus on a particular location or kind of trafficking go beyond the numbers to bring trafficking to life. Researchers have examined in some detail women trafficked into the United Kingdom;³⁷ women trafficked in the European Union;³⁸ sex trafficking of women in the Ukraine;³⁹ child sex trafficking in Asia;⁴⁰ sex trafficking in Minnesota⁴¹ and, in a separate study, the sexual exploitation of American Indians in Minnesota;⁴² domestic sex trafficking in the Midwest;⁴³ domestic sex trafficking in Chicago;⁴⁴ commercial sexual exploitation of girls in Atlanta;⁴⁵ trafficking in the Ohio cities of Toledo and Akron;⁴⁶ sexual exploitation of children in the United States, Canada, and Mexico;⁴⁷ and trafficking of foreign nationals into the United States.⁴⁸ Often these researchers start with a set of cases identified from law enforcement sources, social service agencies, or newspaper accounts. Their data is based on examinations of public documents and case files as well as interviews with survivors, social workers, health providers, police, public officials, and others whose work touches on trafficking or who encounter its victims. Together these

studies present a plausible explanation of why trafficking happens, how it works, and the harm it visits on its victims.

Structure of Trafficking Operations

Trafficking operations vary radically in size, organization, sophistication, and global reach. On the smallest scale, traffickers may be lone pimps, exploiting one or several young girls picked up locally and seduced with promises of love, support, and security.⁴⁹ Other small exploiters are married couples, often wealthy and respected members of their communities, who find household workers abroad, arrange for their transportation, take them into their homes, and keep them in domestic servitude, often subjecting them to brutal conditions.⁵⁰

At the other extreme are complex operations, employing large cadres of people, working in different countries, involved at various different levels and stages in an integrated business.⁵¹ Human trafficking is a natural enterprise for organized crime. As one researcher explained, “[H]igh profits, low risk of detection, and minor penalties involved have made the human trade attractive to crime groups that previously trafficked in other commodities.”⁵² Classical organized crime syndicates, characterized by hierarchical structures and high levels of public corruption, are responsible for some large trafficking networks.⁵³ China and the Balkans are the most common home bases for these kinds of operations.⁵⁴ A single organization may employ specialists who find victims; transportation experts who move victims across borders, through safe houses, to ultimate destinations; business managers who organize exploitation in the profit-making enterprises; and money managers who take charge of funneling proceeds back to countries of origin, through wire transfers, couriers, and underground banking systems.⁵⁵

In between are any number of possible models with varying degrees of structure and collaboration among traffickers. Some trafficking is done through a series of independent contractors rather than as an integrated business. Recruiters may limit themselves to procuring victims and selling them to intermediaries for quick profits, a business model often found in the former Soviet Union nations.⁵⁶ Researchers documenting the operation of trafficking in the former Soviet bloc describe highly structured criminal gangs of five to thirty members who delegate recruitment, transportation, and document acquisition.⁵⁷ In Asia, brothel owners may recruit children themselves, they may delegate recruitment, or they may work through agents.⁵⁸ In some places traffickers specialize in transporting victims and take responsibility for only one leg of a multi-national journey.⁵⁹ Women in transit destined for sexual exploitation may be sold multiple times,

sometimes in markets that resemble slave auctions.⁶⁰ Loose citywide, national, or regional networks in the United States seem to support domestic traffickers and link them to broader crime rings.⁶¹ Cooperation may be limited to joining forces to discipline victims or may include transporting victims for use in prostitution for sports events or conventions.⁶² A series of entrepreneurs, who identify possible recruits, do actual recruiting, groom girls for prostitution, act as business managers in charge of victims, or keep track of victims to make sure they return after servicing johns, may work together, or a single individual may combine some or many of these functions.⁶³

Vulnerability to Traffickers

Vulnerability to Transnational Trafficking

Gender and age put people at risk for transnational trafficking, partly because of the demand for young girls and women for use in the sex industry,⁶⁴ but traffickers find that women are easy targets for labor as well as sex trafficking. A UNODC report explained that “Women are vulnerable to trafficking because they are often excluded from employment, higher education and legal as well as political parity” and they are subjected to “forms of gender-based violations, such as rape, domestic violence, and harmful traditional practices. . .that contribute to vulnerability.”⁶⁵ Age itself is a risk factor. Children, who are dependent on the adult world and subject to the authority of families, are highly vulnerable.⁶⁶ Age and gender combine to make girls particularly susceptible to trafficking. While in general trafficking victims are young, female victims are on average younger than male victims.⁶⁷

Poverty is another risk factor and among the biggest contributors to international trafficking. In general, the flow of victims in transnational trafficking is from less developed countries, usually in the global south and east, to more developed countries, usually in the north and west. Countries of origin are most likely to be the former Soviet Union nations, Southern and Eastern Europe, South America, Western Africa, and Southeast Asia, while the most likely destinations are Western Europe, North America, and Western Asia.⁶⁸ Moderate as opposed to extreme poverty seems to make populations vulnerable. While destination countries are the world’s richest, countries of origin tend to rank in the middle rather than lowest in measures of human development.⁶⁹ Nor are individuals trafficked across national borders necessarily the poorest of the poor. They are likely to be poor but not desperately poor and to have some education.⁷⁰ Often they are responsible for families and dependent children.⁷¹

Experiences that alienate people from their families or communities create fertile ground for trafficking. Childhoods marked by physical or sexual abuse, neglect, or parental substance abuse are common among international trafficking victims, and many victims were subjected to sexual abuse or raped by someone they knew before they met their recruiters.⁷² Indigenous people and ethnic minorities are vulnerable across the globe.⁷³ Migration is yet another risk factor for trafficking. As one UN official said, “Traffickers fish in the stream of migration.”⁷⁴ War, civil strife, political upheaval, and natural or environmental disasters that destroy social structures or remove people from their communities all contribute to trafficking.⁷⁵

Vulnerability to Domestic Trafficking

Gender and age also predispose victims within the United States to trafficking for commercial sex, the form of most documented domestic trafficking. Like girls and women abroad, United States victims are trafficked to meet the demand generated by customers willing to buy women and children for commercial sex, and girls in prostitution are far more likely than boys to be under the control of pimps.⁷⁶ Youth also makes individuals vulnerable. The majority of people in prostitution entered before they turned 18 years old, many well before, and any sexual exploitation of children under 18 is trafficking under federal and international law.⁷⁷

In the United States as well as abroad poverty itself is a major risk factor, and so is the kind of family dysfunction that correlates to poverty. Common among domestic sex trafficking victims are children who have run away from, or been cast out of, homes with high levels of physical abuse, sexual abuse, or neglect; often these are homes where substance abuse or domestic violence is prevalent.⁷⁸ Immigration puts people at risk within the United States as well as in other parts of the world. One researcher studying foreign national trafficking victims in the United States estimated that a third of these victims were recruited once they had entered the country rather than abroad.⁷⁹

Recruiters and Recruitment

Recruitment into trafficking is a complex process with many pathways. Violence is one method of acquiring human beings for exploitation in labor or sex markets, and some victims are abducted or kidnapped.⁸⁰ More often the process is subtle. In transnational trafficking, false promises of opportunities abroad are commonly used. Women may respond to internet or newspaper advertisements offering opportunities for marriage abroad or positions as nannies, maids, waitresses, dancers, or models, only to discover too late that the agencies

that placed the ads are fronts for sex traffickers.⁸¹ Men or women may be promised good jobs in agriculture, construction, or domestic service and find on arrival in a foreign country that the conditions of work are close to those of slavery and escape is virtually impossible.⁸²

While some recruiters are strangers, victims often know the people who serve as their initial entry into trafficking. Recruiters may be friends, relatives, or neighbors, and they may be trusted people within their communities; to victims and their families they may appear powerful and successful.⁸³ Family members themselves may be unwitting or unwitting recruiters. They may sell children outright, or they may be deceived by recruiters who tell parents that they will help with employment, education, or even adoption.⁸⁴ Women targeted for the sex trade may be wooed by charismatic recruiters posing as boyfriends, promising marriage, and providing extravagant gifts.⁸⁵

Families are found also among traffickers in domestic trafficking for commercial sex. Parents may themselves introduce children into prostitution,⁸⁶ and when they do the children are likely to be younger than those who enter the sex trade through other means.⁸⁷ Peers who are already in prostitution, living what look like glamorous lives, recruit schoolmates, friends, or even sisters.⁸⁸ Pimps looking for prospects often mask their intentions by feigning interest in the welfare of their targets. Typically, they find girls who have run away from home, often after they have been sexually abused, or whose dysfunctional families have physically or emotionally abandoned them.⁸⁹ Traffickers seek out victims at schools, shopping malls, bus stations, shelters, drop in centers, or even correctional facilities; they find victims in chat rooms online or they advertise their services as talent scouts.⁹⁰ Initially, recruiters may profess love, give their victims a place to live, and shower them with gifts of clothes or jewelry as a means of easing the transition into prostitution and creating a durable bond with victims, who are made to feel complicit in their own victimization.⁹¹ As one pimp recently told a newspaper reporter, “With young girls, you promise them heaven, they’ll follow you to hell.”⁹² A participant in a study of domestic sex trafficking related the other side of the story: “He promised me everything and better . . . Clothes, cars, house, himself. I was just looking for someone to love and love me.”⁹³

Girls and women often are important links in the recruitment process, both abroad and in the United States.⁹⁴ Women constitute a fairly large percentage of defendants in global prosecutions for trafficking.⁹⁵ In the sex trade, female recruiters and handlers are useful because they lend legitimacy to the operation. They are less threatening than male traffickers and better able to gain the trust

of victims, and they make the fact of prostitution seem less horrifying to new victims. Frequently these women and girls are themselves victims of sex trafficking who gain special privileges from those holding power over them or find an escape from prostitution by moving from exploited to exploiter.⁹⁶

Coercion and Control of Victims

The kinds of abuse traffickers use to control victims and keep them profitable have been documented by various studies of both domestic and transnational trafficking. These studies describe a fairly consistent and devastating set of tactics. Violence is at the root of traffickers' power over victims.⁹⁷ It is typically physical, brutal, and instructional. In transit and indoctrination stages, violence may be used to convince victims that their survival depends on submission to their traffickers' demands while later physical violence serves as punishment, reminds victims that they live in captivity, and acts as a means of keeping victims on edge so that they are more easily controlled.⁹⁸ Many kinds of violence are employed. One study of victims trafficked transnationally for sex and domestic servitude reported that victims were "hit, kicked, punched, struck with objects, burned, cut with knives."⁹⁹ A law enforcement officer interviewed in Ohio said that he and his fellow officers "had seen everything from pistol whipping to broken bones."¹⁰⁰ In the most extreme cases, victims are murdered.¹⁰¹ Rape is common.¹⁰² Once traffickers establish their capacity for violence, they can exercise control through threats, implicit or explicit.¹⁰³ Traffickers threaten not only victims but also their friends and families.¹⁰⁴ These threats are plausible. Traffickers often know victims' families, and victims often report having seen, or knowing about, traffickers' violence, including murder, perpetrated against other victims.¹⁰⁵

The abuse used to control victims is psychological as well as physical, and non-physical violence can be as damaging to the health, well-being, and ability of victims to function as physical violence. One scholar characterized psychological abuse in trafficking as "generally persistent, commonly extreme, and frequently perpetuated in such a way as to destroy a woman's mental and physical defences."¹⁰⁶ The forms of psychological abuse, like physical abuse, are many, varied, and designed to keep victims off balance, frightened, and in constant, debilitating states of stress. Traffickers almost always cut victims off from their family, friends, communities, and cultures.¹⁰⁷ Movement of any kind is a useful means of isolating victims psychologically as well as physically, and transporting them across the globe is particularly effective.¹⁰⁸ Victims who have been taken across multiple borders are often completely lost to family members who might try to locate them.¹⁰⁹ Once commercial exploitation begins, traffickers often keep

victims on the move, and the changes of locale can be so frequent that victims have no idea where they are.¹¹⁰ Victims are often confined by their traffickers, and their movements are restricted; they may be constantly watched and allowed outside only if closely guarded.¹¹¹ They are often prevented from calling or communicating with people they know, even when family and friends are near.¹¹² Victims exploited in prostitution are often given new identities.¹¹³ Abuse also takes the form of depriving victims of life's most basic necessities, including food, sleep, and secure shelter.¹¹⁴ Not only may victims be kept hungry and exhausted, they may be forced to live in places that are dirty, overcrowded, unsafe, or harsh.¹¹⁵ They may reside where they work, sleep in beds they use to service customers in brothels, or spend their nights on floors.¹¹⁶ Debt bondage is common, and victims who rarely see money are left without means to buy basic personal items, such as soap or tampons.¹¹⁷

Drugs and alcohol play major roles in the subjugation of trafficking victims, and in sex trafficking they are a nearly universal presence. Traffickers sometimes prey on women and children with addictions, but recruiters, particularly in the transnational trade, may prefer healthier, more attractive victims and instead introduce drugs later, as they tighten their grip on victims.¹¹⁸ Both giving drugs and withholding drugs are effective and commonly used means of maintaining control over victims.¹¹⁹ Drugs and alcohol also act as an anesthesia, dulling physical and psychic pain, making victims capable of enduring the conditions of their servitude and thus continuing to produce profits.¹²⁰

Harm

Horrific as these various kinds of abuse may each be, the sum is more damaging than the parts. Abuse that may seem random, arbitrary, or sadistic is part of a process that keeps victims compliant. Physical abuse, harsh conditions of captivity, calculated unpredictability, and intentionally inflicted trauma in the context of enforced dependency create extremely high levels of stress, and the stress itself is responsible for physiological as well as psychological damage.¹²¹ One writer, describing the effects of traffickers' psychological abuse, said of trafficking victims: "Their frame of reference for understanding the world is deeply altered . . . [and] they are left physically, emotionally, and spiritually shattered."¹²²

Systematic psychological and physical abuses by traffickers are major causes of harm to victims but not the only ones. Agricultural workers may suffer

disabilities from overwork, accidents from machinery, or poisoning from pesticides.¹²³ Victims exploited in the sex industry are at high risk for sexually transmitted diseases, including HIV and AIDS, gynecological disorders, and customer-perpetrated violence.¹²⁴ Prostitution, the fate of virtually all sex trafficking victims, is extremely dangerous in itself. One study of women in prostitution in the United States found extraordinarily high mortality rates, with a huge risk of murder in particular, often at the hands of clients and serial killers.¹²⁵ Police are among the perpetrators of violence, particularly sexual assault, against sex trafficking victims.¹²⁶

Living under conditions that one commentator likened to what is experienced by hostages, prisoners of war, or concentration camp inmates¹²⁷ creates whole constellations of symptoms. Prolonged exposures to stress induced by living in constant states of fear and deprivation produce physiological and neurological damage that affect the ability to think, remember, and respond to threats.¹²⁸ The immune system is compromised, leaving victims open to infection.¹²⁹ Exhaustion, malnutrition, and unhealthy living conditions compound the effects of other abuse and contribute to a downward spiral evident in the compromised mental and physical health of victims.¹³⁰

The long list of symptoms found among victims who have escaped confirms the potentially devastating impact of being trafficked. Authors of an important study on the health effects of trafficking concluded that their findings “are startling in the breadth and depth of the harm. . . sustained.”¹³¹ According to this study, in the first weeks post-trafficking, 57% of the victims interviewed had at least twelve physical health symptoms causing them pain or discomfort.¹³² Prominent among these were fatigue and weight loss.¹³³ Four-fifths of victims had central nervous system problems including headaches, memory difficulty, and dizzy spells, and three-fifths had gastrointestinal problems that proved persistent.¹³⁴ Over 70% of the victims reported mental health symptoms indicative of depression, anxiety, and hostility.¹³⁵ According to these researchers, “[W]omen’s psychological reactions were multiple and severe, and compare to, or exceed, symptoms experienced by torture victims.”¹³⁶ Symptoms of post-traumatic stress were common, and 56% of the victims met the clinical definition of post-traumatic stress disorder.¹³⁷

Stories

Most studies and reports on human trafficking devote space to the voices of victims and recount victims' experiences in gripping first person or third person narratives. The U.S. State Department's annual Trafficking in Persons Reports¹³⁸ and UNODC's Human Trafficking: An Overview¹³⁹ are leading examples of this approach, but studies small and large quote victims at length. Trafficking seems to strike researchers and writers as so extreme that numbers, summaries, and generalizations fall short of conveying essential truths, and the stories placed within more scholarly material may be as important for understanding human trafficking as anything else written or published.

Conclusion

The relatively new field of research in human trafficking already has produced valuable data, useful to practitioners and policy-makers alike. For example, knowing how often trafficking victims released from their captors experience memory loss, difficulty concentrating, and post-traumatic stress can inform law enforcement expectations of victims in the first days, weeks, or months after a raid or rescue. More work is needed and, no doubt, will be forthcoming, and with more information campaigns against human trafficking will be more focused and effective.

Yet a lack of complete knowledge is no excuse for inaction. We know that trafficking reaches nearly every corner of the globe, that large numbers of people find themselves under the control of traffickers, and that victims experience extreme brutality and deprivation. This is more than enough to place human trafficking high among policy priorities and establish it as a great wrong demanding immediate and sustained attention.

Notes

1. For a recent comprehensive literature review of trafficking, see Elzbieta M. Gozdziak and Micah H. Bump, *Data and Research on Human Trafficking: Bibliography of Research-Based Literature*, Institute for the Study of International Migration, Walsh School of Foreign Service, Georgetown University (2008).
2. See, e.g., United States Department of State, *The 2009 Trafficking in Persons Report* (2009) (hereinafter TIP Report 2009) and United States Department of State, *The 2010 Trafficking in Persons Report* (2010) (hereinafter TIP Report 2010).
3. TIP Report 2009, *supra* note 2, at 255.
4. *Id.* at 201.
5. *Id.* at 155.
6. *Id.* at 95.
7. *Id.* at 85.
8. *Id.* at 67.
9. *Id.* at 212.
10. *Id.* at 247.
11. *Id.* at 78.
12. *Id.* at 210.
13. *Id.* at 98-99.
14. *Id.* at 206.
15. United Nations Office on Drugs and Crime, *Global Report on Trafficking in Persons*, at 12 (Feb. 2009) (hereinafter UNODC Report 2009).
16. For technical descriptions of sampling techniques used, see Guri Tyldum et al., *Taking Stock: A Review of the Existing Research on Trafficking for Sexual Exploitation*, Fafo (2005).
17. Patrick Belser et al., *ILO Minimum Estimate of Forced Labour in the World*, International Labour Office, Geneva, at 1, 4 (April 2005) (hereinafter ILO Estimate).

18. *Id.* at iv; International Labour Office, *Global Report on Forced Labour, The Cost of Coercion*, at 11-15 (2009).
19. United States Government Accountability Office, *Human Trafficking: Better Data, Strategy, and Reporting Needed to Enhance U.S. Anti-trafficking Efforts Abroad*, Report to the Chairman, Committee on the Judiciary, and the Chairman, Committee on International Relations, House of Representatives, at 10-17 (July 2006) (*hereinafter GOA Report 2006*).
20. TIP Report 2009, *supra* note 2, at 8; TIP Report 2010, *supra* note 2, at 7 (without attribution).
21. ILO Estimate, *supra* note 17, at 4.
22. *Id.* at 5.
23. UNODC Report 2009, *supra* note 16, at 6.
24. Tracy Kyckelhahn *et al.*, *Characteristics of Suspected Human Trafficking Incidents, 2007-2008*, U.S. Department of Justice, Bureau of Statistics Special Report, at 1 (2009).
25. UNODC Report 2009, *supra* note 16, at 6, 51.
26. Heather Clawson *et al.*, *Estimating Human Trafficking Into the United States: Development of a Methodology*, A Report Submitted to the National Institute of Justice, U.S. Department of Justice (2006) (*hereinafter Clawson, Estimating Human Trafficking Into the United States*).
27. ILO Estimate, *supra* note 17, at 5-6.
28. UNODC Report 2009, *supra* note 16, at 48-49.
29. TIP Report 2009, *supra* note 2, at 36.
30. *Id.*
31. See, e.g., TIP Report 2009, *supra* note 2, at 22; and TIP Report 2010, *supra* note 2, at 12.
32. ILO Estimate, *supra* note 17, at 15.
33. TIP Report 2010, *supra* note 2, at 45. UNODC also keeps count of national figures for prosecutions and convictions. See, e.g., UNODC Report 2009, *supra* note 16, at 78-292. For U.S. figures, see UNODC Report 2009, *supra* note 16, at 136.
34. TIP Report 2010, *supra* note 2, at 339.
35. *Id.*

36. Joseph Berger, "Despite Law, Few Trafficking Arrests," *The New York Times*, Jan. 18, 2010. The first conviction under the new law did not come until February, 2010.
37. Sarah Stephen-Smith and Sarah Edwards, *Routes In, Routes Out: Quantifying the Gendered Experiences of Trafficking to the UK*, The Poppy Project (2008) (hereinafter Stephen-Smith, *Routes In, Routes Out*).
38. Cathy Zimmerman *et al.*, *Stolen Smiles: A Summary Report on the Physical and Psychological Health Consequences of Women and Adolescents Trafficked in Europe*, London School of Hygiene & Tropical Medicine (2006) (hereinafter Zimmerman, *Stolen Smiles, A Summary Report*); and Cathy Zimmerman *et al.*, *The Health Risks and Consequences of Trafficking in Women and Adolescents: Findings from a European Study*, London School of Hygiene & Tropical Medicine (2003) (hereinafter Zimmerman, *Health Consequences of Trafficking*).
39. Donna M. Hughes, *The 'Natasha' Trade: Transnational Sex Trafficking*, National Institute of Justice Journal, at 9 (Jan. 2001) (hereinafter Hughes, *The 'Natasha' Trade*); Donna M. Hughes and Tatyana A. Denisova, *Trafficking in Women From Ukraine*, research funded by the U.S. Dept. of Justice and the Ukrainian Academy of Legal Science (2002) (hereinafter Hughes, *Trafficking in Women from the Ukraine*); and Donna M. Hughes and Tatyana A. Denisova, *The Transnational Political Criminal Nexus of Trafficking in Women from the Ukraine*, Trends in Organizational Crime, Vol. 6, Nos. 3-4 (2001) (hereinafter Hughes, *The Criminal Nexus of Trafficking in Ukraine*).
40. Karen C. Tumlin, *Trafficking in Children in Asia: A Regional Overview*, An ILO-IPEC Paper (Feb. 2000) (hereinafter Tumlin, *Trafficking in Children in Asia*).
41. Advocates for Human Rights (Minneapolis), *Sex Trafficking Needs Assessment for the State of Minnesota* (Oct. 2008) (hereinafter Advocates for Human Rights, *Sex Trafficking in Minnesota*).
42. Minnesota American Indian Women's Resource Center, *Shattered Hearts: The Commercial Sexual Exploitation of American Indian Women and Girls in Minnesota* (Aug. 2009) (hereinafter Minnesota American Indian Resource Center, *Shattered Hearts*).
43. Celia Williamson and Michael Prior, *Domestic Minor Sex Trafficking: A Network of Underground Players in the Midwest*, 2 Journal of Child & Adolescent Trauma 1 (2008) (hereinafter Williamson, *Domestic Minor Sex Trafficking*).

44. Jody Raphael and Jessica Ashley, *Domestic Sex Trafficking of Chicago Women and Girls*, Illinois Criminal Justice Information Authority and DePaul University College of Law (May 2008) (*hereinafter* Raphael, *Domestic Sex Trafficking in Chicago*); Jody Raphael and Deborah Shapiro, *Sisters Speak Out: The Lives and Needs of Prostituted Women in Chicago*, A Research Study, Center for Impact Research (Aug. 2002) (*hereinafter* Raphael, *Sisters Speak Out*).
45. Alexandra Priebe and Cristen Suhr, *Hidden in Plain View: The Commercial Sexual Exploitation of Girls in Atlanta*, A Study of the Atlanta Women's Agenda (Sept. 2005) (*hereinafter* Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*).
46. Jeremy M. Wilson and Erin Dalton, *Human Trafficking in Ohio: Markets, Responses, and Considerations*, the Rand Infrastructure, Safety and Environment Program and the Ohio Association of Chiefs of Police (2007) (*hereinafter* Wilson, *Human Trafficking in Ohio*).
47. Richard J. Estes and Neil Alan Weiner, *The Commercial Sexual Exploitation of Children in the U.S., Canada and Mexico*, U.S. Department of Justice and the University of Pennsylvania School of Social Work (2002) (*hereinafter* Estes, *Commercial Sexual Exploitation of Children in U.S.*).
48. Kevin Bales and Steven Lize, *Trafficking in Persons in the United States: A Report to the National Institute of Justice* (2005) (*hereinafter* Bales, *Trafficking in the United States*).
49. For a good description of these kinds of cases, see Jessica Lustig, *The 13-Year Old Prostitute: Working Girl or Sex Slave?*, New York Magazine (April 1, 2007) (*hereinafter* Lustig, *Working Girl or Sex Slave?*).
50. For a good description of this kind of trafficking, see Elizabeth Hopper and Jose Hidalgo, *Invisible Chains: Psychological Coercion of Human Trafficking Victims*, 1 Intercultural Hum. Rts. L. Rev. 185 (2006) (*hereinafter* Hooper, *Invisible Chains*). See also Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 19, 22; TIP Report 2010, *supra* note 2, at 32 (domestic service), 38 (diplomats and domestic servitude); TIP Report 2009, *supra* note 2, at 18, 37. For the problem of diplomats keeping domestic workers in servitude, see TIP Report (2010), *supra* note 2, at 38 (global) and 338 (United States).
51. For descriptions of various kinds of organized trafficking operations, see Louise Shelley, *Trafficking in Women: The Business Model Approach*, The Brown Journal of World Affairs, Vol. X, No. 1, at 119 (Summer/Fall 2003) (*hereinafter* Shelley, *Trafficking: The Business Model Approach*); United Nations Office on Drugs and Crime, *Human Trafficking: An Overview*, at

- 24-25 (2008) (*hereinafter* UNODC Overview); and Hughes, *The 'Natasha' Trade*, *supra* note 39, at 12.
52. Shelley, *Trafficking: The Business Model Approach*, *supra* note 51, at 121.
 53. *Id.* at 123-27.
 54. *Id.*
 55. *Id.*
 56. *Id.* at 122-23; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 40; Hughes, *The Criminal Nexus of Trafficking in Ukraine*, *supra* note 39, at 6-7.
 57. Hughes, *The Criminal Nexus of Trafficking in Ukraine*, *supra* note 39, at 6. For a description of criminal organizations that take control of women once they reach Moscow, see Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 31.
 58. Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 17.
 59. Bales, *Trafficking in the United States*, *supra* note 48, at 3-4; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 40; Shelley, *Trafficking: The Business Model Approach*, *supra* note 51, at 125.
 60. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 40; Hughes, *The 'Natasha' Trade*, *supra* note 39, at 12.
 61. Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 24-26; Williamson, *Domestic Minor Sex Trafficking*, *supra* note 43, at 8; Estes, *Commercial Sexual Exploitation of Children in U.S.*, *supra* note 47, at 58.
 62. Lustig, *Working Girl or Sex Slave?*, *supra* note 49; Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 25; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 24-25.
 63. Williamson, *Domestic Minor Sex Trafficking*, *supra* note 43, at 8-11. See also Estes, *Commercial Sexual Exploitation of Children in U.S.*, *supra* note 47, at 118-24.
 64. See, e.g., TIP Report 2009, *supra* note 2, at 36; Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 13-14.
 65. UNODC Overview, *supra* note 51, at 18. See also TIP Report 2009, *supra* note 2, at 36;
 66. UNODC Overview, *supra* note 51, at 18.

67. Clawson, *Estimating Human Trafficking Into the United States*, *supra* note 26, at 18.
68. UNODC Overview, *supra* note 51, at 11.
69. *Id.* at 18.
70. UNODC Overview, *supra* note 51, at 17; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 9; Bales, *Trafficking in the United States*, *supra* note 48, at 20.
71. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 30; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 7.
72. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 31-32; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 8-9; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 10-11.
73. Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 10. For information on the risks to indigenous peoples in Canada and the United States, see Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 22-23; Minnesota American Indian Resource Center, *Shattered Hearts*, *supra* note 42, at 2, 48-50; Sarah Deer, “Relocation Revisited: Sex Trafficking of Native Women in the United States,” 621 *William Mitchell L. Rev.* 675-683 (2010).
74. Radhika Coomaraswamy, Former U.N. Special Rapporteur on Violence Against Women, United States Department of State, *The 2008 Trafficking in Persons Report* (2008) at 26 (*hereinafter* TIP Report 2008). On the role of migration, see also UNODC Overview, *supra* note 51, at 19; TIP Report 2010, *supra* note 2, at 35; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 28-29.
75. TIP Report 2009, *supra* note 2, at 31; Clawson, *Estimating Human Trafficking Into the United States*, *supra* note 26, at 17; Shelley, *Trafficking: The Business Model Approach*, *supra* note 51, at 119-23; Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 14.
76. Estes, *Commercial Sexual Exploitation of Children in U.S.*, *supra* note 47, at 58, 99-108; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 21.
77. The U.S. Federal Bureau of Investigation, looking just at children in prostitution, found that the average age at which children enter prostitution is 12 years. U.S. Department of Justice, *The Federal Bureau of Investigation's Efforts to Combat Crimes Against Children, Audit Report*

- (2009), at 68. Another study found that girls in prostitution in Atlanta had started at an average age of 14. Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 14. When women in prostitution, not just children, are canvassed, the age of entry is higher. One study that looked not at children but at women in prostitution found 83% had started at 17 or under and 33% started below the age of 15. Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 5. Another study found that 63% had entered before 18, and a third of those had been prostituted before they reached the age of 13. Minnesota American Indian Resource Center, *Shattered Hearts*, *supra* note 42, at 36-37.
78. Bales, *Trafficking in the United States*, *supra* note 48, at 21; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 22; Minnesota American Indian Resource Center, *Shattered Hearts*, *supra* note 42, at 61-63; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 14-17; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 10-16; Raphael, *Sisters Speak Out*, *supra* note 44, at 7-9; Williamson, *Domestic Minor Sex Trafficking*, *supra* note 43, at 6-8; Ian Urbina, "For Runaways, Sex Buys Survival," *The New York Times*, Oct. 27, 2009 (hereinafter Urbina, Runaways); TIP Report 2010, *supra* note 2, at 338.
 79. Bales, *Trafficking in the United States*, *supra* note 48, at 24, 29. See also Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 24; TIP Report 2010, *supra* note 2, at 338.
 80. Bales, *Trafficking in the United States*, *supra* note 48, at 27; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 18; Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 16; Williamson, *Domestic Minor Sex Trafficking*, *supra* note 43, at 6.
 81. UNODC Overview, *supra* note 51, at 11-12; TIP Report 2009, *supra* note 2, at 8-9; Bales, *Trafficking in the United States*, *supra* note 48, at 24-25; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 14-15; Hughes, *The 'Natasha' Trade*, *supra* note 39, at 11-13; Hughes, *The Criminal Nexus of Trafficking in Ukraine*, *supra* note 39, at 8-9; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 14-15; Abigail Stepnitz, *Male-ordered Bride Industry and Trafficking in Women for Sexual and Labour Exploitation*, The Poppy Project (2009), at 22.
 82. Bales, *Trafficking in the United States*, *supra* note 48, at 30; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 37-38.
 83. UNODC Overview, *supra* note 51, at 11-12; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 32; Zimmerman, *Stolen*

Smiles, A Summary Report, supra note 38, at 8; Bales, Trafficking in the United States, supra note 48, at 25-29; Hughes, The 'Natasha' Trade, supra note 39, at 11; Hughes, Trafficking in Women from the Ukraine, supra note 39, at 15; Tumlin, Trafficking in Children in Asia, supra note 40, at 16.

84. TIP Report 2009, *supra* note 2, at 7; Bales, *Trafficking in the United States, supra* note 48, at 26; Zimmerman, *Stolen Smiles, A Summary Report, supra* note 38, at 8; Tumlin, *Trafficking in Children in Asia, supra* note 40, at 16-17.
85. Zimmerman, *Health Consequences of Trafficking, supra* note 38, at 32.
86. Advocates for Human Rights, *Sex Trafficking in Minnesota, supra* note 41, at 24; Raphael, *Domestic Sex Trafficking in Chicago, supra* note 44, at 6; Minnesota American Indian Resource Center, *Shattered Hearts, supra* note 42, at 52-53; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta, supra* note 45, at 18.
87. Raphael, *Domestic Sex Trafficking in Chicago, supra* note 44, at 9.
88. Estes, *Commercial Sexual Exploitation of Children in U.S., supra* note 47, at 58; Raphael, *Domestic Sex Trafficking in Chicago, supra* note 44, at 6; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta, supra* note 45, at 18; Minnesota American Indian Resource Center, *Shattered Hearts, supra* note 42, at 51.
89. Raphael, *Domestic Sex Trafficking in Chicago, supra* note 44, at 7; Minnesota American Indian Resource Center, *Shattered Hearts, supra* note 42, at 54-55, 61; Williamson, *Domestic Minor Sex Trafficking, supra* note 43, at 6-8; Urbina, Runaways, *supra* note 78; Wilson, *Human Trafficking in Ohio, supra* note 46, at 17; Estes, *Commercial Sexual Exploitation of Children in U.S., supra* note 47, at 57-58.
90. Advocates for Human Rights, *Sex Trafficking in Minnesota, supra* note 41, at 24; Urbina, Runaways, *supra* note 78.
91. Urbina, Runaways, *supra* note 78; Advocates for Human Rights, *Sex Trafficking in Minnesota, supra* note 41, at 24; Estes, *Commercial Sexual Exploitation of Children in U.S., supra* note 47, at 58; Raphael, *Domestic Sex Trafficking in Chicago, supra* note 44, at 10-11; Wilson, *Human Trafficking in Ohio, supra* note 46, at 18; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta, supra* note 45, at 19.
92. Urbina, Runaways, *supra* note 78.

93. Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 10.
94. UNODC Overview, *supra* note 51, at 12; UNODC Report 2009, *supra* note 16, at 45-47; TIP Report 2008, *supra* note 74, at 11; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 24; Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 22-23; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 18; Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 15-16.
95. UNODC Report 2009, *supra* note 16, at 45-47.
96. TIP Report 2008, *supra* note 74, at 11; Hughes, *The 'Natasha' Trade*, *supra* note 39, at 11; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 15; Tumlin, *Trafficking in Children in Asia*, *supra* note 40, at 15; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 18.
97. Bales, *Trafficking in the United States*, *supra* note 48, at 49 (“Above all pure violence is the most powerful means traffickers used to control trafficked workers.”); Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 20-22; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 41, 45-46; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 55-56; Ian Urbina, “A Grim Tour,” *The New York Times*, Feb. 21, 2007; Hooper, *Invisible Chains*, *supra* note 50, at 198.
98. See, e.g., Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 37, 41, 46; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, 17-19, 29-31; Bales, *Trafficking in the United States*, *supra* note 48, at 49-50.
99. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 46.
100. Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 12.
101. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 46. For a number of international instances, see Hughes, *The "Natasha" Trade*, *supra* note 39, at 12.
102. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 37, 41, 47; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 10; Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 20-21; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 22; Hooper, *Invisible Chains*, *supra* note 50, at 195-96; TIP Report 2010, *supra* note 2, at 5.
103. For descriptions of how traffickers establish and exploit a capacity for violence, see Bales, *Trafficking in the United States*, *supra* note 48, at

- 51-52; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 10; Hooper, *Invisible Chains*, *supra* note 50, at 198.
104. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 52; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 11; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 22-23; Hooper, *Invisible Chains*, *supra* note 50, at 199; Shelley, *Trafficking: The Business Model Approach*, *supra* note 51, at 126.
 105. Hughes, *The "Natasha" Trade*, *supra* note 39, at 12; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 23; Hooper, *Invisible Chains*, *supra* note 50, at 200; Urbina, *A Grim Tour*, *supra* note 97.
 106. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 51.
 107. Hooper, *Invisible Chains*, *supra* note 50, at 195; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 57-58; Bales, *Trafficking in the United States*, *supra* note 48, at 30; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 19.
 108. Bales, *Trafficking in the United States*, *supra* note 48, at 47-48; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 37; Hooper, *Invisible Chains*, *supra* note 50, at 195.
 109. Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 37.
 110. Bales, *Trafficking in the United States*, *supra* note 48, at 47-48.
 111. Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 20; Bales, *Trafficking in the United States*, *supra* note 48, at 46-49; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 56-57; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 11; Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 23; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 55; Hughes, *The 'Natasha' Trade*, *supra* note 39, at 11. One study of domestic sex trafficking in Chicago found that 43% of victims said outright that they could not leave the premises on their own without fear of physical harm, and another 20% said they did not even know if they could. Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 27-28.
 112. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 57; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 27-28.
 113. Hooper, *Invisible Chains*, *supra* note 50, at 199; Lustig, *Working Girl or Sex Slave?*, *supra* note 49; Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 21.

114. Stephen-Smith, *Routes In, Routes Out*, *supra* note 37, at 23; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 39-40, 46-47; Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 12; Hooper, *Invisible Chains*, *supra* note 50, at 191-92.
115. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 63; Bales, *Trafficking in the United States*, *supra* note 48, at 42-43.
116. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 59-60; Bales, *Trafficking in the United States*, *supra* note 48, at 43-44.
117. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 59-60; Hughes, *Trafficking in Women from the Ukraine*, *supra* note 39, at 55; Bales, *Trafficking in the United States*, *supra* note 48, at 38-39, 49-50; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 26-27.
118. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 55-56; Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 10, 27; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 67-68; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 19; *see also* Melissa Farley *et al.*, *Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder*, 2 *Journal of Trauma Practice* 33, 62-63 (2003) (*hereinafter* Farley, *Posttraumatic Stress*).
119. Raphael, *Domestic Sex Trafficking in Chicago*, *supra* note 44, at 27. In a study of pimp-controlled prostitution in Chicago, 29% of the participants reported that drugs were provided to encourage addiction and 23% said that drugs were withheld as a means of coercion. *Id.*
120. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 55-56; Bales, *Trafficking in the United States*, *supra* note 48, at 44-45.
121. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 53; Hooper, *Invisible Chains*, *supra* note 50, at 200-06.
122. Hooper, *Invisible Chains*, *supra* note 50, at 200-207.
123. Bales, *Trafficking in the United States*, *supra* note 48, at 44.
124. Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 15-16; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 47-51; Advocates for Human Rights, *Sex Trafficking in Minnesota*, *supra* note 41, at 64.
125. John J. Potterat *et al.*, *Mortality in a Long-Term Open Cohort of Prostitute Women*, 159 *Am. J. Epidemiology* 778 (2004), at 782, 784. This study

found a crude mortality rate of 229 per 100,000 person years, more than ten times the rate for taxicab drivers, the most dangerous occupation in the United States. *Id.* at 783. This study also found that women in prostitution were eighteen times more likely to be murdered than other women of similar ages and races. *Id.* at 782. The results of this study confirm work done on murder rates and prostitution in Canada and the United Kingdom. *Id.* at 783-84. See also Farley, *Posttraumatic Stress*, *supra* note 118, at 33, 55-56, which found people recently or currently in prostitution reporting extremely high incidents of physical violence.

126. Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 46; Raphael, *Sisters Speak Out*, *supra* note 44, at 19-20.
127. Hooper, *Invisible Chains*, *supra* note 50, at 191-92.
128. Hooper, *Invisible Chains*, *supra* note 50, at 202-07.
129. *Id.* at 204; Zimmerman, *Health Consequences of Trafficking*, *supra* note 38, at 45-46.
130. Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 12-14; Raphael, *Sisters Speak Out*, *supra* note 44, at 27; Priebe, *Commercial Sexual Exploitation of Girls in Atlanta*, *supra* note 45, at 28-30; Wilson, *Human Trafficking in Ohio*, *supra* note 46, at 45-46.
131. Zimmerman, *Stolen Smiles, A Summary Report*, *supra* note 38, at 2.
132. *Id.* at 14.
133. *Id.* at 12.
134. *Id.*
135. *Id.* at 16-19.
136. *Id.* at 12.
137. *Id.* at 19-20. Melissa Farley and a team of researchers studied prostitution in nine countries spanning the globe and found that 68% of the sample of more than 850 interviewees currently or recently in prostitution met the clinical definition of PTSD. Farley, *Posttraumatic Stress*, *supra* note 118, at 33-34. Sex trafficking victims are likely to experience the most extreme forms of prostitution so their levels of PTSD are likely to be even higher.
138. See, e.g., TIP Report 2009, *supra* note 2; TIP Report 2010, *supra* note 2.
139. UNODC Overview, *supra* note 51.