

HUMAN TRAFFICKING IN MINNESOTA

A Report to the Minnesota Legislature
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EXECUTIVE SUMMARY

Trafficking in persons is a global and domestic problem requiring a comprehensive and coordinated response that prevents trafficking, prosecutes traffickers, protects victims and promotes partnerships among agencies. The *Trafficking Victims Protection Act of 2000* (re-authorized in 2003, 2005 and 2008) is the United States' primary tool in combating human trafficking.

In 2009, Minnesota Statute 609.322 *Solicitation, Inducement, and Promotion of Prostitution* was amended to include sex trafficking. Minnesota law focuses on the actions of the trafficker; if he/she received, recruited, enticed, harbored, provided or obtained by any means an individual to aid in prostitution, then sex trafficking has occurred. This law is widely considered more effective than the federal law, which requires a determination that force, fraud or coercion was used to commercially, sexually exploit a person over the age of 18.¹

In 2011, Minnesota passed the *Safe Harbors for Sexually Exploited Youth* law, which excludes sexually exploited youth under the age of 16 from the definition of a delinquent child; creates a mandatory first-time diversion for any 16- or 17-year-old who has been exploited in prostitution; adds the definition of sexually exploited youth to Minnesota's child protection code; increases penalties against commercial sex offenders²; and directs the commissioner of public safety to create a statewide, victim-centered response for sexually exploited youth.

Human trafficking, by its very nature, is a hidden crime whose victims often go unidentified, misidentified or undiscovered. In addition, when victims are correctly identified and assisted, there is no systematic or centralized way to count them. Therefore, assessing the level of victimization in Minnesota is difficult.

This is also true with regard to compiling statistics on human trafficking in the U.S. or around the world. The U.S. State Department has estimated that between 600,000 and 800,000 people are trafficked across international borders each year, while the International Labor Organization (ILO) estimates that approximately 12.3 million people at any given time are victims of human trafficking. The State Department also estimates that between 14,500 and 17,500 people are trafficked into the United States each year. The United States is just beginning to address domestic trafficking, and data on the prevalence of trafficking within the country is unreliable even when it is available.

This report is the fifth to be completed under Minnesota Statute 299A.785 and the second to be completed since the statute was amended, allowing for biennial completion. This statute requires a study of the extent and type of trafficking occurring in Minnesota. As stated earlier, there is no systematic or centralized way to count victims of human trafficking. Therefore, to meet the obligations imposed by legislation, online surveys were completed by service providers (N=103) and law enforcement officers (N=202) across the state.

Sixty-one percent (N=63) of service providers have served at least one victim of human trafficking in Minnesota. Nine percent of law enforcement respondents indicated their agency has had either a labor- or sex-trafficking arrest or investigation.

At the time of the survey, service providers reported working with 14 adult male, 28 adult female and 29 child-labor trafficking victims. They also reported working currently with one adult male, 258 adult

¹ Force, fraud or coercion is not required for the sex trafficking of a minor.

² This term is used in lieu of the more common term "john".

female, five juvenile male, and 88 juvenile female sex-trafficking victims. Law enforcement reported no current labor-trafficking investigations and seven current cases of sex trafficking. In 2011, the State Court Administrator's Office reported 614 trafficking related charges and 390 trafficking related convictions. The majority of these charges and convictions were under Minnesota Statute Section 609.324 (*Other Prostitution Charges*).

Trafficking victims in Minnesota have been identified from all over the world, the country and the state. Domestically, victims of labor trafficking and sex trafficking have been identified from Red Lake, St. Paul, Minneapolis, Duluth, Pillager, Maplewood, Stillwater and Mankato. Other cities and states mentioned include Chicago, Las Vegas, New York, Wisconsin, South Dakota, Colorado, Georgia and Missouri, along with the territory of Puerto Rico. Internationally, human trafficking victims have been identified from Haiti, Russia, Venezuela, Laos, Guatemala, the Ukraine, Rwanda, Nigeria, India, and China.

Labor trafficking victims in Minnesota were reported to have been exploited in a variety of ways but most often as domestic workers such as nannies or housekeepers. Other types of labor exploitation included agricultural work, restaurant work and hotel work. Sex trafficking victims were most often exploited through systems of prostitution, servile marriage, forced stripping³ and pornography.

LEGISLATIVE REQUIREMENT

In 2005, the Minnesota Legislature passed Minnesota Statutes 299A.785 requiring the Minnesota Department of Public Safety to complete annual studies on human trafficking in Minnesota. Specifically, the statute requires this report to include:

- Numbers of arrests, prosecutions and successful convictions of traffickers and those committing trafficking related crimes
- Information on the number of trafficking victims, demographics, the method of recruitment and the method of discovery
- Trafficking routes and patterns, states or countries of origin, and transit states or countries
- Methods of transportations used in trafficking
- Social factors that contribute to trafficking

This report was completed each year from 2006–2008 and in 2010. During the 2008 legislative session, the statute was amended requiring this report to be completed biennially.¹ The 2012 report is the fifth in response to this legislation and the second under the new biennial reporting schedule.

³ Stripping is a legal form of employment in Minnesota; forced stripping can also be counted as a form of labor trafficking.

INTRODUCTION

Despite the abolition of slavery in the United States and in almost all countries around the world, trafficking in persons continues to be one of the fastest growing criminal enterprises, ranking second in illegal profits right behind the drug trade and just ahead of the illegal arms trade.ⁱⁱ

There is no single definition of human trafficking that encompasses all the forms modern-day slavery can take. However, human trafficking is a crime that exploits people for profit and deprives them of their basic human rights.

The United States' *Trafficking Victims Protection Act of 2000* (TVPA) defines severe forms of human trafficking as:

- a) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or
- b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

The *United Protocol To Prevent, Suppress And Punish Trafficking In Persons, Especially Women And Children, Supplementing The United Nations Convention Against Transnational Organized Crime*ⁱⁱⁱ defines human trafficking as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs."

A victim of human trafficking is anyone forced into labor and/or commercial sexual exploitation. Victims can be foreign nationals or U.S. citizens. The crime of human trafficking does not have to include movement or the transportation of people across national or international borders.

Labor Trafficking

Minnesota law defines labor trafficking as the recruitment, transportation, transfer, harboring, enticement, provision, obtaining or receipt of a person by any means, for the purpose of debt bondage or forced labor or services, slavery or practices similar to slavery; or the removal of organs through the use of coercion or intimidation or receiving profit or anything of value, knowing or having reason to know it is derived from an act described in clause (609.281).

The type of labor trafficking victims experience can vary across nations and can include forced labor, bonded labor, debt bondage, child labor and child soldiers. The 2009 Trafficking in Persons Report^{iv} finds the current global economic crisis has resulted in a decrease in demand for global labor and concurrent increase in a supply of workers who are willing to take great risk for employment opportunities, creating a dangerous situation for migrant and other vulnerable workers.

Forced labor (also known as involuntary servitude) is the most prevalent form of labor trafficking and is hard to detect as it often involves individuals, rather than organized crime networks, subjecting other individuals to servitude. This is particularly true for victims of involuntary domestic servitude, forced to work in homes as servants and child caretakers. These workers are isolated and vulnerable since authorities cannot easily enter private property, and domestic workers often have less legal protection than foreign workers in other sectors.

Bonded labor involves exploiting the debt a worker may have assumed as a condition of employment or because of debt inherited from past generations. Migrant workers are especially vulnerable to this type of labor exploitation due to contract abuse, inadequate laws governing the recruitment and employment of migrant workers, and the intentional imposing of outlandish costs and debts on workers in their home countries. This kind of exploitation also affects workers whose illegal immigration status is used as a method of control. In addition to traffickers exploiting people's legal status, traffickers use victims' language barriers, poverty, isolation and fear of authority to keep them under control.

While children may engage in light work, the ILO provides a universal definition of the worst forms of **child labor**^v to include "all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor" involving children. The ILO also defines child labor^{vi} as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. **Child soldiers** are illegally recruited, often through force, for labor or sexual exploitation in conflict areas. Children are used as soldiers, but also as cooks, messengers, servants and spies. Both boys and girls are often sexually abused as well.

Sex Trafficking

According to the federal law (The Trafficking Victims Protection Act of 2000), sex trafficking is a crime in which a commercial sex act is induced by force, fraud or coercion, or in which the person to perform such an act is under the age of 18. By examining the levels of force, fraud or coercion, the federal law, in essence, is evaluating the "consent" of the victim. Minnesota's sex trafficking law instead focuses on the behavior of the trafficker, determining whether that person recruited, received, harbored or transported another person for the purpose of prostitution. The Minnesota law recognizes that a person can never consent to being sexually exploited.

While anyone can be a victim of sex trafficking, most are women and girls. Sex trafficking and labor trafficking can co-occur, with sex trafficking victims sometimes held in debt bondage. Sex trafficking can be any kind of commercial sexual exploitation, including prostitution, pornography, stripping, military prostitution and sex tourism.

The costs of human trafficking are high. In addition to serious physical- and mental-health costs to victims, trafficking is a grave human rights violation that deprives individuals, communities and countries the opportunity to reach their full potential. Economic uncertainty, demographics and other sociological factors, such as a lack of education and the universal desire to improve one's life, contribute to the vulnerability of people to trafficking. While these factors contribute to the supply side of human trafficking, the desire for free or cheap labor, the clients of sex workers, and the existence of sexism and racism all work together to create the demand.

It is important to understand that human trafficking, especially labor trafficking, can occur even when the victim has given prior consent to work. If a worker wishes to stop working because conditions or

wages are not as promised and the employer forces the worker to remain in service, trafficking has occurred. In addition, prior work history does not change one's status as a victim of human trafficking. This is especially relevant for those who are vulnerable because of their voluntary involvement in the sex industry or in migrant agricultural work.

National and International Estimates of Human Trafficking

Determining the number of individuals trafficked both internationally and nationally is challenging. Most numbers of victims reported are actually estimates, and the methods used to determine these estimates are not fully developed or defined^{vii}, making the true scope of human trafficking an unknown.

The U. S. State Department has estimated that between 600,000 and 800,000 people are trafficked across international borders each year, while the ILO estimates that approximately 12.3 million people are in some type of human trafficking situation (including forced labor, child labor, sexual servitude, bonded labor or involuntary servitude) at any given time.

The U.S. State Department also estimates that between 14,500 and 17,500 people are trafficked into the United States each year. Until recently, much of the United States' work on human trafficking has focused on international trafficking, with little attention paid to domestic trafficking. However, the State Department's 10th annual *Trafficking in Persons Report* for the first time ranked the United States with the same criteria used to rank other countries. This report finds that "More U.S. citizens, both adult and children, are found in sex trafficking than labor trafficking; citizen child victims are often runaways and homeless youth." ^{viii} And while we are beginning to investigate domestic trafficking, data on the prevalence of trafficking within the United States is uncertain and largely unavailable.

2012 SURVEY METHODOLOGY

In Minnesota, there is no systematic method for tracking any type of crime victimization. To count victims requires a survey of those most likely to come into contact with victims, most specifically crime-victim service providers, other social service providers and law enforcement. For this report, as in the past, data was gathered from service providers and law enforcement through an online survey. Additional information on trafficking and trafficking related crimes was compiled by the State Court Administrator's Office. While there is no required systematic way to track victims of crime, there is also no requirement that service providers and law enforcement respond to this survey. Therefore, this report should not be considered definitive, as it does not reflect the experiences of all Minnesota service providers and law enforcement agencies.

Additionally, information gathered from service providers and law enforcement is based on their own recall, perceptions and assumptions. With the exception of one or two programs, most crime-victim service providers do not routinely screen for, identify or track whether the clients they serve have been human trafficking victims. To provide the information for this report, most respondents simply think over the past year and estimate whether they have served a client who meets the legal definition of human trafficking victim.

Finally, the number of victims identified in this report is probably an under-representation of the extent of human trafficking in Minnesota. Trafficking is a complicated and hidden crime. There are many barriers in finding, identifying and helping victims — and often victims who do come in contact with a service agency are misidentified. This report does not attempt to estimate the number of human trafficking victims who have never had contact with a service provider or law enforcement agency.

TRAFFICKING RELATED CHARGES AND CONVICTIONS

This information is gathered from the State Court Administrator's Office. These numbers, while accurate, do not reflect the extent of trafficking and trafficking related crime in Minnesota. Most of the individuals involved in human trafficking and related offenses are never arrested, charged or convicted; those who do interact with the legal system are arrested, charged or convicted of different offenses.

Charges

Statute & Description ⁴	2005	2006	2007	2008	2009	2010	2011
609.33 Disorderly House	76	117	111	48	31	30	23
609.352 Solicitation of a Child	29	54	64	68	52	58	63
609.322 Solicitation, Inducement and Promotion of Prostitution; Sex Trafficking	19	29	29	27	26	17	38
617.245 and 617.246 Use of Minor In a Sexual Performance	13	25	10	16	17	15	12
609.27 Coercion	5	6	6	10	13	19	19
609.282 Labor Trafficking	--	1	--	--	--	--	--
609.324 Other Prostitution Charges	596	758	580	582	504	497	437
609.3243 Loitering with the Intent to Participate in Prostitution ⁵				37	35	37	21

Convictions

Statute & Description	2005	2006	2007	2008	2009	2010	2011
609.33 Disorderly House	8	31	18	5	3	4	10
609.352 Solicitation of a Child	14	21	16	22	11	14	24
609.322 Solicitation, Inducement and Promotion of Prostitution; Sex Trafficking	16	13	13	18	7	14	7
617.245 and 617.246 Use of Minor In a Sexual Performance	7	4	5	--	4	8	5
609.27 Coercion	6	2	3	--	2	10	7
609.324 Other Prostitution Charges	331	353	238	369	271	341	320
609.3243 Loitering with the Intent to Participate in Prostitution				20	15	10	17

⁴ Please see Appendix A for the definitions of these statutes.

⁵ Please note that the legislation soliciting this report did not require that information be provided on 609.3243 (Loitering with the Intent to Participate in Prostitution). This information was gathered for another purpose and included in this year's report.

SERVICE PROVIDERS' EXPERIENCES WITH HUMAN TRAFFICKING

For this report, 154 service providers across Minnesota were asked to complete an online survey about human trafficking. A total of 103 providers completed the survey for a 67 percent response rate.

As in all administrations of the survey, most of the 2010 respondents are domestic violence service providers (55 percent), sexual assault service providers (45 percent) or general crime victim service providers (44 percent).⁶ Not quite one-third (32 percent) of respondents provide legal services or advocacy, while more than one-quarter (27 percent) provide child advocacy or child abuse services. Survey respondents' service areas cover all 87 Minnesota counties.

Sixty-three of the 103 (66 percent) service providers who responded to the survey have served at least one victim of human trafficking. Of the 63 respondents who indicated they have served a victim of human trafficking, 27 percent have served a victim of labor trafficking, while 78 percent have served a victim of sex trafficking.

Labor Trafficking

The 17 service providers who have served a victim of labor trafficking indicated that they are currently serving 14 adult male, 28 adult female and 29 child victims, most of whom (N=26) are girls.

Respondents also indicated that in 2011, they collectively served approximately 12 adult male, 16 adult female and 24 child-labor trafficking victims, evenly split between boys and girls.

While movement is not required for trafficking to take place, it is important to understand where victims originate, to know where they could potentially be moved and the modes of transportation employed. Service providers who worked with labor trafficking victims in 2011 reported that victims were moved in a private vehicle (N=7), or by plane (N=3).

Four respondents reported working with domestically trafficked victims, while 12 reported clients who had been internationally trafficked for labor exploitation. Those respondents who have worked with domestically trafficked victims reported victims from North Dakota, Florida, Illinois, California, Washington, Texas, New York, New Jersey and Puerto Rico. Locally, respondents reported victims trafficked from Red Lake and St. Paul. International victims have been trafficked from Mexico (N=4), while three respondents listed victims from Saudi Arabia. Two respondents each mentioned victims from Russia and the United Arab Emirates. Other countries mentioned by one respondent each include India, the Philippines, Somalia, Vietnam, Columbia, Thailand, Rwanda, Malaysia, the Ukraine and Nigeria.

Service providers reported that the types of labor trafficking experienced by these victims include exploitation as a domestic worker, such as a maid or nanny (N=13⁷), labor trafficking in a factory (N=4), forced begging (N=2), hotel work (N=2). One respondent each mentioned labor trafficking victims exploited in restaurants, food processing, landscaping, and construction. The respondents reported that their clients were transported via a private truck, car or van (N=7), plane (N=3), or bus (N=2). Three respondents reported that the labor trafficking victims they served had not been transported.

⁶ Please note that respondents could offer more than one response to this question.

⁷ Please note that these data indicate the number of service providers reporting that their clients have experienced this type of labor trafficking, not the number of victims experiencing this type of trafficking.

It is important to understand how human trafficking victims come into contact with the people and organizations who can offer an effective intervention. Eight of the 17 service providers who have served a labor trafficking victim indicated that victims were referred to them through word of mouth or were current clients whose trafficking victimization was identified after a period of time working with them. Six service providers indicated that the labor trafficking victims they have served were referred through other social service agencies and three received law enforcement referrals.

Sex Trafficking

The 49 service providers who have served a victim of sex trafficking indicated that they were, at the time of the survey, serving 1 man, 258 women, five boys and 88 girls.

During 2011, service providers reported working with six men, 338 women, 36 boys and 207 girls who were victims of sex trafficking. The highest percentage of service providers reported working with sex trafficking victims exploited through prostitution (62 percent). Service providers also reported victims forced into servile marriage (34 percent), pornography (26 percent), and stripping or exotic dancing (23 percent).

Almost two-thirds (65 percent) of service providers who have served a victim of sex trafficking have served a domestically trafficked victim. Service providers have worked with clients domestically trafficked from around the state and country. Service providers specifically mentioned Minnesota (N=5) and St. Paul (N=2). Other areas of the state mentioned include Minneapolis, Duluth, Red Lake, Pillager and Mankato.

Respondents also mentioned domestically trafficked clients from Chicago (N=4), Wisconsin (N=4), Las Vegas (N=2) and South Dakota (N=2). Other states mentioned by one respondent each include Iowa, Texas, Washington, Colorado, Georgia, Missouri, Michigan, Puerto Rico and New York.

Twenty-nine percent of service providers who have served a victim of sex trafficking have served an internationally trafficked victim. Respondents mentioned working with clients internationally trafficked from the Philippines (N=4), Somalia (N=3), Mexico (N=3) and Thailand (N=2). One respondent each mentioned working with internationally sex trafficked victims from Haiti, Russia, Venezuela, Laos, Guatemala, the Ukraine, Rwanda, Nigeria, India and China.

More than half (57 percent) of the service providers who served a sex trafficking victim indicated that the sex trafficking victims they served were walk-in clients or current clients who sought services for other reasons. Victims were also referred to services by word-of-mouth or through other victims (36 percent) or through other social service referrals (33 percent). Twenty-nine percent of respondents received a referral from law enforcement and 18 percent received a referral for a sex trafficking victim from a hospital or doctor.

LAW ENFORCEMENT'S EXPERIENCES WITH HUMAN TRAFFICKING

A total 343 law enforcement personnel were asked to participate in this study. Fifty-nine percent (N=202) completed the survey: 128 police chiefs, 65 county sheriffs and nine other officers (police officers, investigative commanders, lieutenants, a chief deputy sheriff and a city clerk). About half (52 percent) of respondents indicated that their departments have fewer than 10 sworn personnel, while 31 percent have been 10 and 25 sworn personnel. Nine percent of respondents say their departments have

between 26 and 50 sworn employees, while eight percent report working in departments with more than fifty sworn personnel.

Labor Trafficking

Almost every law enforcement respondent (94 percent) indicated that the department does not have a unit or a person responsible solely for labor trafficking investigations.

Ten of the 202 law enforcement respondents indicated that they have investigated or arrested someone for a crime that involved labor trafficking. These ten agencies reported two total investigations of labor trafficking in 2011, resulting in one arrest. None of the law enforcement agencies reported a current labor trafficking investigation.

Sex Trafficking

Twelve law enforcement respondents (6 percent) indicated that they have investigated a sex trafficking case or arrested someone for a crime that involved a sex trafficking victim. These respondents reported nine sex trafficking investigations and three sex trafficking arrests during 2011. At the time of the survey, law enforcement reported working seven current cases of sex trafficking. Three respondents stated that their investigations involved juvenile sex trafficking victims and one agency reported they had sex trafficking cases involving Native American women or girls.

Seven of the 12 law enforcement respondents with sex trafficking investigations noted cases involving domestic sex trafficking occurring in Chisago County, Maplewood, Duluth, Stillwater and St. Paul. These cases were primarily prostitution cases (N=4). Two respondents reported international sex-trafficking cases from Laos and other unspecified East Asian countries. These cases involved prostitution, forced or servile marriage, and work in a massage parlor.

NATIVE AMERICAN VICTIMS OF TRAFFICKING

A 2009 report by the Minnesota Indian Women's Resource Center (MIWRC) found that the "...sex trafficking of Native women and girls is neither a new problem nor a rare occurrence. It is, however, a very complex problem in its origins, activities and solutions"^{ix} (p.99). MIWRC's report found that Native women and girls experience sexual violence more frequently than any other group of women in the United States and that there are many factors that contribute to Native women and girls' vulnerability to sex trafficking. MIWRC gathered information from 95 clients and found that 40 percent reported involvement in some type of commercial sexual exploitation and that 27 percent reported experiences consistent with being a victim of sex trafficking.

A 2011 report⁸ by the Minnesota Indian Women's Sexual Assault Coalition (MIWSC) and Prostitution Research and Education (PRE) found that half of the women in prostitution they interviewed (N=105) met the legal definition as a victim of sex trafficking. In addition, almost all (92 percent) reported being raped while in involved in prostitution and more than eight in 10 (84 percent) reported being physically assaulted.

The information collected for the MIWRC and MIWSC/PRE reports is important because the information was collected directly from Native women, by Native women. It should be understood that the

⁸ [http://www.miwsac.org/images/stories/garden percent20of percent20truth percent20final percent20project percent20web.pdf](http://www.miwsac.org/images/stories/garden%20of%20truth%20final%20project%20web.pdf)

information collected on Native American women and girls for this legislative report is most likely an under-representation of the issue. Data collection for this report is based on information provided by those serving crime victims, not specifically those serving Native people, and victims often choose to receive services from programs and providers who are culturally similar to themselves.

This legislative report found that 13 of the 49 respondents who have served a sex trafficking victim have worked with Native women or girls. These 13 service providers identified 110 adult and 35 juvenile Native American sex-trafficking victims. In order to understand the experiences of Native American victims of sex trafficking, it is important to ascertain how Native American victims are moved around, if at all. Four respondents indicated that the Native American victims they served had not been moved, while another four indicated that victims were moved from a Minnesota reservation to a metro area in the state (Minneapolis, St. Paul, Duluth, St. Cloud or Rochester). Three respondents noted that Native victims were moved from greater Minnesota to a metro area. An additional three had victims moved from a Minnesota reservation to another state.

Respondents were asked what is needed to best serve Native American sex-trafficking victims. Most often, respondents mentioned that Native American victims need culturally competent services. Respondents specifically mentioned that Native American victims need drug and alcohol services, employment services and culturally specific mentoring.

ⁱ Minn. Stat. §299A.785 Subd. 2 (2009)

ⁱⁱ *Polaris Project*. What is Human trafficking? Retrieved April 6, 2010, from http://www.polarisproject.org/index.php?option=com_content&task=view&id=26&Itemid=86

ⁱⁱⁱ *United Nations Office on Drugs and Crime*. United Nations Convention against Transnational Organized Crime and its Protocols. Retrieved July 21, from <http://www.unodc.org/unodc/en/treaties/CTOC/index.html>

^{iv} *U.S. Dept. of State*. Trafficking in Persons Report. (2009). Retrieved July 21, from <http://www.state.gov/g/tip/rls/tiprpt/2009/123123.htm>

^v *International Labour Organization*. Worst Forms of Child Labor. Retrieved July 21, from <http://www.ilo.org/ipec/facts/WorstFormsofChildLabour/lang--en/index.htm>

^{vi} *International Labour Organization*. About Child Labour. Retrieved July 21, from <http://www.ilo.org/ipec/facts/lang--en/index.htm>

^{vii} *Dept. of Health and Human Services*. (2009). Human Trafficking Into and Within the United States; A Review of the Literature. Retrieved July 13, 2010 from <http://aspe.hhs.gov/hsp/07/HumanTrafficking/LitRev/>

^{viii} *U.S. Dept. of State*. (2009). Trafficking in Persons Report. Retrieved July 13, 2010 from <http://www.state.gov/g/tip/rls/tiprpt/2010/>

^{ix} *Minnesota Indian Women's Resource Center*. (2009). *Shattered Hearts: The Commercial Sexual Exploitation of American Indian Women and Girls in Minnesota*.