COMBATING SEX TRAFFICKING: EXAMINING THE SPATIAL DISTRIBUTION OF HOTELS IN URBAN AREAS THAT FACILITATE SEX TRAFFICKING IN THE US[1]

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ABSTRACT

This study examines the characteristics of hotels that have become critical locales for exploiting sex trafficking victims in all regions of the United States. In recent years, almost all the hotels named in the numerous civil suits filed by victims of human trafficking in US federal courts were in urban areas. The article focuses on the attributes of the hotels where the exploitation has been documented. The hotels are analyzed in terms of their price level and rating, their spatial distribution within cities, and the neighbourhood's economic attributes. The analysis concludes that the hotels/motels are located close to major highways and airports, are primarily economy hotels, and three-quarters of named hotels are in poorer urban neighbourhoods. Yet one quarter are higher-end hotels reflecting the affluence of the customers. Strategies to address the problem are provided.

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

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Introduction

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

This insight shared by federal and state law enforcement in North Carolina reflects a significant transition in the United States, as technology has profoundly changed the urban distribution of human trafficking. Today's urban environment remains an important location for the exploitation of victims just as it was in the past (Wingfield, 2011; Shelley, 2010: 53; National Human Trafficking Hotline, 2017) even as the sex trade has moved online in the past decades. Evidence of the extent of the online sex trade is provided by a multi-million-dollar research project conducted by DARPA (Defense Advanced Projects Research Agency) of the Department of Defense. Their research conducted during two years found over $ 250 million in expenditures for over 60 million online sexual advertisements (Greenemeier, 2015). Investigations carried out using the insights from the DARPA data reveal the centrality of cities. For example, in one federally prosecuted case, the leader of the human trafficking operation based in China ran a coordinated

operation in almost 60 cities in the U.S., Canada and Australia (United States of America v. Zongtao Chen, 2018).

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

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

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

Sex traffickers prefer to use hotels or motels as the location for the sale of commercial sex rather than houses and apartments because there are certain advantages. These may include enhanced

buyer comfort, available infrastructure, affordable pricing, and an appraisal by the trafficker that the hotel is not under surveillance by law enforcement (Polaris, 2018: 18).

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

In the United States, in contrast to many countries in Western Europe, there is no legal option for individuals to sell sex except for a few counties in the state of Nevada. The crime of human trafficking is hard to prove because it involves fraud, force and coercion. (Trafficking Victims Protection Act 2000). Therefore, many cases of human trafficking are not identified or prosecuted. Initially, only a few cases were prosecuted annually, but the law's application has grown over the last twenty years. Over 2,000 federal cases have resulted in the conviction of human traffickers, the vast preponderance of these cases addressing sex rather than labour trafficking (Feehs & Currier Wheeler, 2021).

Civil remedies were made available to victims of human trafficking in the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2003 and expanded in the TVPRA of 2008 (William

Wilberforce Trafficking Victims Protection Reauthorization Act, 2008). The TVPRA passed in 2003 allowed victims to file a case in US federal courts against "whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter" (Trafficking Victims Protection Reauthorization Act (2003). This meant that victims of human trafficking could file civil cases in federal courts to sue for damages from entities that profited from facilitating human trafficking. This law was not used until 2015 by victims of human trafficking when the first civil federal sex trafficking case[5] was brought against a privately-owned motel in 2015 in Massachusetts (*Ricchio v. McLean*) (Sagduyu, 2020). This was the first federal civil case of human trafficking. This case was followed by many similar lawsuits filed against small and large hotel chains throughout the country. Since that time, over 45 claims have been filed against over 200 hotel defendants, including individual hotel owners, hotel chains and management companies. In 2019 and 2020 alone 42 federal civil sex trafficking cases were filed against a total of 189 hotel defendants (Feehs & Currier Wheeler, 2021: 55). Therefore, it is now possible to understand the attributes of the hotels named in these cases and their spatial distribution within cities.

Hotels and Sex Trafficking

There has been little scholarly research until recently on the role of hotels and motels in human trafficking in the United States. Most conducted analyses have focused on Western Europe (Paraskevas & Brookes, 2018; Paraskevas, 2020); and, more recently, the abuse of hotels in the developing world (Lashley, 2020). The topic has recently received more attention from American hospitality professionals who understood the legal and reputational challenges to the hotel industry

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

as civil suits were initiated starting in 2015 (Atkins & Lee, 2021; Sarkisian, 2015; Spinks, 2020). This analysis has been complemented by the NGO Polaris (2018) publication. The report described the role and responsibility of the hotel industry in both sex and labour trafficking. The Human Trafficking Institute provides data on the growth of federal and civil cases related to hotels under the human trafficking legislation (Feehs, K and Currier Wheeler, A. 2021). As federal civil and criminal case of human trafficking in the United States has grown, there have also been increasing legal analyses of the phenomenon. Legal scholars have analyzed the liability of hotels and their responsibility in addressing the crime of human trafficking (Fish, 2017; Ross, 2021; Rothberg, 2019).

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

Methods of Data Collection

The research presented in this article is based on both qualitative and quantitative data. One of the authors has conducted significant qualitative research on human trafficking, including corporate actors' role (Shelley, 2010; Bain &Shelley, 2015). The authors examined both criminal and civil cases to understand the correlations between the two data sources. They collected four types of data from federal civil sex trafficking case files, including hotel name, geospatial and demographic data (i.e., household income, population, and family poverty rate), and information on the kind of exploitation that went on at the hotel. The civil cases initiated against hotels provided detailed information on the types of abuse against human trafficking victims that occurred at hotels.

The data was assembled in two ways. The Human Trafficking Institute (HTI) provided the authors with a list of all federal civil trafficking cases under 18 US Criminal Code Chapter 77: Peonage, Slavery, and Trafficking in Persons, which were filed between 2015 and 2020. There were many different types of defendants in the list provided by HTI, including technology companies. The list of cases between 2015 and 2020 can be considered exhaustive according to the Human Trafficking Institute's methodology. The cases were organized by Case Year, Case Name, District Court, Case Number, Defendant Name, and Type of Entity (i.e., Hotel, Website/Online Platform, etc.). The researchers extracted each case where the "Type of Entity" was listed as "Hotel". In addition, three cases concerning hotels were filed in 2021. The authors gathered information on these locales, drawing on federal press releases, legal news sources, and Justia and LexisNexis legal databases. This added cases in six additional states (see Table 2).

The researchers retrieved the civil dockets, complaints, and amended complaints about each case from PACER (Public Access to Court Electronic Records). The allegations listed in the case

complaints and amended complaints were used as the qualitative foundation for the researchers' analysis. For the majority of cases, allegations against individual hotels could be found under the section "Factual Allegations" and the subsection "The Sex Trafficking of [victim's initials]". Therefore, it was possible to learn the name of the hotels named in the suits their locations, and further research allowed us to determine the characteristics of the neighborhood in which the hotels named were located.

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

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

Determining the proximity of the hotels and motels to highways was vital because most of the customers of the trafficking victims used cars to reach the hotels (Polaris, 2018:19-21; Feehs, Currier Wheeler, 2021:55). The authors extracted the geospatial data for interstate highways and auxiliary roads from the United States Census Bureau (Geography Division of the United States Census Bureau, 2021b). The coordinates for the major highway ramps were extracted from Google

API. Further, the approximate distance between the major highway ramps and the identified hotels was calculated by the Haversine formula (Inman, 1835), which determines distances on a sphere using latitude and longitude. To explore the air transportation hubs, the location of the international, national, and regional airports is used and extracted from OurAirports which is a free site created by a private pilot (Megginson, 2021).

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

Research Results

The hotels named in federal civil and criminal cases are a small sample of the total number of hotels implicated in the problem of human trafficking. Not every state in the United States is cited in either a federal civil or criminal case. Yet, the NGO Polaris that runs the National Human Trafficking Hotline reported that between December 2007 and December 2017, 3596 reports to the human trafficking hotline involved hotels or motels (National Human Trafficking Hotline, 2021). These hotels were located in all 50 states in the US. The reported hotels are located in each

state's large, mid-size, and small cities. Yet, the map of hotspots indicates that some are located along highways between urban locales (Polaris, 2018: 16).

The federal civil cases of human trafficking provide numerous examples of the physical abuse of trafficking victims. This abuse was not confined to lower-end hotels but also occurred in higher-end hotels[6] In the higher-end hotels, and the victims reported being slammed into walls, having a coffee pot slammed and broken on her head. As a result, there was blood all over the room from the violent assault on the victim.[7] Rape was identified in the highest-end hotel in the sample.[8] In cases, assaults on the victims were loud enough for customers to hear.[9]

Analysis of the federal civil cases revealed that hotels in many different regions of the United States were locations of sex trafficking, including the Northeast, Middle Atlantic, the South, the Midwest, and West Coast. The most significant number of named hotels were in Florida, a state with a long history of prosecuting human trafficking. One of the first prosecuted federal cases of human trafficking was the Cadena case that was initiated in 1998, even before the passage of the first federal anti-trafficking law (DOJ, 2015). The prosecution of this case required the cooperation of NGOs with law enforcement, who assisted victims who then testified against their traffickers. Therefore, Florida has a long tradition of having the infrastructure to effectively prosecute human trafficking cases by fostering cooperation with local organizations. Its distinction may explain

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[6] K.R. v. G6 Hospitality, LLC et al. 2019. United States District Court for California. 3:19-cv-08252-VC; M.A. v. Wyndham Hotels & Resorts, Inc. et al. 2019. United States District Court for Ohio. 2:19-cv-00849-ALM-EPD; C.K. v. Wyndham Hotels & Resorts, Inc. et al. 2019. United States District Court for Florida. 3:19-cv-01412-MMH-MCR

[7] C.K. v. Wyndham Hotels & Resorts, Inc. et al. 2019. United States District Court for Florida. 3:19-cv-01412-MMH-MCR

[8] Paz De La Huerta v. Harvey Weinstein et al. 2019. United States District Court for California. 2:19-cv-07682-SVW-FFM

[9] For example, A.B. v. Marriott International, Inc. 2019. United States District Court for Pennsylvania. 2:19-cv-05770-MAK.

many cases in Florida as a tourist destination. It is the second most visited state by tourists in the United States after California. Trafficking is often correlated with tourism and the hospitality industry (Cavagnaro, 2017). Therefore, it is hardly surprising that there is a strong correlation between the number of the named hotels in civil suits and the state of Florida where there have been prosecutions of human trafficking for over two decades. The second-largest number of hotels cited in civil cases were identified in Texas, the second-largest state in population after California, according to the 2020 census. A well-developed civil society is also working against human trafficking, especially in its large urban areas. This helps explain why Houston is the second city in the United States to mandate that the hundreds of hotels there provide human trafficking training for employees (Houston Permitting Center, n.d.). This training may be contributing to more significant reporting on sex trafficking in hotels.

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

States of Federal District	Number of Civil Cases	Number of Defendants	Number of Sex Trafficking Cases Related to Hotels	Number of Defendants Related to Hotels	Number of the Identified Hotels
California	10	53	5	17	16
Colorado	2	9	1	4	4
Florida	7	75	5	51	42
Georgia	9	58	6	42	14
Maine	2	2	1	2	4
Massachusetts	3	11	2	4	3
Michigan	4	22	1	2	2
Minnesota	1	2	1	2	1
New Hampshire	2	4	2	4	5
New York	26	173	2	8	3
Ohio	5	24	5	23	16

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Oregon	1	6	1	6	7
Pennsylvania	2	2	1	1	3
South Carolina	1	1	1	1	1
Texas	9	22	6	17	33
Virginia	2	3	1	1	2
Washington	2	7	2	5	7
Total	97	497	43	182	163

Table 2. Number of Sex Trafficking Cases in the US by States Retrieved from Individual Research

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

The number of hotels identified by the Polaris hotline is over 3500 (Polaris, 2018:16), but a much smaller number are named in the federal criminal and civil cases. As the data in Table I show, many of the civil cases are filed against entities other than hotels. Therefore, only a small subset of the large numbers of hotels implicated in human trafficking have actual actions taken of them. Tables 1 and 2 refer to no Federal cases involving human trafficking in North Carolina. However, as the opening of this paper reveals, serious investigations were undertaken by federal and local

law enforcement in that state to address the human trafficking in the city of Wilmington, a coastal resort area. The North Carolina cases may have been handled under drug rather than human trafficking statutes because of the convergence of the two phenomena, and therefore the hotels implicated in the trade are not present in either federal or civil cases.

The Polaris Hotline data shown below in Graph 1 reveals that the hotels associated with sex trafficking are most concentrated on the East Coast, the Gulf region of the United States, the Northern Midwest and California. Yet examining the data of the filed cases reveals that there are none in the Gulf states of Alabama, Louisiana and Mississippi and very few in the New York metropolitan area and California. This suggested discrepancy between hotline reports and the actual federal civil and criminal cases may reflect the relative capacities of law enforcement in these areas rather than the absence of associations between human trafficking and the hospitality sector. This apparent anomaly will be addressed in the Conclusion.
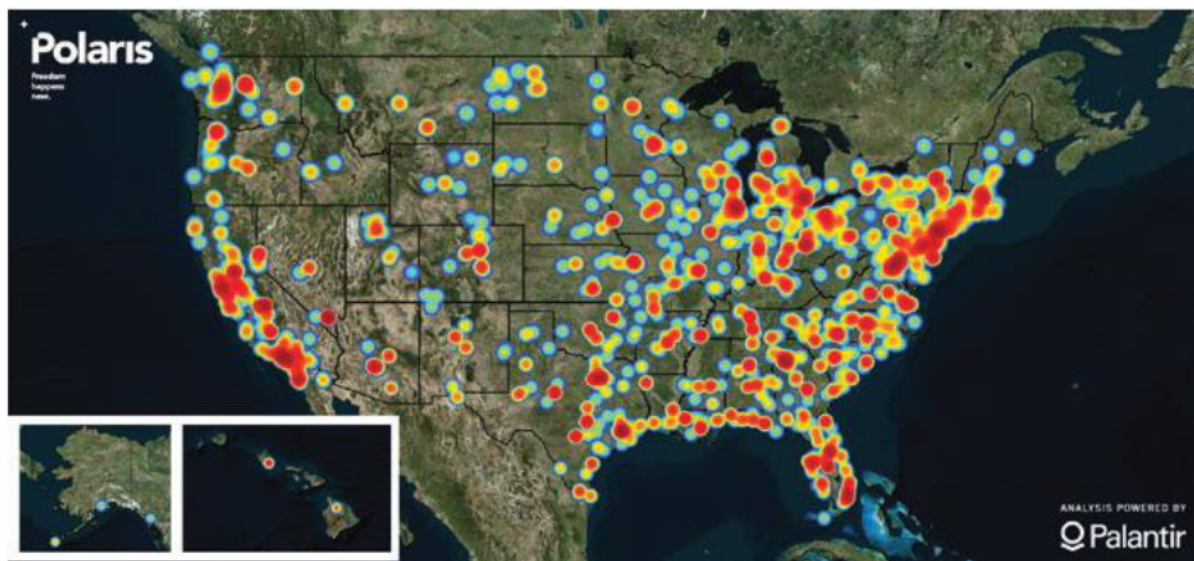
Graph 1. Locations of Potential Trafficking Cases in Hotels/Motels Reported to the Human Trafficking Hotline During 2007 to 2017 source: (Polaris, 2018: 16)

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

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

confirmed by analysis of the income levels of the zip code where the hotels named in human trafficking suits were located.

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

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

Star Rating	Number of the Identified Hotels	Ownership Types of the Identified Hotels	Brand Name of the Identified Hotels
1	15	Franchise (2), Lease & Manage (2) Privately Owned (11)	America's Best Value Inn (1), Holiday Inn (1), Motel 6 (1), Relax Inn & Suites (1), Others (11)
2	115	Franchise (92), Lease & Manage (11) Privately Owned (12)	America's Best Value Inn (2), Baymont Inn (1), Best Western (4), Budget Inn (1), Clarion Inn (1), Comfort Inn (4), Creekside Lands Inn (1), Days Inn (14), Econo Lodge (1), Economy Inn (1), Extended Stay America (2), Fairfield Inn (4), Hilltop Inn (1), Howard Johnson (6), Knights Inn (2), La Quinta (11), Microtel Inn & Suites (3), Motel 6 (12), Quality Inn (7), Ramada Inn (1), Red Roof (4), Red Roof Plus+ (1), Rodeway Inn (2), Studio 6 (3), Suburban Extended Stay (1), Super 8 (9), TownePlace Suites (1), Travelodge (2), United Inn (1), Others (12)
3	46	Franchise (42), Lease & Manage (2) Privately Owned (2)	Best Western (6), Clarion Inn, (1) Crowne Plaza (2), DoubleTree (3), Economy Inn (1), Embassy Suites (2),

			Four Points (2), Garden Inn (1), Hampton Inn (2), Hilton (2), Holiday Inn (2), Homewood Suites (1), Hyatt House/Place (2), La Quinta Inn (2), Lafayette Motel (1), Marriott (1), Quality Inn (3), Ramada Inn (2), Red Lion (1), Red Roof Plus+ (1), Residence Inn (2), Rodeway Inn (1), Sheraton (1), Staybridge Suites (1), Wingate Hotel (1), Others (2)
4	5	Franchise (5)	Crowne Plaza (1), Hyatt Regency (1), Renaissance (1), Sheraton (1), Westin (1)
5	1	Franchise (1)	Four Season (1)

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

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

Therefore, the hotels involved in sex trafficking are located in places with easy access to major interstate highways or even located next to the ramps.
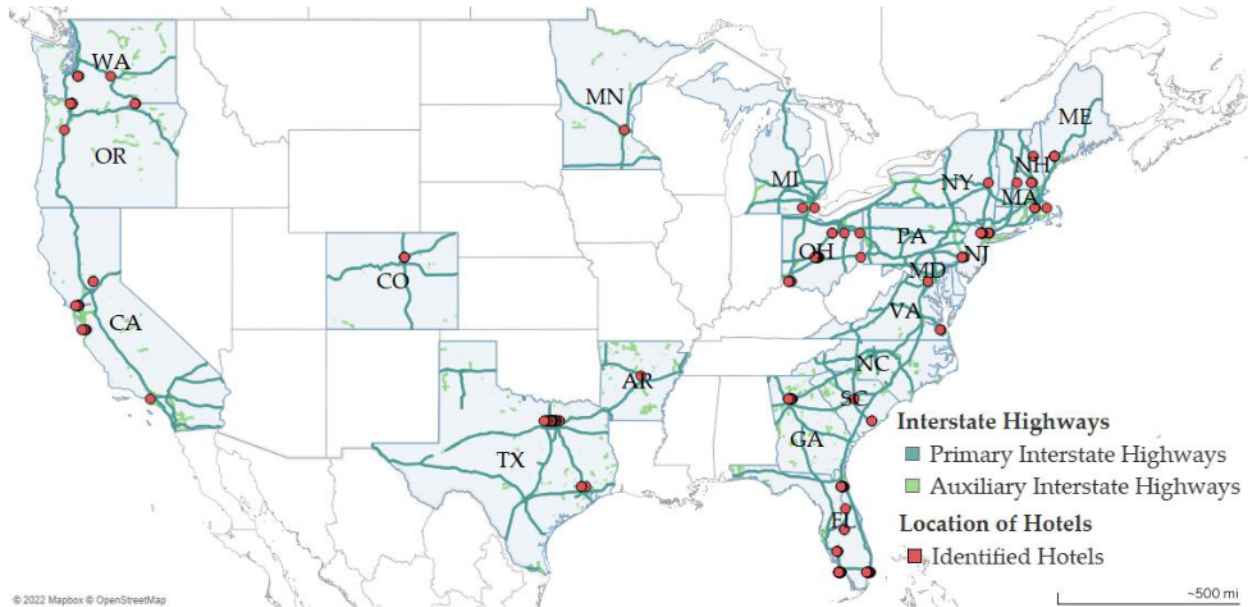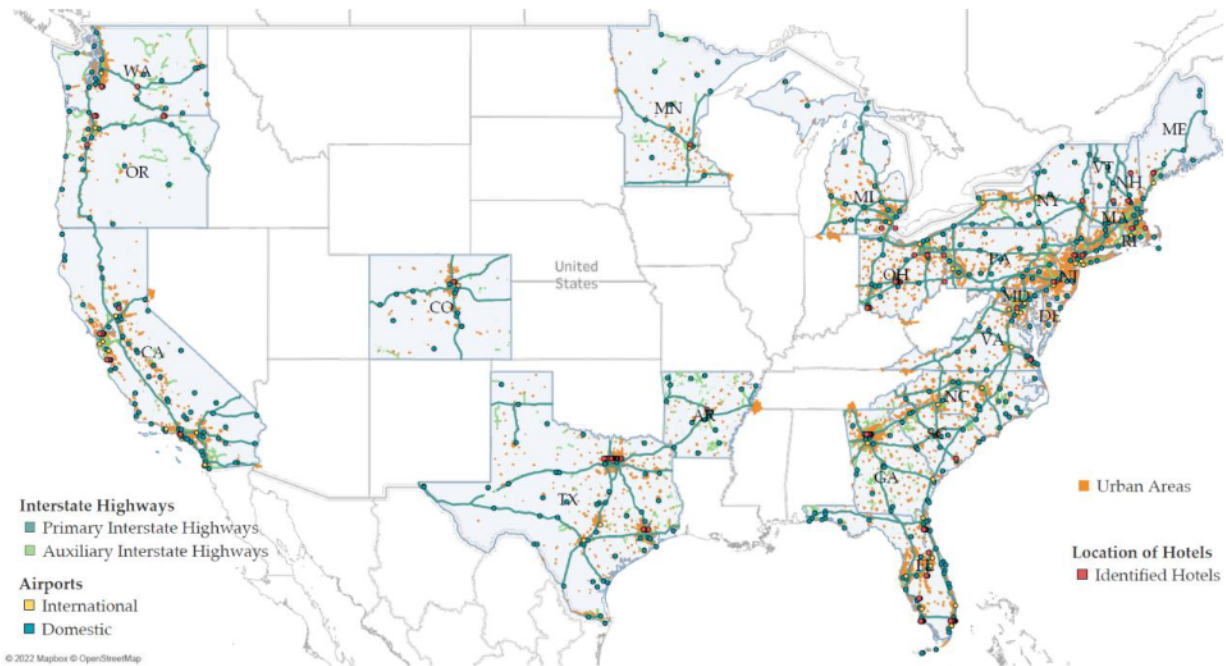

Graph 2. Map of the Identified Hotels and the US Major Interstate Highways

Previous research has examined the proximity of hotels to highways, but our research also focused on the proximity of urban hotels to airports. Analyzing the geospatial distribution of hotels named in civil suits reveals that they are also close to metropolitan airports. Many airports are primarily domestic, but some in Florida, New York, Texas, and California are close to international airports. The proximity of hotels to airports used by traffickers suggests that there may be a desire to reach business people and others in transit who may seek sexual services when travelling. Graph 3 reveals the proximity of hotels to airports in urban areas.
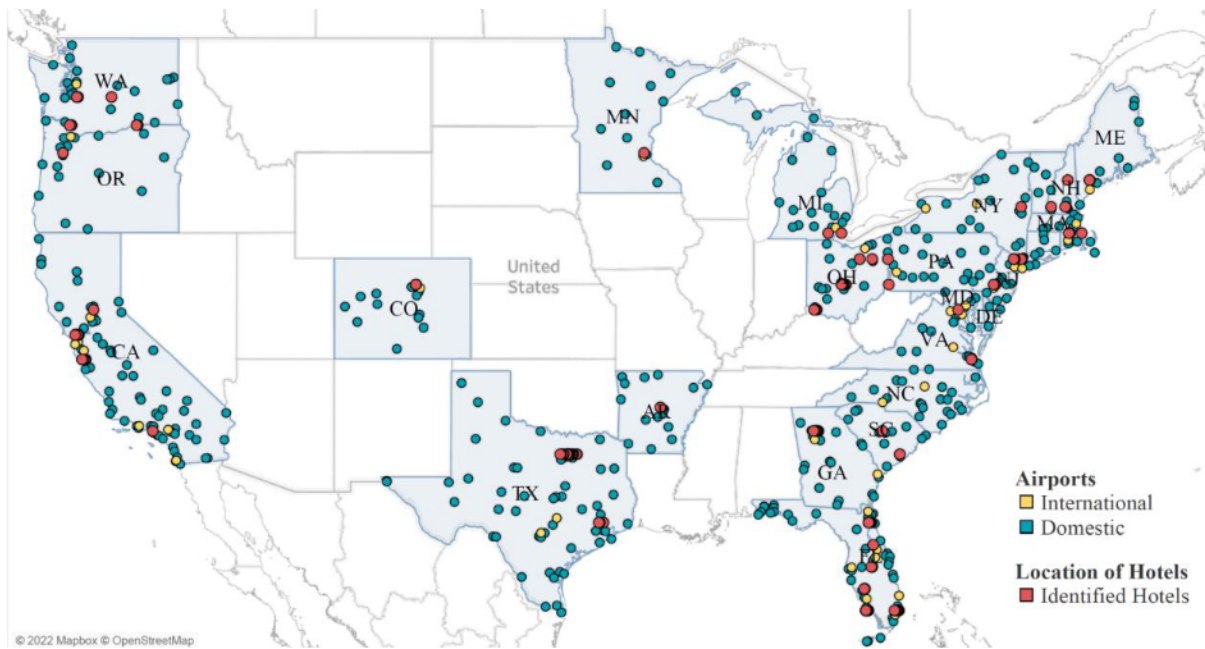
Graph 3. Distribution of International and Domestic Airports and their Proximity to Identified Hotels.

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

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

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

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

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

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

Conclusions

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

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

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

Reading the federal civil cases analyzed in this paper, it is apparent that victims are often subject to severe physical abuse in the hotels where they are exploited. As the US human trafficking hotline and court cases reveal, this is not an isolated phenomenon. Hotels play a much more significant role in human trafficking than has been recognized in the anti-trafficking community or by law enforcement. Moreover, the centrality of hotels to human trafficking in the United States shows an absence of corporate social responsibility by those in the hospitality sector. For too long as hotel industry specialists have pointed out, they have prioritized profits over the prevention of sex trafficking (Leary, 2019). Moreover, they have failed to invest in the training and the other surveillance efforts that would make it possible to detect and address human trafficking. The proliferation of lawsuits with precise illustrations of the severe sexual and physical abuse of trafficking victims is seen by hospitality and legal specialists as having significant reputational consequences for a large number of brands and chains that have been identified in the lawsuits (Fish, 2017; Ross, 2021; Rothberg, 2019; Soloway & Mohler, 2021).

This research reveals that the selected hotels are near transport hubs–on and off highways and in proximity to airports. In most cases, they are located in poorer areas of the city, but not the poorest as those rarely have hotels or motels. Also, most hotels named in suits are located in areas where most families fall below the city's median income level. Yet approximately a quarter of the urban hotels used by traffickers cater to a more affluent clientele and have higher hotel star ratings. This phenomenon has been rarely discussed and conflicts with much research on urban crime that

identifies "hotspots of crime" (Weisburd, 2015; Weisburd et al., 2017) located primarily in poor urban areas.

The federal trafficking cases reveal a significant underrepresentation of the hotels of the most prominent American cities such as New York and Los Angeles in the law enforcement actions taken against sex trafficking. This is part of a larger problem in which these big cities have fewer prosecutions of human trafficking although reporting to the hotline suggests that sex trafficking is not less prevalent in large urban areas. Law enforcement in these locales with few hotels cases needs to be more proactive in pursuing the criminal networks that perpetuate the trafficking and the corporate actors that help facilitate this crime.

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

The modus operandi of human trafficking has changed dramatically over the last decade with the rise of the internet and social media as key facilitators of human trafficking. With this dramatic transition, the distribution of human trafficking in urban areas has changed dramatically. Analysts of human trafficking need to pay much more attention to the new geospatial distribution of human trafficking and the facilitators of this crime, such as the hotel sector and ride-sharing services. Defining an effective response to the central role of the hospitality industry requires coordinated efforts of civil society, law enforcement, the legal and financial communities, and survivors. Together these groups can use their diverse insights, skills, and authorities to address this critical but insufficiently addressed problem of a key sector of the legitimate economy–the hospitality industry– as a primary facilitator of the crime of sex trafficking.

Recommendations

The analysis points to several essential directions by which to reduce the facilitating role of the hospitality sector in the crime of sex trafficking.

Response of City Government

Individual cities have attempted to address the problem. Both Houston and Baltimore require hotels to provide annual training on identifying and reporting sex trafficking (Houston Permitting Center, n.d.; Prevent Human Trafficking in the Hospitality Industry, n.d.). Without providing this training, hotels lose their ability to operate in the city. In Baltimore, this training is done in coordination with the NGO ECPAT (Baltimore City Health Department, n.d.). Several other cities in their registration process have already taken this approach. The involvement of NGOs may provide a more sensitive approach to victims of trafficking. The other cities have followed Houston and Baltimore's lead.

Response of Law Enforcement

Law enforcement has tried different approaches, including undercover operations in hotels, sting operations, and using financial leverage against hotel owners. In Wilmington, North Carolina, law enforcement went to the banks that held the mortgages of the hotels facilitating sex trafficking. Law enforcement informed the bankers that they would close the hotels down for numerous legal violations, then the banks could not collect their mortgage payments. Therefore, the mortgage holders pressured the hotels to change their operating procedures to keep operating. Otherwise, they might face foreclosure of their loans. The use of financial measures would mean that the hotel owners would lose their equity and credit rating, undermining their ability to engage in future businesses. This could be a more effective measure than law enforcement trying to close down the facility, resulting in long-term, time-consuming and expensive litigation with the hotel owner-operator.

Law enforcement often concentrates its resources in hotspots of crime in the poorest areas of cities. It develops informants in criminal gangs and networks. Yet human trafficking, according to this research, operates in different parts of cities that are not often so intensely policed, and law enforcement is generally not developing informants in hotels. Therefore, there needs to be a new modus operandi among the police to find instances of human trafficking in hotels. They need to understand the geospatial distribution of human trafficking in their communities and then target resources, particularly near transport hubs. As will be discussed, they also need to develop partnerships with hotels and their managements to coordinate information sharing.

Response of the Financial Community

The financial community has worked with survivors of human trafficking to identify payment methods and patterns associated with trafficking, including at hotels. These financial indicators of

human trafficking in hotels have been incorporated into the algorithms used by banks and payment processors to identify suspicious financial transactions (AML Voices, 2021). These financial indicators can lead to SARs (Suspicious Activity Reports) filed with FINCEN (the financial intelligence unit of the US Department of Treasury), and can then be used to initiate investigations on the city level. They can also help police allocate their resources to identify and respond to human trafficking.

Role of the Hospitality Sector

There are many ways that hotels could dramatically reduce their facilitating tole in human trafficking. This includes training, inspections, collaborations with law enforcement and civil society, monitoring technology, and whistleblowing protections for employees.

Many hotel chains provide for annual inspections and compliance checks on franchised and managed locations. But these inspections are far between and often cursory. Much more could be done to enhance compliance. Compliance could be improved by creating formally structured, ongoing communication between local law enforcement, individual hotels and corporate representatives. The prioritization of working relationships between the managers of hotels and law enforcement has been suggested by organizations such as ECPAT and SHRM (Society for Human Resource Management) (Atkins & Lee, 2021; ECPAT-USA, n.d.-a; O'Connell, 2020).

Monitoring to ensure that hotel surveillance technology is operating is key. In examined legal cases, surveillance cameras have been intentionally disconnected or obscured by the traffickers to facilitate their operations. Traffickers also use technology to their advantage. They post advertisements of victims online in hotel lobbies because of front desk employees are inattentive. In other cases, according to court cases, they contact customers from hotel lobby computers. This suggests that hotel staff must be more alert about the abuse of hotel computers and responsibly react when they identify a potential problem.

Employee training

Hotel chains that issue franchises must include language with those obtaining franchises; they adopt anti-trafficking measures, including personnel training. This has been absent from many of these operational agreements which is evident from interviews with hotel companies by one of the authors. Further evidence has been found in the civil suits against franchisees. Therefore, training outside of cities with hotel requirements has often failed to materialize.

Many hotels employ individuals in low-paid jobs with little job security. Some even have precarious legal status. Yet these low-level employees are the ones most likely to observe human trafficking. Unfortunately, there are inadequate programs in many hotel chains to protect these whistleblowing workers who might contact law enforcement concerning evidence of human trafficking that they come across in the course of their work.

Role of Civil Society

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

Changes in Federal Legislation

Adequate whistleblower protections are not being provided by hotels to workers that report facilitation of human trafficking either to hotel management or law enforcement. The Anti-Money Laundering Act of 2020 (AMLA) provided whistleblowers within financial institutions protection who came forward when they saw the abuse. This encourages employees who might otherwise have been unlikely to risk their jobs to report suspicious activity (Dante et al., 2021). The creation of a sex trafficking whistleblower provision aimed explicitly at hospitality workers might also help incentivize the many low-level hotel employees who are the most likely to come in contact with human trafficking to report indicators of sex trafficking in the facilities where they clean rooms and provide services.

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