

## Article

# Combating Sex Trafficking: The Role of the Hotel—Moral and Ethical Questions

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**Abstract:** Legitimate companies are key facilitators of human trafficking. These corporate facilitators include not only websites providing advertisements for commercial sex services but also hotels and motels. Analysis of all active federal criminal sex trafficking cases in 2018 and 2019 reveals that in approximately 80% of these cases, victims were exploited at either hotels or motels. This paper studies the prevalence of the hospitality industry in the crime of sex trafficking and the failure of this industry to address this problem until recent civil suits were filed by victims against individual hotels and chains. Drawing on the civil cases filed in federal courts by victims of human trafficking between 2015 and 2021 along the East Coast of the United States, this paper assesses the characteristics of these hotels and the conditions in the hotels that facilitated sex trafficking. The paper then explores the moral and ethical problems posed by the facilitating role of hotel owners/operators in sex trafficking either through collusion or failure to act on and/or report evidence of individual abuse. Suggestions on how to address the problem are provided.

**Keywords:** human trafficking; sex trafficking; illicit supply chain; hospitality industry; geographical crime



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## 1. Introduction

The Trafficking Victims Protection Act passed in 2000 focused on the crime of human trafficking. But by 2008, the Reauthorization of the TVPA ([William Wilberforce Trafficking Victims Protection Reauthorization Act 2008](#)) recognized that there were more than criminal actors involved in human trafficking. The supply chains for human trafficking consisted not only of illicit actors but many from the legitimate economy. Provisions were introduced by Congress in 2008 in the Reauthorization of the TVPA to hold specific entities and individuals liable for civil damages if they derived “financial benefit from human trafficking” ([Shavers 2012](#)). Entities such as motels and hotels<sup>1</sup> as well as “massage parlors, restaurants, and even online platforms, that facilitate or financially benefit from a trafficking enterprise” have been sued only since 2015 even though this has been possible since 2008 ([Sagduyu 2020](#)).

The significant number of hotels sued is not surprising considering the centrality of the hospitality industry to human trafficking, which has also been identified in hotline data. The human trafficking hotline in the United States run by the Polaris Project has identified hotels as key locales for both labor and sexual exploitation ([Anthony et al. 2018](#)). In the period from December 2007 through December 2017, 3596 instances of human trafficking involving a hotel or motel were reported through the National Human Trafficking Hotline ([Anthony et al. 2018](#), p. 16). In a survey with 127 selected trafficking victims, 79% of those surveyed had contact with the hotel sector ([Anthony et al. 2018](#), p. 12). Furthermore, the Human Trafficking Institute Reports for 2018 and 2019 indicated that in 81.5% (312) of federal criminal cases in 2018 and 80% (296) of federal criminal cases in 2019, a commercial sex act took place in a hotel ([Feehs and Currier 2019](#), p. 14; [Feehs and Currier 2020](#), p. 30).

This paper focuses on the federal civil cases filed against the hospitality industry since 2015 for its role in facilitating sex trafficking. This study analyzes the federal civil sex trafficking cases against hotels on the East Coast of the United States, which has more data available to the authors, more variety among different states and more transportation network complexity compared to other regions in the US. Seventeen states, including Delaware, Florida, Georgia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, North Carolina, Pennsylvania, South Carolina, Vermont, Virginia, and West Virginia, and the District of Columbia are analyzed. There were no cases identified in Connecticut, North Carolina, or Rhode Island. The cases were examined both to determine the names and locations of the hotels where the acts of sex trafficking occurred and also to understand the context and the circumstances associated with sex trafficking. In the states of the United States where these civil cases were filed, there is no possibility of legally engaging in commercial sex work.

The same chains of economy hotels figure prominently in both civil and criminal federal cases of sex trafficking (Feehs and Wheeler 2021, p. 54). Although many of the hotels being sued are considered economy or low-priced, high-end hotels franchised by Hilton, Marriott, and Wyndham are also allegedly sites of exploitation, according to the civil suits filed by trafficking victims (Ramey 2020). The high correlation of the hotels cited in both the criminal and civil cases is key as it suggests that the genesis of the civil suits by trafficking victims against particular hotel chains is not motivated primarily by the assets of the holding company but reflects the complicity of these major hotel chains in the crime of human trafficking as revealed by the information revealed in the federal criminal investigations.

## 2. Materials and Methods

The analytical data builds on years of more qualitative research concerning the role of the hotel sector in human trafficking. Earlier research was done by one of the authors in the context of the World Economic Forum (WEF) group on human trafficking. The WEF group addressed the role of the hospitality sector in human trafficking (Bain and Shelley 2015). In addition to this major project that involved significant communication and interviewing with people at both the high and middle level in the hospitality industry, the authors have done extensive reading of both federal and civil cases, and have conducted interviews with members of NGOs and law enforcement that have worked on cases involving hotels as locales of human trafficking. In addition, one of the authors has spoken with lawyers defending hotels subject to suits by human trafficking victims and also with corporate officials responsible for implementing and monitoring ESG (Environment, Social and Governance) policy in the hospitality and other industries.

Federal civil cases initiated by victims of sex trafficking were examined not only for the data on hotels/motels where exploitation took place but also for the types of exploitation that occurred there. For example, in the first civil case that was settled with the victim, the victim alleged that the owners of the Shangri-La motel in Massachusetts ignored her abuse, physical appearance, and calls for help (see note 1). Reading the civil cases allowed us not only to identify the hotels where the exploitation allegedly occurred but also to analyze the conditions that facilitated the trafficking venture in the hotel.

### 2.1. Source of Cases

The federal civil cases filed between 2015 and 2020 are based on a list of cases provided by the Human Trafficking Institute (HTI) to the author. HTI conducts an exhaustive yearly review of federal cases involving human trafficking in the U.S. The data from HTI includes 497 defendants, consisting of 347 business entities and 150 individuals in the U.S. Several entity defendants are named in multiple cases; each defendant is counted once per case. The entities are classified by industry, including adult film companies, athletic organizations or sports facilities, financial entities, governments or government contractors, news or media, property managers, recruiters or human resource agencies, restaurants or food

industry, technology companies, website/online platforms, hotels, and others. Within this list, there are 53 cases and 225 entity defendants in 17 eastern states. The list of cases provided by the HTI organized the civil cases by the case year, case name, district court, case number, defendant name, and type of entities (e.g., hotel and website/online platform) allowing for ready extraction of the cases that were subsequently examined more closely. Further, the civil cases filed in 2021 were gathered from an individual search conducted by the researchers connected to this project. Three individual cases filed in Florida, South Carolina, and New Jersey respectively were retrieved by searching through online news sources, federal press releases, legal news websites including Law360, the American Bar Association, the legal document database Justia.com, and the legal database Nexis Uni (product of LexisNexis). The three cases filed in 2021 should not be considered an exhaustive list of cases for 2021 thus far. In total, 91 hotels/motels are analyzed in this study, including 77 hotels/motels extracted from 21 cases provided by the HTI and 14 hotels/motels extracted from 3 cases gathered from individual research.

In Table 1, 21 cases in the eastern United States are examined in which the defendants were categorized as “hotels” by the Human Trafficking Institute, with a total of 114 corporate defendants. Using the case numbers provided by HTI, the researchers searched for each case on Public Access to Court Electronic Records ([PACER 2021](#)) and retrieved the civil dockets, complaints, and amended complaints (if applicable) for each case. By reviewing the complaints and amended complaints for each case, a total of 77 hotels/motels with addresses cited as a location of sex trafficking were identified. In most cases, the addresses were listed in either the subsections “parties” or “factual allegations”. The allegations listed in these complaints also serve as the basis of the researchers’ analysis of the role of hotel employees in the facilitation of sex trafficking.

**Table 1.** Number of Sex Trafficking Cases in the States of the East Coast Retrieved from Human Trafficking Institute data.

| States or Federal District | Number of Civil Cases | Number of Entity Defendants | Number of Sex Trafficking Cases That Involve Hotels | Number of Defendants Categorized as “Hotels” | Number of Identified Hotels |
|----------------------------|-----------------------|-----------------------------|---|--|-----------------------------|
| Connecticut                | 0                     | 0                           | 0   | 0  | 0                           |
| Delaware                   | 1                     | 1                           | 0   | 0  | 0                           |
| District of Columbia       | 0                     | 0                           | 0   | 0  | 0                           |
| Florida                    | 7                     | 75                          | 5   | 51   | 42                          |
| Georgia                    | 9                     | 58                          | 6   | 42   | 14                          |
| Maine                      | 1                     | 2                           | 1   | 2  | 4                           |
| Maryland                   | 0                     | 0                           | 0   | 0  | 0                           |
| Massachusetts              | 3                     | 11                          | 2   | 4  | 3                           |
| New Hampshire              | 1                     | 4                           | 2   | 4  | 5                           |
| New Jersey                 | 0                     | 0                           | 0   | 0  | 0                           |
| New York                   | 26                    | 173                         | 2   | 8  | 3                           |
| North Carolina             | 0                     | 0                           | 0   | 0  | 0                           |
| Pennsylvania               | 2                     | 2                           | 1   | 1  | 3                           |
| Rhode Island               | 0                     | 0                           | 0   | 0  | 0                           |
| South Carolina             | 1                     | 1                           | 1   | 1  | 1                           |
| Vermont                    | 0                     | 0                           | 0   | 0  | 0                           |
| Virginia                   | 2                     | 3                           | 1   | 1  | 2                           |
| West Virginia              | 0                     | 0                           | 0   | 0  | 0                           |
| Grand Total                | 53                    | 225                         | 21  | 114  | 77                          |

## 2.2. Background of Hotels and Corporations

After identifying the 91 hotels/motels shown in Table 2, we analyzed the hotels by their attributes (i.e., star ratings, type of ownership, location) and the background of the hotel parent companies (e.g., parent company name, public or private company). The hotel addresses provided in the court documents indicate where the hotels are located.

**Table 2.** Total Number of Identified Hotels in Eastern States and District of Columbia.

| States or Federal District | City/County of the Hotel Location<br>(Number of the Identified Hotels in Each City/County)   | Number of the Identified Hotels |
|----------------------------|--|---------------------------------|
| Connecticut                | None   | 0                               |
| Delaware                   | None   | 0                               |
| District of Columbia       | None   | 0                               |
| Florida                    | Coral Springs (1), Fort Lauderdale (4), Fort Myers (5),<br>Jacksonville (9), Kissimmee (2), Naples (20), Orlando (2),<br>Plantation (3), Sunrise (1) | 47                              |
| Georgia                    | Alpharetta (2), Atlanta (4), Chamblee (1), Conley (1),<br>Decatur (1), Jonesboro (2), Marietta (1), Morrow (1),<br>Smyrna (1)                        | 14                              |
| Maine                      | Portland (2), South Portland (2)   | 4                               |
| Maryland                   | None   | 0                               |
| Massachusetts              | Framingham (1), Marshfield (1), Seekonk (1)  | 3                               |
| New Hampshire              | Concord (2), Keene (1), Tilton (1), Gilford (1)  | 5                               |
| New Jersey                 | Elizabeth (6), Newark (1)  | 7                               |
| New York                   | Bronx (1), Queens (1), Albany (1)  | 3                               |
| North Carolina             | None   | 0                               |
| Pennsylvania               | Philadelphia (3)   | 3                               |
| Rhode Island               | None   | 0                               |
| South Carolina             | Charleston (1), Columbia (1), North Charleston (1)   | 3                               |
| Vermont                    | None   | 0                               |
| Virginia                   | Hampton (2)  | 2                               |
| West Virginia              | None   | 0                               |
| Grand Total                |  | 91                              |

To determine the characteristics of the hotel, we used the hotel name and address listed in the case documents and searched using Google Maps API to extract the city/county of the hotel, the star rating, coordinates, and the status of each hotel (whether the hotel is still operating, permanently closed, or has changed its name). We also searched the same address using the hotel booking platform, Hotels.com, to verify the star rating of each hotel and the presence if any of nearby casinos or resorts, filling in the corresponding information that was not recorded on Google Maps API. We used the hotel booking platform to extract the labels for facilities listed near the hotels, referencing the subsection “What’s Around” found under the “Property highlights” column on the platform website (i.e., XXX airport—X.X mi/X.X km). These facility labels show the name of nearby transportation facilities (e.g., highways, airports, or train stations), entertainment facilities (e.g., casinos, resorts, or amusement parks), and other facilities such as universities, hospitals, stadiums, local centers, shopping malls, or local attractions. The distance from the facilities to the hotels is less than 15 miles, which typically takes less than a 30-min drive. On Hotels.com, the section “What’s Around” usually only displays the nearest facility within the top 5 results. Therefore, to enhance the understanding of the locale we also verified the hotel address on Google Maps API and explored whether there were more transportation facilities within a driving time of 30-min.

The defendants of the civil cases against hotels include both individuals and companies. To examine the public or private status of the defendant companies, we searched each company name in the Electronic Data Gathering, Analysis, and Retrieval (EDGAR 2021) system of the U.S. Securities and Exchange Commission (SEC) and cross-referenced these findings by searching the company names in the database Mergent Online. All publicly traded companies are required to file with the SEC, and are identified within the EDGAR system by individual Central Index Keys (CIK numbers). All public defendant companies are listed with their CIK numbers in Appendix A. Many cases were filed against parent companies as well as company subsidiaries, and certain cases were filed against hotel brands which changed parent company ownership since the alleged trafficking events. In

order to fully understand the corporate context of the case allegations, we reviewed the ownership history of each company using SEC reports to determine the parent company of each hotel.

### 3. Results

By reviewing the cases, we identified 91 hotels/motels on the east coast that were used for these illicit activities. Human trafficking occurs frequently at privately owned hotels and motels, such as the initial 2015 case. Yet much trafficking also occurs at hotels and motels belonging to larger chains, rather than only privately-owned establishments.

Furthermore, the analysis of the characteristics and background of each identified hotel reveals that most of these sex trafficking locations cited in these civil lawsuits are economy hotels franchised by major hotel chains which are public companies. Although many of these chains have agreements with the NGO ECPAT (End Child Prostitution and Trafficking) to educate the staff on recognizing the signs of human trafficking, in many cases the promised commitments of public companies to combat sex trafficking in their hotels are not being implemented thoroughly, as will be discussed.

The analysis of the hotel locations where human trafficking has been identified shows that incidents of sex trafficking occur most frequently at hotels near the ramps of main and auxiliary interstate highways, indicating these transportation hubs are hotspots of sex trafficking crime. This is an important transition in sex trafficking as the online advertisements for sex have moved sex trafficking from its formerly visible role on the street to its more covert form where customers meet the trafficking victim in a hotel after having previously arranged an appointment online. The use of hotel rooms close to highways reflects the mobility of the victims who are confined neither in apartments or brothels but in locales to which they can easily move and where the traffickers can connect with mobile customers. The mobility of American victims of human trafficking is a phenomenon more associated with the United States than other regions of the world (Shelley 2010b, p. 241).

The abuses committed by some hotel employees are quite severe. According to the federal case documents, several plaintiffs allege that hotel managers and employees helped facilitate sex trafficking and sometimes directly benefited from the crime. In the most extreme cases, some hotel staff acted as traffickers themselves. The employees allegedly ignored the victims' signals for help or assisted the traffickers in guarding victims if they attempted to escape. Several cases allege that the employees received benefits from the traffickers in the form of money, drugs, or sex with the victims. For example, while being trafficked out of a Massachusetts Red Roof PLUS+ between 2017 and 2019, one victim alleged that her trafficker paid the hotel employees at the front desk "tips" and "hush money" in amounts that often equaled the cost of the room.<sup>2</sup> In exchange, the employees provided rooms which were isolated from other hotel guests. In Georgia, one minor victim alleged that while being trafficked at a Days Inn in 2018, hotel employees and managers acted as police lookouts for the traffickers, and visited the room where the victim was held on multiple occasions to buy drugs from the traffickers.<sup>3</sup> The victim alleged that the Days Inn employees were already familiar with her traffickers, as they had exploited other minor victims at the same hotel previously. Similarly, in the period between 2010 and 2018 at a Red Roof Inn in Smyrna, Georgia, employees were allegedly paid to act as police lookouts and also bought drugs from the traffickers on occasion. Security guards allegedly paid the traffickers for sex with the victims "repeatedly".<sup>4</sup> On one occasion, an employee allegedly watched as one victim's trafficker choked her in an exterior breezeway of the hotel.

#### 3.1. Case Analysis

Table 3 summarizes the number of all the civil cases against hotels human trafficking for the years 2015 to 2021 along the east coast of the United States. The number of civil cases filed against hotels decreased on a national scale from 2019 to 2020, likely due to pandemic-related changes in court procedures and postponements (UNODC 2021). However, the number of civil cases filed in east coast states remained consistent in 2019 and 2020.



**Table 3.** Civil Cases Against Hotels and Identified Hotels in the East Coast States.

| Case Source                 | Filed Year | Number of Filed Cases | Number of the Identified Hotels from the Cases | Number of Case Terminated |
|-----------------------------|------------|-----------------------|--|---------------------------|
| Human Trafficking Institute | 2015       | 1                     | 1  | 1                         |
|                             | 2019       | 10                    | 36   | 6                         |
|                             | 2020       | 10                    | 40   | 7                         |
| Individual Search           | 2021       | 3                     | 14   | 0                         |
|                             | Total      | 24                    | 91   | 14                        |

We focused on the eastern coast states of the United States from which we extracted not only the names of the hotels and their locations but examined the cases to see what kind of exploitation occurred in these hotels, often in direct violation of existing hotel policy. However, many of these suits address exploitation that occurred as early as 2006 through 2009<sup>5</sup>, at a time when many hotels did not have anti-human trafficking policies in place.

The lengthy time period for court procedures can be extracted from the filing date and termination data on the case docket. The term “termination date” simply refers to the date of case closure, and does not necessarily indicate a decision favoring the plaintiff or defendant. Table 4 summarizes the period from filing to close for each case. 14 cases are recorded as terminated before September of 2021 and 10 cases filed from 2019 to 2021 are still in progress. The first civil case took approximately 4 years (see note 1), from when the case was initially filed in 2015 to December of 2019 when the victim received an undisclosed monetary award from the defendant. There was a hiatus from 2016 to 2018 in which no cases were filed against hotels. Then cases were filed again in 2019 in significant numbers. Then the time frame for the court procedures shortened to around a year, with the exception of one case filed on 28 May 2019 (see note 2) which was processed over approximately 2 years due to the pandemic. Changes in the speed of judicial procedures as seen in Table 4 have forced the hospitality industry to respond more rapidly to these allegations.

**Table 4.** Period of Time Until the File Closed.

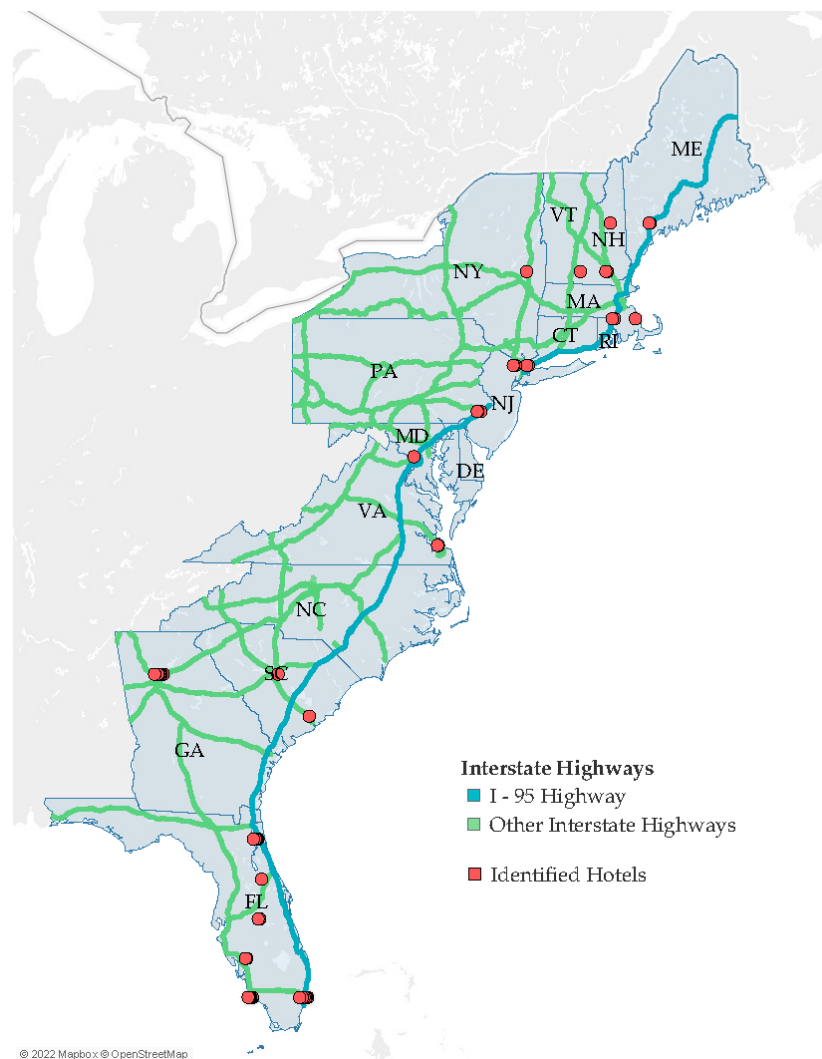
| Period of Time Until the File Closed | Number of Cases Terminated |
|--------------------------------------|----------------------------|
| Around 4 years                       | 1                          |
| Around 2 years                       | 1                          |
| Around 1 year                        | 11                         |
| Less than 1 year                     | 1                          |
| In Progress                          | 10                         |

### 3.2. Location Analysis of the Identified Hotels

We analyzed the facilities near the identified hotels/motels. The summary is shown in Table 5. In addition, the map of the identified hotels and the nearby interstate highways is shown in Figure 1. We found that 98% of the identified hotels and motels are close to the ramps of the main interstate highway and auxiliary roads to these interstate highways. Most of them are located near the main north-south Interstate Highway (Interstate 95) which is a hub of the transportation system of the east coast of the U.S. The distance between all identified hotels to the nearby highway is only 3.89 miles on average. Only two hotels sued in New Hampshire are not close to any main highways, international airports or casinos. But these hotels are near the ski resorts in Keene and Guilford, New Hampshire. Furthermore, one identified hotel in Massachusetts and the 45 identified hotels in Florida are near beach resorts and also near ramps to major highways.

**Table 5.** Total Number of Certain Facilities Nearby the Identified Hotels.

| States or Federal District | Number of the Identified Hotels | Near Highway Ramp <sup>6</sup> | Near International Airport | Near Casinos | Near Resorts |
|----------------------------|---------------------------------|--------------------------------|----------------------------|--------------|--------------|
| Connecticut                | 0                               | 0                              | 0                          | 0            | 0            |
| Delaware                   | 0                               | 0                              | 0                          | 0            | 0            |
| District of Columbia       | 0                               | 0                              | 0                          | 0            | 0            |
| Florida                    | 47                              | 47                             | 27                         | 43           | 45           |
| Georgia                    | 14                              | 14                             | 11                         | 0            | 0            |
| Maine                      | 4                               | 4                              | 4                          | 0            | 0            |
| Maryland                   | 0                               | 0                              | 0                          | 0            | 0            |
| Massachusetts              | 3                               | 3                              | 2                          | 2            | 1            |
| New Hampshire              | 5                               | 3                              | 3                          | 3            | 2            |
| New Jersey                 | 7                               | 7                              | 7                          | 1            | 0            |
| New York                   | 3                               | 3                              | 2                          | 3            | 0            |
| North Carolina             | 0                               | 0                              | 0                          | 0            | 0            |
| Pennsylvania               | 3                               | 3                              | 3                          | 3            | 0            |
| Rhode Island               | 0                               | 0                              | 0                          | 0            | 0            |
| South Carolina             | 3                               | 3                              | 2                          | 0            | 0            |
| Vermont                    | 0                               | 0                              | 0                          | 0            | 0            |
| Virginia                   | 2                               | 2                              | 0                          | 2            | 0            |
| West Virginia              | 0                               | 0                              | 0                          | 0            | 0            |
| Grand Total                | 91                              | 89                             | 61                         | 57           | 48           |
| Percentage                 | 100%                            | 98%                            | 67%                        | 63%          | 53%          |

**Figure 1.** Map of Identified Hotels and Interstate Highways.

Proximity to transport is key in understanding the hotels chosen by sex traffickers. The mobility of victims of sex trafficking is a significant characteristic of trafficking in the United States. The proximity to highways is key as almost none of the hotels are located in urban areas with readily accessible public transport. Sixty seven percent of the identified hotels/motels are near international airports, which provide a transportation connection for travel within the U.S. as well as to other countries. The hotel locations named in the sex trafficking suits are also concentrated near the ramps of main and auxiliary interstate highways, indicating that these central transportation locations are hotspots of sex trafficking. Further, the analysis of the identified hotels reveals that most of these locales of sex trafficking cited in civil suits are economy hotels franchised by publicly owned major hotel chains.

### 3.3. Hotels/Motels Brand and Chain Analysis

To understand the background of the corporate defendants, first, we identified the business type of each defendant in the civil sex trafficking cases. These business types include hotel/motel property companies (i.e., directly owned hotels), management only companies (e.g., Lincoln Hospitality Group, LLC located in Sharon, MA, United States), facility service companies which provide a specific service such as breakfast or house-keeping, real estate companies (e.g., CorePoint Lodging, Inc. located in Irving, Texas), and investment companies such as the hedge fund the Blackstone Group, Inc with over \$600 billion in assets under management. Public company profiles were based on SEC forms gathered from the EDGAR system as well as information provided on the database Mergent Online. To build an understanding of the private companies, the researchers used the open-source databases Buzzfile and Opencorporates ([Buzzfile Media LLC 2021](#); [Ratzesberger et al. 2021](#)). If a private company was not listed in any of these sources, as was the case with several Limited Liability Company (LLC) defendants, the type of business was classified as “other”. Table 6 shows the percentage of defendants categorized by business type, based on an analysis of all the east coast civil sex trafficking cases filed against hotels. As shown in Table 6, 61% of the defendants in the civil cases are hotel & motel companies. This table shows that hotels/motels are not the only companies sued in a civil case but also the service providers are held accountable, e.g., management companies, specific service companies, and real estate or investment companies.

**Table 6.** Business Types of the Company Defendants in Civil Cases.

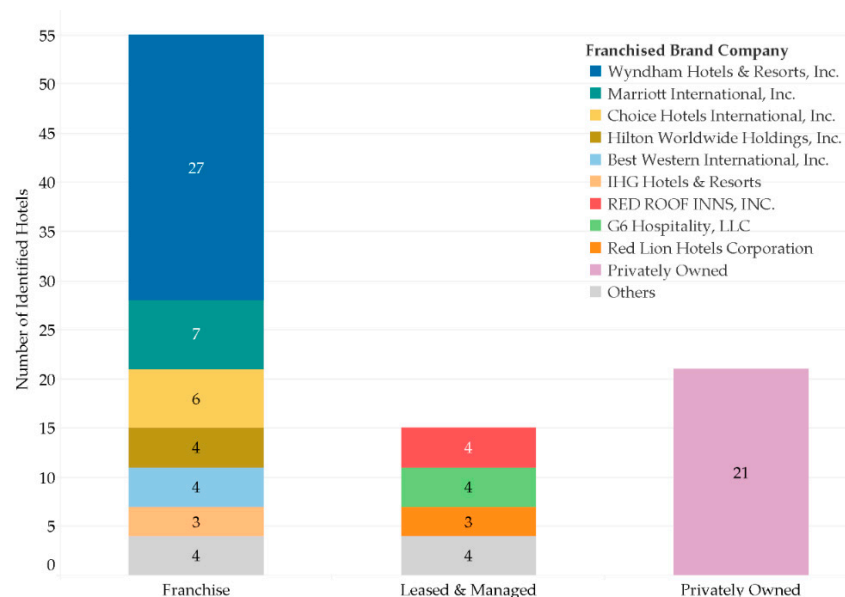
| Hotel & Motels | Management | Facilities Service | Real Estate | Investment | Other  |
|----------------|------------|--------------------|-------------|------------|--------|
| 61% (74)       | 17% (20)   | 7% (8)             | 6% (7)      | 3% (4)     | 7% (8) |

In addition, we analyzed the ownership type of each identified hotel. Hotel ownership can operate under a franchise model, a private-ownership model, or a leased and managed model. Under the franchise model, a franchisee pays a fee to a franchisor to use the franchisor’s brand and receive support in operating their business. Under the private ownership model, private hotel owners operate without the benefit or fees associated with franchised brands. In the leased and managed model, the hotel property owners hire a management company or have a lease with a corporation to operate the business.

For the 91 identified hotels in east coast cases, approximately 60% are franchises, 24% are privately owned, and 15% are leased and managed, as shown in Figure 2. Figure 2 also shows the number of identified hotels of each hotel brand company. The top three franchisor companies that are defendants in federal civil suits on the east coast are Wyndham Hotels & Resorts, Inc. (33 identified hotels), Choice Hotels International, Inc. (10 identified hotels), and Marriott International, Inc. (10 identified hotels). This finding suggests that sex trafficking often occurs at properties franchised by large corporations and major hotel chains. Interviews with individuals who work with hotel franchises saw franchising as



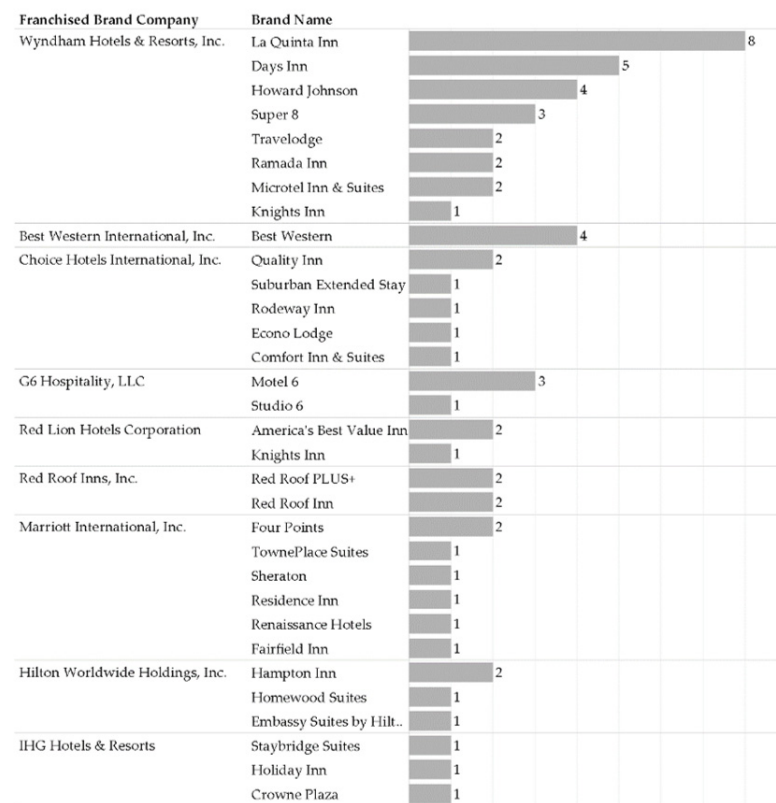
a means to generate revenues for the holding company and these businesses did not prioritize anti-human trafficking policies as these policies entailed costs for the company. Until victims started to initiate suits against hotels, the presence of human trafficking on the business of a franchisee was not a risk factor for the large chain company that granted franchises. Therefore, the large chains had failed to establish anti-trafficking policies as an element of their franchise requirements.



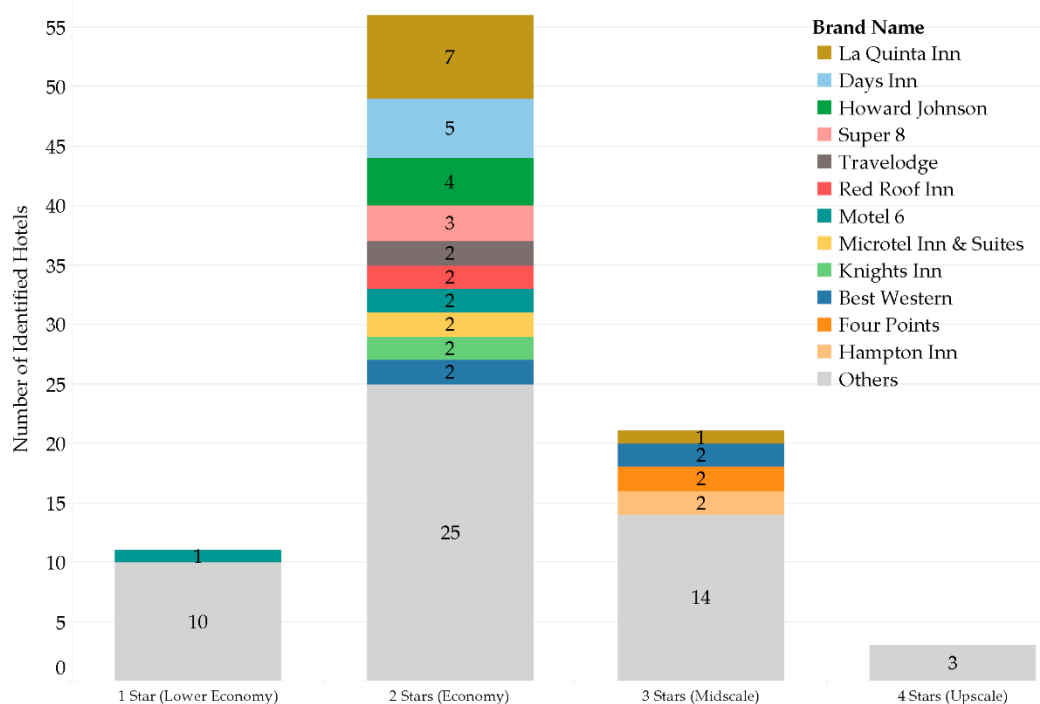
**Figure 2.** Number of Identified Hotels by Type of Ownerships.

In 2019, federal criminal cases revealed that the chains most associated with sex trafficking were Motel 6, Super 8, Days Inn, and Red Roof (Feehs and Currier 2020, p. 30). Figure 3 shows the brands of the top 9 franchise brand companies in the U.S. in which traffickers have exploited their victims and the star ratings of these hotels/motels. Results of this study show that from 2015 to 2021 on the east coast, the top six hotel brands associated with sex trafficking in federal civil lawsuits were La Quinta Inn (8), Days Inn (5), Howard Johnson and Best Western (4), Motel 6 and Super 8 (3).

The star ratings of the identified hotels are another key characteristic of the businesses accused of facilitating sex trafficking. Figure 4 shows the star ratings of the hotels identified in civil cases, which are distributed as follows: 12% (11) one star hotels, 62% (56) two star hotels, 23% (21) three star hotels, and 3% (3) four star hotels. Although the 2-star and 3-star locations comprise more than 85% of all identified hotels of sex trafficking civil cases, these hotels still represent a range of different socioeconomic levels. Examination of the case files of federal civil and criminal cases reveal that the affordability and the accessibility of the hotel were key in the selection of hotels made by traffickers. Some cases reveal that traffickers evaluated hotels as regards to return on investment and would fail to reuse hotels where the income generated by selling sex did not justify the expense of the hotel or motel room. As the previous analysis reveals that at hotel locations which justified traffickers' expenditures, long-term relationships were sometimes established with hotel employees and management.



**Figure 3.** Brand of the Hotels Identified in the Civil Cases Focusing on the Top 9 Franchised Brand Companies.



**Figure 4.** Star Ratings of the Hotels Identified in Civil Cases.

We explored the defendant companies which were involved in the civil lawsuits. Appendix A shows the public and private hotel companies named as defendants, with public companies including Wyndham, Marriott, and Hilton Hotel Groups, as well as

investment companies such as the Blackstone Group. Consequently, our analysis reveals that the hotels identified in these civil suits are predominantly franchised by major hotel companies rather than privately owned businesses. This finding contrasts with the hotels identified in criminal cases in recent years. According to the 2018 and 2019 Federal Human Trafficking Reports, small-chain and non-chain hotels were the most frequently identified hotels in criminal cases in those years (Feehs and Currier 2019, p. iv; Feehs and Currier 2020, p. 30). Large hotel chains may be overrepresented in civil cases due to an effort among plaintiffs to force industry-wide change of behavior among hospitality corporations. Also, the civil cases filed are also often filed with a multi-year lag addressing sex trafficking in previous years before many larger chains initiated anti-human trafficking policies.

This analysis shows that the hotels either did not operate with a standard anti-trafficking policy for employees, or they did not properly implement these policies. Moreover, they also failed to protect employees who might report on instances of human trafficking which they observed.

The civil cases examined were filed between 2015 and 2021; however, the sex trafficking crimes cited in these cases occurred between 2006 and 2020. In recent years, major hotel companies have made efforts to prevent sex trafficking on their premises. Several hotel companies, such as Wyndham, Choice Hotels, and Marriott have joined the U.S. branch of End Child Prostitution and Trafficking (ECPAT-USA), a leading anti-human trafficking NGO. ECPAT-USA provides a set of criteria for member hotels (“The Code”) to follow in order to detect and prevent trafficking in the hospitality industry, including human trafficking awareness training programs for hotel employees. Table 7 shows several major hotel companies that have become members of the ECPAT-USA “Code” since 2011, as well as their implementation status for 2021 as of July 2021. This shows whether the companies had failed to comply with the annual requirements of their agreement with ECPAT as of July 2021, according to ECPAT’s website. In July of 2021, the two highest completion rates of 67% were reported by Choice Hotels and Red Roof Inns; in contrast, ECPAT reported that only 17% of Marriott’s employees had received training. Red Roof Inns operates only in the U.S. In contrast, the hotel companies such as Hilton, Marriott, and InterContinental Hotels Group (IHG) which operate globally, would need to implement employee training in approximately one hundred countries, and Wyndham would need implementation in 22 countries. This could explain why some major hotel chains had a low completion status, according to The Code supported by ECPAT (THECODE.ORG 2021).

**Table 7.** The Level of Compliance with the ECPAT Code after Signing the Agreement.

| Name of the Hotel Chain             | Starting Year of Signed Agreement with ECPAT | Implementation Status as of July 2021 |
|-------------------------------------|--|---------------------------------------|
| Wyndham Hotels & Resorts            | 2011   | 50%                                   |
| Hilton Worldwide                    | 2011   | 33%                                   |
| Choice Hotels International         | 2015   | 67%                                   |
| Red Roof Inns                       | 2016   | 67%                                   |
| Marriott International, Inc.        | 2018   | 17%                                   |
| InterContinental Hotels Group (IHG) | 2019   | 17%                                   |

It is important to note that the numbers produced in the annual reports on the ECPAT website may not accurately reflect the amount of training being implemented by hotel companies. For several companies, there are inconsistencies between their official statements on anti-trafficking training and their ECPAT completion status. For example, the ECPAT website showed no training completed by G6 Hospitality by July of 2021; however, the company has publicized reforms implemented within its anti-trafficking training and new partnerships with anti-trafficking organizations as recently as 2020 (G6 Hospitality LLC 2020a; G6 Hospitality LLC 2020b). Similarly, despite its low implementation score in July of 2021, Marriott International has mandated trafficking awareness training at all its managed

and franchised properties globally since 2017 ([Marriott International Inc. 2021a](#)). Therefore, the metrics provided on the ECPAT-USA website may illuminate the level of communication and participation between companies and the ECPAT reporting system, but they do not necessarily reflect actual levels of training implementation among all companies.

### 3.4. Summary of Results

To conclude, understanding the geo-spatial distribution of hotels indicates distinctive crime patterns associated with American sex trafficking. The facilitation of sex trafficking occurs at hotels concentrated near main highway interchanges due to the mobility and flexibility of the traffickers and their clients. The hotels sued are also concentrated in hotels/motels near beaches, casinos, ski resorts, and amusement park areas as these locations are associated with entertainment. In addition, most of the identified hotels are not privately owned, and most of the corporations sued are major hotel chains. The fact that these hotels are sued is not just the result of the fact that they have resources, but some victims' suits indicate that they want to change behavior in this sector and, therefore, have filed suits against some of the largest companies in the hospitality sector.

## 4. Discussion

### 4.1. Hotels Become a Hotspot of Sex Trafficking

With the growth of the internet, the way traffickers solicit customers has changed. They have used online advertisements on websites such as Backpage.com, Craigslist, and other online platforms to solicit customers. With this new way of finding customers, traffickers were no longer limited to specific towns or neighborhoods ([Gamiz 2019](#)). Customers could be found anywhere. A hotel/motel thus became a convenient transient locale for the sex trade as customers can meet the victims of sex trafficking anonymously often after arranging the appointment online ([Bain and Shelley 2015](#)).

Hotels in recent years are represented in over three-quarters of all federal criminal trafficking cases ([Feehs and Currier 2020](#), p. 16), yet the urban areas often associated with hotspots of crime often lack hotels. Therefore, the results of our analysis indicate a very different geospatial distribution of human trafficking than that the criminality commonly associated with urban areas. Typically, low-income urban areas are the hotspots of both violent and property crime ([Graif et al. 2014](#); [Weisburd 2015](#)). But hotels are usually not in the poorest areas of cities. The distinctive feature of the predominance of the hotels named in the civil suits is their proximity to major highways and related auxiliary roads. This suggests that many of the customers of trafficking victims come from outside the local community. The often poor and minority victims of trafficking are moved to different locales and the customers travel as well ([Shelley 2010b](#); [Smith and Vardaman 2010](#); [Milrod and Monto 2012](#); [Roe-Sepowitz et al. 2019](#)). The mobility of the customers also explains why hotels near casinos and resorts also figure prominently in federal civil cases.

The crime of sex trafficking occurs across all socioeconomic classes, and traffickers utilize different business models ([Shelley 2010a](#)). Buyers who purchase sex at a hotel can be wealthy, such as a major league baseball umpire who has an estimated \$1–\$5 million annual salary ([Bailey 2020](#)), or they can be a manual worker with a much lower annual income (*United States of America v. Yanira Del Carmen Guerrero Andrade* 2012). Furthermore, the types of hotels/motels involved are very diverse; they include low-end, high-end, long-term residential hotels, hotels close to airports, and resort hotels/motels. The diversity of hotels used increases the range of geographical locations for the crime and also reflects the diverse incomes of the purchasers of sex.

### 4.2. Ethical and Moral Questions in Reference to Hotels and Hotel Chains

The centrality of the hospitality industry in civil sex trafficking suits suggests that many publicly held companies have not taken sufficient steps to ensure that their properties and employees are not facilitators of sex trafficking. Our results show that most identified hotels in civil suits are franchised by large hotel chains. This raises the moral question

as to whether major hotel chains have prioritized profits over the interests of victims of sex trafficking. This is a central question raised in many of the civil suits against major hotel brands.

The civil cases filed against hotels suggest that the proliferation of trafficking in the hospitality sector is not only the result of employee negligence but is also sometimes the product of deliberate collaboration between traffickers and hotel personnel. Case complaints describe situations where hotel employees and managers received bribes from traffickers in the form of money, drugs, or sex with victims in return for “turning a blind eye” to exploitation and in extreme cases acted as lookouts for the traffickers to protect them from the police. In this way, the moral and ethical boundaries of employees are tested when accepting tips/informal benefits from guests, indicating a need for greater oversight over informal payment between guests and employees.

Insufficient protection for victims has also stemmed from the anonymity provided by online reservations and automated check-in processes (Atkins and Lee 2021). These automated features distance hotel staff from traffickers and their victims, limiting employees’ ability to witness signs of trafficking and intervene as necessary. In light of these features, employees who have regular interactions with guests throughout their stay, such as the housekeeping staff, must take on a more significant role in identifying signs of trafficking. Yet these individuals are often constrained by their absence of job security as well as their often questionable legal status in the United States. To empower low-paid workers of hotels and motels to report human trafficking, there should be the implementation of whistleblower protections. Furthermore, the US government should consider amendments to its T-visa program (the visas provided to trafficking victims who agree to cooperate with law enforcement) to include those who give evidence that helps support a human trafficking prosecution.

#### *4.3. The Commitment to End Human Trafficking by Hotel Groups*

Companies have publicized their commitment to combating sex trafficking through diverse partnerships and recently adopted policies. Several large hotel groups partnered with the non-profit organizations, Polaris and ECPAT-USA, in the early 2010s to develop employee training programs to combat sex trafficking. In more recent years—particularly in the years since 2015—multiple large hotel corporations have publicized either an increase in training or revised efforts to combat trafficking at their locations. For instance, according to a 2021 press release on Marriott International’s website, the company first adopted human trafficking awareness training in 2016. It proceeded to mandate training at all managed and franchised locations in 2017. Marriott International will now launch an enhanced version of the original training, after consultations with trafficking survivors (Marriott International Inc. 2021a). Similarly, in 2018, G6 Hospitality “overhauled” its anti-trafficking training materials to increase relevance and efficiency for staff members. In 2020 the company expanded its partnerships with anti-trafficking organizations including Truckers Against Trafficking and the victim-centered organization New Friends New Life, based in Texas (G6 Hospitality LLC 2020a; G6 Hospitality LLC 2020b). Not all companies have been so aggressive in their commitment to improve their trafficking prevention policies.

While multiple factors may have contributed to these changes, it is likely that the onset of civil action against the hospitality industry is promoting behavioral change. The public shame and stigma associated with sex trafficking lawsuits could be playing a significant role in increasing corporate commitment to combating trafficking. The hospitality industry did not take voluntary action when the civil remedy under the TVPA was established over a decade ago in the trafficking reauthorization legislation.

One final topic of importance within this study is that although major hotel chains have adopted elements of corporate social responsibility, many are not taking the necessary steps to ensure policy implementation. Many recent cases cite events which occurred at hotels after the adoption of anti-trafficking programs, suggesting insufficient training or inefficient implementation.<sup>7</sup>



## 5. Conclusions

The increasing number of sex trafficking cases and the increasing speed of judicial procedures may have influenced corporate entities to take stricter measures to prevent sex trafficking. However, the preceding analysis suggests that diverse hotels chains were not proactive in promoting major change in the industry. Neither did institutional change in the hospitality sector develop from important federal initiatives. The 2008 TVPA that threatened civil penalties against corporations that facilitated the crime of human trafficking also did not prompt more moral behavior by the hotel sector. Nor did the prospect of civil suits from victims of human trafficking initially result in significant policy changes. The failure to act may have been prompted by the unlikelihood of civil action in the United States, a situation that has changed dramatically in the last few years.

Most of the hospitality sector showed an absence of corporate social responsibility. Unlike employees of the airline industry who developed and implemented significant training programs ([Blue Lightning Initiative 2021](#)), the employees in the hospitality sector did not assume a significant role in mobilizing to combat human trafficking nor press the leadership of the chains for which they worked to develop training and codes of responsibility. This may be explained by the vulnerability and lack of job security of many employed in the hospitality sector. From an ethical point of view, the hospitality industry has also lagged behind the financial services industry that has made great strides to locate indicia of human trafficking in their large amounts of data ([United Nations University 2019](#)). They, in contrast to the hotel/motel sector, have developed many indicators to warn of signs of human trafficking and to cooperate in real time with law enforcement to try and rescue potential victims.

By examining the patterns of hotel misuse and their centrality to the crime of human trafficking, serious questions arise as to whether the major hotel chains have prioritized profits over the prevention and facilitation of sex trafficking. Mary Leary, a law professor and specialist on human trafficking suggests that, today as in the past, some corporations choose to ignore the enslavement of human beings because there is so much money to be made through this trade ([Leary 2019](#)). This insight is supported by the research that provides the basis for this analysis. It shows that a wide variety of hotels have been locales used by traffickers to exploit victims—hotels near airports, resort hotels, long-term residential stays, as well as cheaper hotels where customers can meet the victims of sex trafficking often after arranging the appointment online. As an industry sector, the hospitality industry has not been proactive in the United States and now faces expensive law suits that damage the reputations of many in the business.

The hospitality sector and its individual employees have the possibility to play a key role in combatting human trafficking as it is one of the largest economic sectors in the global economy. Before the COVID-19 pandemic began in early 2020, the travel and tourism industry represented 10.6% of Global GDP and provided 334 million jobs globally ([World Travel & Tourism Council 2021](#)). The industry with its global outreach has the possibility of doing much to counter both labor and human trafficking. Apart from hotel companies such as Carlson and Hilton Worldwide that started training and anti-trafficking programs prior to the recent lawsuits ([Carlson 2018](#); [Hilton Worldwide Inc. 2011](#)), there has been limited proactive initiatives by key companies in the hospitality sector to develop methods to stem human trafficking at their facilities. The effort to find a way to develop practices to combat human trafficking has been confined primarily to these higher end corporations of the hospitality industry. Moreover, some high-end hotel companies, based on interviews conducted, reveal that some hotel chains that have franchised properties in the Middle East and Asia have chosen to deliberately ignore complaints of human trafficking because this would be bad for business.

In recent years, there has been a growing movement in support of Environmental, Social and Governance (ESG) objectives. Yet some of the companies, such as Blackstone Group and Marriott, named in the federal civil cases as facilitators of human trafficking espouse the goals of ESG ([Blackstone Inc. 2021](#); [Marriott International Inc. 2021b](#)). But the presence



of explicit civil trafficking suits suggest they have failed to allocate sufficient human and financial resources to address the problem of human trafficking. The inconsistency between professed corporate values and actual conduct was revealed recently in a journalistic expose on hedge funds espousing ESG yet investing in fossil fuels surreptitiously ([The New York Times 2021](#)). This inconsistency between professed norms and corporate behavior is not confined to the energy sector. A key question is how to make businesses in the hospitality sector conform to the ESG values that these companies profess publicly.

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## Appendix A

**Table A1.** Hotel Companies<sup>8</sup> and Chain Hotel Brands Listed in East Coast Civil Case Documents.

| Public Company Defendants  | Private Company Defendants   | Hotel Brands Identified   |
|--|--|---|
| N/A  | <b>Best Western International, Inc.;</b><br>R&M Real Estate Co. Inc.   | Best Western;<br>Best Western Plus  |
| <b>Choice Hotels International, Inc.</b><br>(CIK#1046311)  | Jav, Inc.;<br>R&M Real Estate Co. Inc.;<br>Rosen International, Inc. (d/b/a Rodeway Inn International);<br>SUB-SU Hotel GP, LLC;<br>Westmont Hospitality Group;<br>WHG SU Atlanta LP                       | Comfort Inn & Executive Suites;<br>Econo Lodge;<br>Quality Inn;<br>Rodeway Inn;<br>Suburban Extended Stay |
| Blackstone Group, Inc. (CIK 0001393818)  | <b>G6 Hospitality LLC;</b><br>Aarshivard LLC;<br>Motel 6 Corporation   | Motel 6;<br>Studio 6  |
| <b>Hilton Worldwide Holdings, Inc.</b><br>(CIK#1585689)  | 2014 SE Owner 5-Emory, LLC;<br>Auro Hotels Management, LLC;<br>Hilton Domestic Operating Company, Inc.;<br>Hilton Franchise Holdings, LLC;<br>JHM Hotels Management, Inc.;<br>Laxmi Druid Hills Hotel, LLC | Embassy Suites;<br>Hampton Inn;<br>Homewood Suites  |
| <b>Hyatt Hotels Corporation (CIK#1468174)</b>  | N/A  | Hyatt Regency   |
| <b>Inter-Continental Hotels Corp. (listed in this Appendix as Inter-Continental Hotels Group PLC (CIK#858446))</b> | Holiday Hospitality Franchising, LLC;<br>Naples CFC Enterprises, Ltd.  | Crowne Plaza;<br>Holiday Inn;<br>Staybridge Suites  |
| <b>Marriott International, Inc. (CIK#1048286)</b>  | CSM Corporation;<br>CSM RI Naples, LLC;<br>Residence Inn by Marriott, LLC  | Four Points by Sheraton;<br>Renaissance;<br>Residence Inn;<br>Fairfield Inn;<br>TownePlace Suites         |

Table A1. Cont.

| Public Company Defendants  | Private Company Defendants  | Hotel Brands Identified   |
|--|---|---|
| N/A  | <b>Red Lion Hotels Corp. (acquired by Sonesta International Hotels Corporation in March 2021);</b><br>Vad Property Management, LLC;<br>Vantage Hospitality Group, Inc.  | America's Best Value Inn<br>Knights Inn (4 April 2018-present) <sup>9</sup>   |
| N/A  | <b>Red Roof Inns, Inc.;</b><br>FMW RRI NC, LLC;<br>Red Roof Franchising, LLC<br>RRI III, LLC;<br>RRI West Management, LLC;<br>R-Roof Asset, LLC;<br>Varahi Hotel, LLC;<br>Westmont Hospitality Group, Inc.;   | Red Roof Inn;<br>Red Roof Plus+   |
| <b>Wyndham Hotels &amp; Resorts, Inc.</b><br>(CIK#0001722684);<br>CorePoint Lodging, Inc. (CIK#0001707178) | CPLG Holdings, LLC;<br>CPLG LLC;<br>CPLG Properties, LLC;<br>Days Inn Worldwide, Inc.;<br>Hanuman of Naples, LLC;<br>H.I. of Naples, LLC;<br>Howard Johnson International, Inc.;<br>Jeet & JJ LLC;<br>Kuzzins Buford, Inc.;<br>La Quinta Holdings, Inc.;<br>La Quinta Properties, Inc.;<br>La Quinta Worldwide, LLC;<br>Laxmi of Naples, LLC;<br>Lincoln Hospitality Group, LLC;<br>Lincoln Hotels, LLC;<br>LQ Management LLC;<br>LQ FL Properties, LLC;<br>Microtel Inns and Suites Franchising, Inc.;<br>Newtel V Corporation;<br>Ramada Worldwide, Inc.;<br>Rist Properties LLC;<br>Shanta Hospitality, LLC;<br>Shree Siddhivinayak Hospitality, LLC | Days Inn;<br>Howard Johnson;<br>Knights Inn (2006–3 April 2018: see footnote 3);<br>La Quinta;<br>Microtel Inn & Suites;<br>Ramada;<br>Super 8;<br>Travelodge |

## Notes

- <sup>1</sup> Ricchio v. McLean et al., 2015. United States District Court for Massachusetts. 1:15-cv-13519.
- <sup>2</sup> Doe C.D. v. R-Roof Asset. 2019. United States District Court for Massachusetts. 1:19–cv–11192–NMG.
- <sup>3</sup> R.E. v. Lincoln Hotel, LLC et al., 2020. United States District Court for Georgia Northern. 1:20-cv-03335.
- <sup>4</sup> W.K. v. Red Roof Inns Inc. et al., 2020. U.S. District Court for Georgia Northern. 1:20-cv-05263.
- <sup>5</sup> S.J. v. Choice Hotels Corporation et al., 2019. United States District Court for the New York Eastern. 1:19-cv-06071-DG-PK.
- <sup>6</sup> Highway Ramp: This ramp of the main interstate (I-95), the major intersections (I-4, 10, 16, 20, 26, 40, 64, 74, 76, 78, 80, 85, 87, 90, 91, 93), auxiliary routes (I-195, 295, 395, 495, 595, 695, 795, 895) and the other routes (I-276, 476, 676, 287, 278, 678, 280).
- <sup>7</sup> B. v. Inter–Continental Hotels Corporation et al., 2019. United States District Court for New Hampshire. 1:19-cv-01213-AJ; E.B. v. Howard Johnson by Wyndham Newark et al., 2021. United States District Court for New Jersey. 2:21-cv-02901-SDW-LDW; R.E. v. Lincoln Hotel, LLC et al., 2020. United States District Court for Georgia Northern. 1:20-cv-03335.
- <sup>8</sup> Parent/Major Hotel Companies marked in bold.
- <sup>9</sup> Red Lion Hotels Corporation announced its acquisition of Knights Inn from Wyndham Hotel Group on 4 April 2018. The acquisition was completed on 14 March 2018.

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