

Coercion in the Human Trafficking Context

A WARNATH GROUP PRACTICE GUIDE



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The WARNATH GROUP

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PRACTICE GUIDE
by The Warnath Group

AT A GLANCE

Intended Audience:

- Investigators and prosecutors working on human trafficking cases.

Takeaway: Investigators and prosecutors must be aware of the many and various—and often subtle—forms of coercion human traffickers employ to compel victims to provide labor or engage in commercial sex acts.

In This Practice Guide:

- An examination of the types of coercion
- An examination of the recognized methods of coercion that are used by traffickers to compel victims to provide labor or services
- The international definition of coercion from the UN Trafficking Protocol
- The questions prosecutors need to ask victims to develop strong evidence of coercion, and how to use this evidence at trial

The Importance of “Coercion” in Anti-Human Trafficking Definitions?

International Human Trafficking Law, specifically the Palermo Protocol of 2002¹, defines human trafficking as involving three elements 1) an “action” which can be recruitment, transportation, transfer, harboring or receipt of persons; 2) the “means” by which the act is achieved, specifically by threat or use of force **or other forms of coercion**, abduction, fraud, deception, abuse of power or a position of vulnerability, and the giving or receiving of payments for benefits to achieve consent of a person having control over another; and 3) for the “purpose” of exploitation. Although most countries have their own national law, this international definition is quite frequently the starting point from which those laws are developed. Although there are multiple variations of national laws, coercion is in some form or another

¹ Article 3 of the United National Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

part of every law. The means element, which typically involves both defined and undefined forms of coercion, is often the most difficult element of the crime to prove.

In fact, under the Palermo Protocol, and the vast majority of national anti-human trafficking laws, the only time the prosecutor typically won't have to prove the "means" element or some type of coercion is if the victim is a minor, typically defined as under the age of 18.

Why Is It Important to Consider the Means of Coercion?

Human trafficking cases are often extremely complex, involving complicated relationships between the traffickers and their victims. These relationships may, at first glance, appear to be cooperative, mutually beneficial, even friendly. In some cases, the trafficker and victim may be distantly related, or sexually or "romantically" involved. There may not be evidence of force or the threat of force, the threatened abuse of the law or legal process, or physical restraint—the classic indicia of "Slavery" or "Involuntary Servitude." The victim may have had the opportunity to escape—that is, to walk away from the trafficker—and yet stayed. The victim may be making money, perhaps more money than he or she could have made in their home country or without the "sponsorship" of the trafficker. In short, it may seem as if the victim has consented to the work arrangement, and willingly continues to provide labor and services to the trafficker. Yet in many instances this impression is illusory, and it ignores the many and various subtle forms of manipulation used by traffickers to coerce victims into laboring or performing commercial sex acts.

Rarely is there just one reason that human trafficking victims feel compelled to work, unable to just say no to their traffickers. It is the exceptional trafficking case where the compulsion is explained by whips or chains. Most often traffickers employ multiple forms of coercion, so that analyzing the "means" of a trafficking case is a bit like assembling the pieces of a puzzle; no one piece of evidence explains the malicious complexity of the trafficker's scheme, or the psychology of the victims. Investigating the sources and consequences of coercion is a time-intensive effort, requiring patient and repeated interviews of the victims to determine which words or actions (or inactions) of the trafficker compelled them to provide their labor or services.

Throughout the world, investigators and prosecutors handle a steady diet of criminal offenses where the contours of the crime are obvious and well-established. The elements of a burglary or a battery or a bank fraud are clear. The victims of these crimes are plainly *victims*—people who can provide easily comprehensible accounts of the harm or loss—of their victimization. It becomes the primary focus of the investigator and the prosecutor to prove who committed the act, who did the victimizing. But in trafficking cases, proving who did the act is just the starting point, as the prosecutor must then develop the evidence of (and be prepared to explain to the court) the methods by which a trafficker has compelled a person to provide their labor or services. If the trafficker has held a gun to the victim’s head, or chained them to a work station, the means of compulsion are apparent, and the prosecutor easily comprehends that there is a prosecutable case. However, where the victim is coerced to work by means of a trafficker’s scheme or plan to instill in the victim’s mind with **fear of serious harm**—whether physical, psychological, financial or reputational—the prosecutor may fail to understand that a crime has been committed and will (inappropriately) decline the case. Accordingly, prosecutors must become familiar with the various types of coercion employed by traffickers, and with the ways in which criminal statutes and case law have recognized and responded to these increasingly sophisticated and subtle “means.”

Evaluating Coercion with an Eye to the Victim’s Vulnerabilities

The international community has wrestled with defining coercion. In the Palermo Protocol, the UN recognized the concept of “abuse of a position of (victim) vulnerability,” and many of the national anti-trafficking laws that flowed from the Palermo formulation have used this language. This is not the identification of a specific form of coercion, but rather a recognition that traffickers prey on the most vulnerable among us, that this vulnerability can take many forms, and that traffickers often match the means of coercion to the victim’s specific vulnerabilities. To be sure, very few doctors, lawyers or government ministers are victims of human trafficking; and, it is true that victims are often vulnerable by dint of poverty, lack of education and/or opportunity, poor health care and social upheaval. Yet, it is also true that many victims of human trafficking are vulnerable in less obvious ways—vulnerable because of psychological or familial issues, or due to complex social/cultural factors. Some national statutes list victim vulnerabilities—gender, age, and mental health status are among the most common. Other statutes use the concept of victim vulnerability but do not define or otherwise

clarify what constitutes a vulnerability. Regardless of the specific statutory language, investigators and prosecutors must not assess the “means of coercion” in a vacuum—it is essential (and consistent with existing international law) that they conduct their evaluation of the evidence with an eye to the victims’ vulnerabilities.

Increasingly, prosecutors offer expert witnesses to educate juries and judges on the cultural, psychological and financial vulnerabilities of trafficking victims, as well as on the often-sophisticated means by which traffickers exploit these vulnerabilities.² Without a clear understanding of *what* made the victim vulnerable, a trier of fact cannot fully appreciate *why* the traffickers’ methods were coercive to that particular victim.

Despite the increased awareness and identification of these nonphysical means of coercion, it is difficult to neatly or comprehensively catalogue them, as each trafficking case is singular, in the sense that traffickers tailor their methods—identifying and threatening the sort of “serious harm” that will further their nefarious goals—to the unique characteristics and fears of their victims. Thus, while we can identify general categories, investigators and prosecutors must be ever alert to the covert and individualized ways traffickers achieve their ends.

Dealing with the Issue of Consent

The Palermo Protocol and many national laws clearly and unequivocally state that consent is irrelevant (as a defense) in cases where the victim is a child, or where **any** of the specified means including coercion have been used against an adult. Sometimes the victim will blame themselves for what happened because they “agreed” and feel like they made a bad choice. Investigators and/or prosecutors may need to explain to the victim, as well as the trier of fact, that consent is irrelevant under the law, and may also have to explain why it is irrelevant – that it wasn’t a knowing and voluntary consent because the victim only consented as a direct result of the trafficker’s coercion or other prohibited behavior.

² For more information the use of expert witnesses see the Practice Guide *How Using Expert Consultants & Expert Witnesses Can Strengthen Your Human Trafficking Case* available at <http://www.warnathgroup.com/using-expert-consultants-expert-witnesses-can-strengthen-human-trafficking-case/>.

Common (and uncommon) Means of Coercion

Traffickers almost never use just one form of coercion. Most often, they will mix a cocktail of coercion, pairing the ingredients with the vulnerabilities of their victims. It is impossible to list all these ingredients, just as it is impossible to comprehensively categorize the victims of human trafficking. However, investigators and prosecutors must be aware of the primary forms of coercion used by human traffickers, as identified in international human trafficking prosecutions in recent years. It is important to keep in mind that the presence of one or more of these factors will not guarantee a successful prosecution, just as the absence of one or more of these factors will not doom a case. Trafficking cases require prosecutors to analyze the totality of the evidence—carefully examining all aspects of the relationship between trafficker and victim—to determine whether they have evidence sufficient to prove the case. Listed below are the most frequently employed means of coercion.



Force and Threats of Force / Climate of Fear: Although recent developments in human trafficking enforcement have unmasked less obvious, nonphysical means of compelling the victim, it remains true that many cases involve beatings or threatened beatings of trafficking victims. Traffickers—particularly in the sex trafficking context—still often coerce their victims by beatings or threatened beatings. Even when the trafficker has not laid a hand on the victim, or directly threatened force, he may

mention, possess or display a weapon that frightens the victim, compelling the labor. Frequently, traffickers mention the beatings or punishments of previous victims, creating in the mind of the workers the reasonable expectation that the same fate will befall them if they fail to perform the work or provide the services. Even more potently, when a trafficker actually uses force, or threatens force, against one worker, other workers come to believe that they too will be beaten. Courts in numerous countries have recognized that workers who have not been the victim of force or direct threats of force are coerced when traffickers deliberately create this “climate of fear.”



Sexual abuse/Promises of Love: It is frequently true, both in forced labor and commercial sex trafficking cases, that the trafficker will use sexual assaults, or the threat of sexual assault, to coerce victims into servitude. And, as is true when traffickers beat one victim in the presence of other victims—coercing the entire group by creating a climate of fear—traffickers will use past sexual assaults as a means of coercion against the new victims. Paradoxically, sex traffickers will often lure victims into a coercive scheme by

fostering a romantic/sexual relationship, and then force the victims to continue working for them by threatening to withhold their “love” or sexual attentions. Not surprisingly, it is often very difficult for victims of these schemes to come to terms with the reality of their trafficker’s intentions, and to relate the details of their relationship with the trafficker to investigators and prosecutors. Accordingly, investigators and prosecutors working on such cases will need to be extremely patient in interviewing victims who have been coerced in this manner, and they may need to use expert witnesses (psychologists and social workers) to explain these tangled relationships to a judge or jury.



Exploitation of drug addiction: Persons who are addicted to drugs or alcohol are easy targets for traffickers, particularly those operating in the commercial sex trade. In some instances, traffickers introduce drugs to previously “clean” victims—particularly to young women they want to force into commercial sex work. Recently, there have been numerous successful prosecutions where traffickers control of the victim’s access to a supply of drugs (and the threat of cutting off that access) was the primary evidence of coercion.

Though seemingly difficult to prosecute a case where the victims are breaking the law by obtaining and using illegal drugs, judges and juries have been receptive to the argument that the deprivation of drugs for an active addict (or threat of such deprivation) is “a threat of serious harm,” both medical and psychological, and that traffickers know it. Again, the use of medical and psychological experts is crucial in these cases, as judges and juries must be educated on the horrors and physical dangers of drug withdrawal.

International law also recognizes the exploitation of victims based on addiction or other psychiatric/medical conditions. This is one example of what the U.N.’s Trafficking in

Person’s Protocol meant by “abuse of a position of vulnerability.” Despite differences in trafficking laws across the globe, most jurisdictions have recognized the probative value of evidence of this type of victim susceptibility to coercion.



Exploitation based on age, disability or socio-economic status:

International courts have also recognized that traffickers often select very young, elderly, or mentally disabled persons precisely because they are in a “position of vulnerability” and abuse of that vulnerability can be an easy path to coercion. As mentioned above, in cases involving minors there is typically no need to prove means, in part because there is a presumption of coercion based upon the youth of victims. This is true of many national anti-trafficking laws. Moreover, even where a person has reached legal adulthood, but is in their late teens or early twenties, some courts have recognized these victims’ special vulnerability to coercive schemes.

Similarly, many courts have acknowledged the evidentiary value of a victim’s developmental disabilities or psychiatric history in proving up a pattern or scheme of coercion. Sadly, many traffickers select these people precisely because their limitations place them in a “position of vulnerability.” There have been many cases where the means of coercion used by traffickers would not have forced a person of normal intelligence or psychiatric condition to work or provide services, but their schemes worked precisely because of the victims’ gullibility or insecurities. Once again, prosecutors were able to prove this vulnerability with the aid of expert medical witnesses.

Somewhat subtler—but no less important—is proving coercion based on the low or disadvantaged socio-economic status of the victim. Naturally, poverty is a double-edged sword for an investigator or prosecutor, as the fact that the victim was poor and in need of a job can undercut the evidence that the trafficker had to force that person to work. However, numerous courts in the United States have pointed to very low pay and horrible working conditions—the creation of a regimen or scheme under which only a financially desperate person (or a person in “a position of extreme economic vulnerability”) would labor—as strong evidence of coercion.

Another way to think about this, as expressed in the travaux préparatoire to the Trafficking Protocol, is that abuse of a position of vulnerability, including economic vulnerability, refers to a situation in which the person involved has no real and acceptable alternative but to submit to the exploitation. A skillful prosecutor should be able to elicit testimony from the victim that they continued working or accepted the bad working conditions because they had no real or acceptable alternatives. This may be particularly true of someone who is provided transportation to a foreign country and has absolutely no social or economic resources of their own that would enable them leave the exploitive situation.



deprived victims of access to persons who speak their language, it is evidence of abuse of victim vulnerability.³

Exploitation of Language Differences: Frequently, persons are recruited in one country and transported to a new country where their language is not spoken. Traffickers will deny these victims access to others who speak their language, preventing them from complaining of their condition, making them feel as if their situation is hopeless. This linguistic isolation is a tool of coercion, and if prosecutors can demonstrate that traffickers intentionally



Debt coercion: When a victim is recruited to leave their home country to work abroad, the traffickers will normally pay the costs of transportation (airfare, expenses and cost of necessary documentation); or—where the entry is illegal—they will pay the smuggling fees. Even in the domestic sex trafficking context, traffickers frequently “give” or “loan” the victims money, often to support the victim’s drug addiction, or to satisfy other debts. The trafficker instructs the victims they can “work off” the debt, yet rarely are the terms of repayment written or even specified. In many instances, the trafficker will greatly inflate the cost of transportation and support; so even where the victim works long hours for

³ For more information on working with victims of trafficking and interpreters, please see the Practice Guides *Selecting, Vetting, and Preparing Interpreters for Human Trafficking Cases* available at <http://www.warnathgroup.com/practice-guide-selecting-vetting-interpreters-human-trafficking-cases/>, and *Interpretation Logistics for TIP Cases* available at <http://www.warnathgroup.com/practice-guide-interpretation-logistics-tip-cases/>

little pay, the debt will keep getting larger, creating an inescapable debt burden. The trafficker tells the victim that they are not free to leave until this shifting and amorphous amount is paid. Victims feel locked into these blatantly unfair and fraudulent agreements, and they will work until they have satisfied the alleged debt. Sometimes, that day never comes.



Exploitation based on immigration status: Many trafficking victims in the U.S. and abroad were smuggled into the jurisdiction where they are working, or they have overstayed (or worked in violation of) their visas. Thus, traffickers use the victims' undocumented status to coerce these persons to work by threatening them with deportation or arrest by immigration authorities. Often, these threats are baseless, as the last thing traffickers would want is the notification of the authorities, as they too could be arrested. However, in the minds of fearful and unsophisticated persons who entered or stayed in a country without proper government authorization these threats may seem credible. This also crosses over into the area of “abuse of the legal process” further explained below.



Exploitation based on threats of “the dangers of escape”: Very often, traffickers fabricate or exaggerate the risks victims would face if they left their employ. This is especially true in domestic worker cases, where wealthier, more sophisticated persons import members of a lower socio-economic group, often from different countries or cultures, to be servants in their home. In many such cases, traffickers have convinced their victims that leaving the home would result in serious injury or death at the hands of criminals or the authorities. Although these statements are factually untrue, even fanciful, they are often believed by naïve and inexperienced victims, and are, therefore, potent weapons of coercion.



Isolation/Restrictions on Freedom of Movement: It is apparent that severe restrictions on a person’s freedom, such as locking victims into a house, room or worker’s dormitory, or chaining them up while they work, are an effective means of compulsion. Less obvious are situations where traffickers create a work and residential environment where persons have minimal contact with the outside world and are closely supervised, so that they have little or no opportunity to seek help. In the labor trafficking context,

traffickers sometimes maintain a “company town” setting, providing the basics of everyday existence so that workers need not have contact with the community at large. Domestic servants are often told to remain in the house or to avoid interaction with neighbors. Victims are ordered to avoid socializing with outsiders, and prohibited from using the telephone, internet or other forms of communication. When visitors do come to the house, the domestic servants are told not to speak, or they are told by the traffickers how to respond if anyone asks about the terms of their employment and living conditions. Prosecutors must pay close attention to these instructions and fabrications by the traffickers, as they are not only evidence of the victim’s confinement, but they are powerful evidence of the trafficker’s “consciousness of guilt.” In the sex trafficking context, a more trusted senior worker is often recruited (and rewarded) for supervising the other sex workers, making sure that they have little or no access to the outside world. This might seem counter-intuitive, in that the whole point of exploiting these victims is to maximize their sexual contacts with paying customers. However, the trafficker will normally instruct the victims not to talk with customers about the circumstances or conditions of employment, and the trafficker or his surrogates—his “bottoms”—will closely monitor the length and place of the client contacts, while restricting the victims’ movement when not working.



Deprivation of Contact with Friends or Family: Not only will traffickers limit social contacts outside of the home or workplace, but they frequently prevent, or attempt to deter, the victim from maintaining contact with friends or family. As many victims are from another country, and thus have no access to a cell phone or other means of communication, this is easy enough for the trafficker to control.



Long Hours and Extreme Working Conditions: Clearly, the above elements are evidence of unfair (and perhaps illegal) labor practices, but are they evidence of trafficking? After all, many workers, throughout the world, do hard, distasteful work for relatively poor wages; this is especially true in developing countries—where many trafficking victims come from—so traffickers will say that poor pay and conditions are what the victim “bargained for.” But prosecutors should be mindful that the existence of these elements can be strong evidence of a coercive environment, not simply because it supports the argument that “the workers must have been coerced because why else would someone work these hours for little money under these circumstances,” but because the conditions themselves *deprive the victim of the freedom of choice*. Prosecutors should ask questions that probe the ways in which the victim’s will to resist was worn down by long work hours and onerous working conditions.



Deprivation of Wages: Traffickers will withhold promised wages to force a victim to continue to provide labor or services. The victim may be destitute, relying on the wages for sustenance, or to send home to family members, and, accordingly, will continue to work in the desperate hope that the trafficker will eventually pay up. Because a pattern of broken (payment) promises can be persuasive evidence of the trafficker’s scheme to coerce workers, prosecutors should carefully question victims about withheld or delayed wages.



Abuse of Legal Process: In some situations, traffickers operate in league with government officials, and can exercise control by means of genuine threats of arrest or deportation by these officials. However, even where traffickers have no real connection or influence with government officials, they can and do coerce victims by making false claims of arrest or deportation. One variation on this theme in the sex trafficking context is the trafficker’s promise of protection from arrest or harassment by authorities—persons engaged in commercial

sex work are, after all, in many places breaking the local law, and are often fearful of arrest. This can be true even where they have been coerced by other means into such work and are fearful of the trafficker. But once engaged in that work, they feel unable to turn for help to the police or other law enforcement, as they “have broken the law.” Traffickers will play on this fear to force the person to continue to work. Prosecutors must be aware of this dynamic—of these schemes by traffickers to use the vulnerability they themselves have created as a means of coercion—and not be misled into believing that the victim’s failure to seek help from law enforcement belies their victimization. In the labor trafficking situation, the victim may be threatened with deportation, an extended deportation process during which there would be no opportunity to earn money or have contact with the family, arrest, or a long jail sentence. In some countries this kind of coercion where the trafficker uses threats of turning someone into law enforcement as a kind of blackmail for personal gain, or “abuse of the legal process”, is a clearly delineated type of coercion in the national law.

Accordingly, even where victims repeat outrageous (and untrue) statements by their traffickers concerning their “pull” with government officials, investigators and prosecutors should not dismiss or minimize the evidentiary value of these assertions, as traffickers adroitly exploit victims’ cultural/legal naiveté.



Confiscation of Passports and Travel Documents:

Traffickers commonly take the passports or other travel documents from their victims, claiming that they held the documents for safekeeping. Prosecutors can belie these claims by showing that the victim never asked the trafficker to keep their documents or that the victim asked for the documents and they were not returned. A trafficker's failure to comply with a victim's request for his/her passport is convincing evidence of coercion as it severely limits the victim's ability to travel freely, and the victim is often unwilling to leave without their critical identification documents. This unlawful retention of passports or travel documents, or even purported passports or travel documents, is sometimes written into national laws as a separate and distinct offense, or a method of coercion.



Threat of Reputational Harm: It is frequently the case that the trafficker comes from the same home country as his/her victim(s), and that the trafficker maintains powerful contacts back home. When this is the case, a trafficker can force a person to labor or provide services by threatening harm to a victim's family member. A variation on this method of coercion is where a trafficker threatens to shame the victim in the eyes of friends and relatives in the home country; this means of coercion is most effective where the





victim has been forced into commercial sex work, and the trafficker coerces the victim to continue working with threats of disclosing the prostitution to friends and family back home.



Deception as to the Nature of the Work: Traffickers often lie to victims (and their families) about the type of the work they will be performing, the conditions under which they will be living, and the amount of pay they will receive. Once victims arrive at the work place they are stuck, unable to complain of deception, and will simply resign themselves to the new terms under which they must labor or provide services. This is especially true for victims of sex slavery,

who may have been promised jobs as restaurant workers or similar jobs, only to learn upon arrival that they are sex workers.

Takeaways and Tips for Prosecutors and Investigators

	You CAN successfully prosecute a trafficking case without cuts and bruises or physical restraint, as most coercion is not physical in nature.
	You must spend the time with your victims—over multiple sessions—exploring the details of their relationship with the trafficker, as there are often many aspects of the coercion that victims are afraid or ashamed to speak about. It is up to you to try and draw out information on the ways the trafficker manipulated them. The victim may be so awash in guilt and shame that they primarily blame themselves. Ask the victim questions about what they thought would happen if they tried to leave, refused to work or requested, or spoke up about conditions. ⁴
	Don't be misled into thinking the labor was voluntary because the victim initially consented to work for the trafficker—many victims are lied to and consent, others start laboring with the false hope that “things will work out,” and the coercion may not come until later.
	When interviewing a victim, think carefully about their personal characteristics—personal, cultural, financial, familial—that put them in a “position of vulnerability.” Ask the victim (non-leading) questions aimed at culling out words, actions, or patterns of behavior by the trafficker designed to exploit those vulnerabilities.

⁴ For more information on preparing victims to testify as a witness during trial, please see the Practice Guides *Prosecutor Trial Preparation – Preparing the Victim of Human Trafficking to Testify* available at <http://www.warnathgroup.com/practice-guide-prosecutor-trial-preparation-preparing-victim-human-trafficking-testify/> and *Prosecutor Trial Preparation – Direct Examination Questions for the Victim* available at <http://www.warnathgroup.com/practice-guide-prosecutor-trial-preparation-direct-examination-questions-for-the-victim/>.



Don't assume that the victim was not coerced to labor simply because the trafficker's actions, threats or scheme would not have caused the "typical person" to work involuntarily. Trafficking victims are often selected because they are unlike the typical worker in your jurisdiction, more susceptible than average to various forms of subtle psychological or financial coercion.



Don't dismiss the possibility of prosecution because the victim was "free to come and go." Most victims are not chained or locked, and many have access to people to whom they could report their situation. Keep in mind that often victims don't run or report because the trafficker has manipulated them into believing that they will suffer serious harm (physical, reputational, financial) if they do so. It doesn't matter that the harm is real or imagined, so long as the trafficker has the coercive intent.



Remember that not all the above-listed forms of coercion will exist in every trafficking case, and that no one factor will completely explain the reasons victims worked against their will. You must examine the victim's situation holistically, understanding that coercion is often explained by a host of small threats and acts, which in the aggregate overcame the victim's ability to resist.



Inquire about the trafficker's treatment of other workers, and probe as to how this affected the victim's situation. Remember that establishing a pattern of conduct by the trafficker can be key to proving intent to coerce by threatening serious harm.

Resource Links for Additional Information:

- Gallagher, Anne. “Abuse of a position of vulnerability and other “means” within the definition of trafficking in persons.” Issue Paper. United Nations: New York, 2013. Available at: https://www.unodc.org/documents/human-trafficking/2012/UNODC_2012_Issue_Paper_-_Abuse_of_a_Position_of_Vulnerability.pdf
- United Nations Office on Drugs and Crime, Vienna. “An Introduction to Human Trafficking: Vulnerability, Impact and Action.” Background Paper. United Nations: New York, 2008. Available at: https://www.unodc.org/documents/human-trafficking/An_Introduction_to_Human_Trafficking_-_Background_Paper.pdf
- Cases involving Drug addiction:
 - Durr, Matt. “Battle Creek man gets 45 years in prison for sex trafficking conviction.” *Michigan Live*. 13 April 2018. Available at: https://www.mlive.com/news/index.ssf/2018/04/battle_creek_man_gets_4_5_years.html
 - “Heroin Dealer Convicted by Jury of Sex Trafficking and Drug-Related Offenses.” Press Release. U.S. Department of Justice, Office of Public Affairs. 15 July 2016. Available at: <https://www.justice.gov/opa/pr/heroin-dealer-convicted-jury-sex-trafficking-and-drug-related-offenses>
 - “Lutz, Fla., Man Convicted on Drug Distribution and Sex Trafficking Charges.” Press Release. U.S. Department of Justice, Office of Public Affairs. 6 November 2013. Available at: <https://www.justice.gov/opa/pr/lutz-fla-man-convicted-drug-distribution-and-sex-trafficking-charges>

- Cases involving long hours and extreme working conditions:
 - **Belgium:** “Case No. 2012/3925.” First Instance Court of Gent, 19th Chamber. Sentence Date 5 November 2012. Accessed on SHERLOC Case Law Database; UNODC. Available at: https://sherloc.unodc.org/cld/case-law-doc/traffickingpersonscrimetype/bel/2012/case_no.20123925.html?tmpl=old
 - **Norway:** “Case 0715.” Drammen District Court. Date of Decision 2 July 2015. Accessed on SHERLOC Case Law Database; UNODC. Available at: https://sherloc.unodc.org/cld/case-law-doc/traffickingpersonscrimetype/nor/2015/case_0715.html?lng=en&tmpl=html
 - **United States:** “United States v. Farrell.” U.S. Court of Appeals, Eighth Circuit. Decided 17 April 2009. Accessed on FindLaw. Available at: <https://caselaw.findlaw.com/us-8th-circuit/1151530.html>

Acknowledgements

For more information about coercion in the human trafficking context contact the Warnath Group at info@WarnathGroup.com. The Warnath Group thanks Gerard Hogan, former Federal Prosecutor and Senior Litigation Counsel at the U.S. Department of Justice (DOJ) Civil Rights Division and former Maryland State Prosecutor, for his contribution to the preparation of this paper. To access additional practical tools and resources, visit our website at www.WarnathGroup.com. Studies and background material are available at www.NEXUSInstitute.net.

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