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Human Trafficking of People with a Disability: An Analysis of State and Federal Cases

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Abstract

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Keywords

human trafficking, disability, prosecution, sex trafficking, labor trafficking

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ABSTRACT

The current academic discourse examining human trafficking is lacking in focus on survivors with a disability. The increased likelihood of abuse experienced by people with a disability is well documented in the research literature, and a small body of research indicates heightened sex trafficking victimization of minor girls with a disability. Yet, very little research specifically examines sex and/or labor trafficking of people with a disability, and no systematic research analyzes prosecuted cases of trafficking with disability as the focal point of analysis. Drawing from a content analysis of 18 federal and 17 state cases of human trafficking, the current study specifically aimed to increase our understandings of sex and labor trafficking involving survivors with a disability. The findings revealed the following patterns and themes: 1) the type of trafficking experienced (sex, labor, or both), 2) whether state level or federal cases 3) the types of disabilities identified among trafficking survivors, 4) the nature of the relationship between traffickers and survivors, 5) methods of recruitment, 6) case outcomes; and 7) demographic characteristics of traffickers and survivors (e.g., gender/citizenship). Implications include prevention efforts in the form of developmentally grounded sex education and healthy relationships curriculum for survivors with an intellectual disability, as well as specialized anti-trafficking training for those in legal, healthcare, and social services that is inclusive of people with a disability.

KEYWORDS

human trafficking, labor trafficking, sex trafficking, disability, prosecution, federal, state

THE CURRENT ACADEMIC DISCOURSE is lacking in focus on the experiences of survivors of human trafficking with a disability. The dearth of research in this area reflects and reproduces marginalization of people with a disability in anti-trafficking efforts. The extant research literature indicates heightened risk as well as heightened prevalence of human trafficking involving those with a disability (Reid, 2016; Franchino-Olsen et al., 2020; Martin et al., 2021). Yet, this body of research is extremely small, limiting understandings of dynamics of trafficking experienced by survivors with a disability. The available research literature that does include disability largely focuses on sex trafficking of minors (Reid et al., 2018; Franchino-Olsen et al., 2020; Martin et al., 2021). Research examining adult sex trafficking survivors and labor trafficking survivors with a disability is virtually non-existent. Gray literature (e.g., reports and white papers produced by organizations) exploring both sex and labor

trafficking is largely limited to a discussion of risk and overview of select prosecuted cases (National Human Trafficking and Disabilities Working Group, 2018; Polaris, 2019). While such work is important and offers a significant contribution to the academic and professional discourse in social and legal services, no systematic research analyzes federal and state cases of trafficking with disability as the focal point of analysis. The current study aims to contribute to the small body of research examining sex and labor trafficking of people with a disability, drawing from an inductive content analysis of state (n=17) and federal (n=18) cases of human trafficking (N=35).

DISABILITY AND HUMAN TRAFFICKING

The small body of research examining human trafficking of those with a disability is largely focused on sex trafficking of minors. A study reviewing case records from Florida (N=54) found that 28% of cases of girls who had experienced minor sex trafficking had an intellectual disability, while the national prevalence of intellectual disability is 1 to 3% (Reid, 2016). Multiple studies suggest sex trafficking is experienced at heightened rates by those with intellectual and physical disabilities (Reid et al., 2018; Franchino-Olsen et al., 2020; Martin et al., 2021). Polaris (2018) indicated that from 2015-2017, 2,116 potential victims were uncovered in its hotline statistics who had a pre-existing health concern or disability before they experienced trafficking, including physical disability, mental health diagnosis, substance use disorder, or intellectual or developmental disability. This data are limited in that it is rather broad, and does not disaggregate by these categories, although it does establish the presence of survivors with disabilities among trafficking survivors engaged with the national hotline.

A study analyzing data from the National Longitudinal Study of Adolescent to Adult Health, a large nationally representative sample of in-school adolescents, examined bivariate associations between physical disability, low cognitive ability, and minor sex trafficking among girls (Franchino-Olsen et al., 2020). The researchers found girls with both physical and cognitive disabilities had a significantly higher prevalence of sex trafficking than peers without disabilities. The prevalence of sex trafficking was highest for those with severe physical disabilities, specifically 11.79% of those with severe physical disability compared to 2.4% of those without severe physical disability. Martin and colleagues (2021) also showed heightened sex trafficking among children with a physical disability or long-term health problem in their analysis of a representative student survey in Minnesota, as 2.5% reported trading sex compared to the overall rate of 1.4%.

Franchino-Olsen and colleagues (2020) uncovered heightened sex trafficking among those with low cognitive ability, in which 9.7% of those with low cognitive ability experienced sex trafficking compared to 2.16% of those who did not have low cognitive ability. Chisolm-Straker et al. (2018) found that having an individualized education plan was significantly associated with a trafficking experience among homeless youth, which the authors delineated may be related to an intellectual disability as individualized education plans are more common among youth with intellectual disabilities or learning difficulties. Martin and colleagues (2021) found in their analysis that prevalence of sex trading among those with an individualized education plan was 2.8% compared to the overall rate of 1.4%, showing a heightened rate of sex trafficking among minors with an individualized education plan. The link between individualized education plans and trafficking is important, as it provides a basis for further research and prevention efforts, but remains unclear, as it does not explore the specific disabilities associated with individualized education plans (e.g., mild Attention

Deficit Hyperactivity Disorder compared to intellectual disability) or the nature of trafficking experiences in relationship to various forms of disabilities.

There appear to be no peer reviewed journal articles researching the relationship between labor trafficking and disability. Gray literature is limited to brief discussion of a limited number of cases and overview of basic federal labor trafficking related legislation (The Human Trafficking Pro Bono Legal Center and National Disability Rights Network, 2017). Federal and state prosecuted cases of human trafficking involving people with a disability remain under analyzed and under researched. When cases are used, they tend to be used as “flash” (i.e., to represent a specific scenario) in presentations, books, fact sheets, or websites (Minnesota Department of Administration Governor’s Council on Developmental Disabilities, 2021; Human Trafficking Legal Center, n.d.). A single case may also be the subject of a book; for example, Barry (2016) examined labor trafficking experienced by men with an intellectual disability on an Iowa turkey farm. The extant research examining human trafficking and disability is limited to this very small body of work. This work is important in order to illustrate the risk factors and experiences of trafficked people with a disability. However, no systematic research examining state and federal trafficking cases involving people with a disability has been conducted.

CHILD ABUSE, NEGLECT, AND RISK

Increased likelihood of sex trafficking among minors with disabilities can be situated within the broader body of research literature examining the relationship between disability, child abuse, and neglect. The extant research shows child abuse and neglect are risk factors for minor sex trafficking (Cole, 2016; Fedina et al., 2016; Gibbs et al., 2019). Notably, children with disabilities experience child abuse and neglect at higher rates than the general population (Hershkowitz et al., 2007; U.S. Department of Health & Human Services, 2017; Perrigo et al., 2018; Reid et al., 2018). Children with developmental delays experience reabuse at heightened rates compared to their peers without such delays (Perrigo et al., 2018). Children with disabilities are nearly four times more likely to be neglected and physically abused, more than three times more likely to experience sexual abuse, and more than twice as likely to be victimized by violent crimes compared to children without disabilities (National Human Trafficking and Disabilities Working Group, 2018). In addition, children with disabilities are more likely to experience more severe sexual abuse, and higher incidences of maltreatment resulting in physical and emotional harm (Reid, 2016; Reid et al., 2018; Franchino-Olsen et al., 2020). Ostensibly, as child abuse and neglect are risk factors for minor sex trafficking more broadly, and children with disabilities are more likely to experience child abuse and neglect, the risk of sex trafficking is heightened for children with disabilities.

INTELLECTUAL DISABILITY AND RISK

Children with an intellectual disability (i.e., I.Q. scores 75 and below) are known to be particularly vulnerable to sexual abuse (Wissink et al., 2015; Reid et al., 2018). A meta-analysis showed risk for sexual abuse is estimated to be four to six times higher for those with an intellectual disability compared to those without (Wissink et al. 2015). There is a number of disability-specific vulnerabilities to sex trafficking among those with an intellectual disability. First, children with intellectual disabilities are less likely to understand what constitutes sexual abuse and may not identify their experiences as such (Reid et al., 2018). Reid (2016) indicated some girls with intellectual disabilities are not able to understand the difference between a trafficker, a sex

buyer, and a boyfriend. They may also not be aware that what they are experiencing is a crime against them and may not understand their rights as trafficking victims (Polaris, 2018; Reid et al., 2018). Second, girls with an intellectual disability are less likely than girls without an intellectual disability to identify risky situations and may be more likely to be compliant to the requests of others, including unwanted sexual advances (Reid et al., 2018). People with an intellectual disability are more likely to be socialized to comply, in what some scholars refer to as “learned acquiescence,” which results in reduced understandings of body autonomy, boundaries, and the right to say no to sexual advances (National Human Trafficking and Disabilities Working Group, 2018). Reid et al. (2018) further report that girls with less severe intellectual disability may understand they are being exploited, but are not able to leave or understand that they have the right to decline sexual exploitation. Third, such dynamics are exacerbated by the false assumption that people with this disability type are not and will not be sexual, and as a result, people with an intellectual disability are less likely to access sex education (Reid et al., 2018; Tutar-Guven, 2016). Schmidt and colleagues (2015) indicated that people with intellectual and/or developmental disabilities experience decreased sexual health knowledge. This is a lost opportunity to discuss sexual boundaries, and what healthy sexual relationships look like.

INTERPERSONAL AND STRUCTURAL VULNERABILITIES

Vulnerabilities of people with a disability are situated within a larger context of oppression, including structural, interpersonal, and individual oppression. While experiences among those with a disability vary considerably depending on the nature of the disability and other contextual factors, research indicates structural oppression may include increased difficulty finding living wage employment, maintaining employment, and increased healthcare costs. The broader body of research literature finds lack of living wage employment, inaccessibility of healthcare, and poverty are associated with trafficking risk among the general population (Dank et al., 2015; Lutnick, 2016; Nichols, 2018). Because those with a disability are more likely to experience such dynamics, the risk of trafficking is heightened.

On an interpersonal level, those with a disability also experience oppression in the form of reduced social capital (Franchino-Olsen et al., 2020). Traffickers may specifically target them because of this; their family and friends may not believe them when they try to communicate about their trafficking experience (Polaris, 2018). For those whose disability impacts communication skills, this factor may also be a barrier to help seeking and is interrelated with lack of social supports (National Human Trafficking and Disabilities Working Group, 2018). In addition, being able to communicate about sex trafficking to access help may be challenging for those with severe intellectual disability (Reid et al., 2018). People with disabilities may also be targets for traffickers, because they will be less likely to be believed by law enforcement and social services if they seek help, reflecting and reproducing oppressions tied to limited social influence and social capital (Franchino-Olsen et al., 2020; National Human Trafficking and Disabilities Working Group, 2018; Reid et al., 2018). Schwarz, Kennedy, and Britton (2017) indicated that individuals with emotional, cognitive, or learning disabilities were targeted by traffickers because their disability was related to experiences with bullying, isolation, or being made by others to feel inferior or different. Traffickers take advantage of the vulnerabilities resulting from this interpersonal oppression, by offering friendship. Taken together, structural, and interpersonal oppression intertwine to increase vulnerability to both labor and sex trafficking.

RELATIONSHIP TO THE TRAFFICKER

Traffickers can be family members, guardians, caregivers, residential care givers, buyers, or those posing as friends or boyfriends/intimate partners (Human Trafficking Legal Center, n.d.). Depending on the nature of the disability, individuals may experience isolation, fewer social interactions, and may have reduced communication skills (National Human Trafficking and Disabilities Working Group, 2018). People with disabilities who are isolated may experience loneliness and seek out attention, friendship and affection—traffickers can take advantage of this, to fill a hole in their lives by pretending to be a friend or boyfriend/intimate partner (Polaris, 2018). Lack of social supports and connections problematizes help seeking, and also creates vulnerability to a trafficker looking for people who are lonely and lack affection and connection in their lives. This isolation can be exacerbated by the trafficker who then purposefully manipulates survivors to distrust their existing relationships with family, friends, social workers, and counselors (Polaris, 2018). Depending on the nature of the disability, a caregiver may be needed, and at times, caregivers become traffickers. Trafficked people with disabilities may be specifically sought out by traffickers to take their public benefits (e.g., Supplemental Security Income or Social Security Disability Insurance), and to victimize them in both sex and labor trafficking (Polaris 2018; National Human Trafficking and Disabilities Working Group, 2018).

In sum, empirical studies examining disability and human trafficking emerged relatively recently (Franchino-Olsen et al., 2020; Reid, 2016; Reid et al., 2018). The dearth of available research literature indicates that those with disabilities may be more likely to be “othered” and marginalized from current anti-trafficking efforts. The extant literature reflects a very small body of empirical research, which largely focuses on minor sex trafficking. Research examining labor trafficking and disability is even more scant than the research exploring sex trafficking. Gray literature largely includes legal definitions of trafficking, and an overview of a case or cases of human trafficking involving disability. While it is important to highlight the importance of risks and the trafficking of survivors with a disability, and use of cases in this way can be useful for this purpose, a systematic study of federal and state prosecuted cases is missing from the available research literature. The current study utilizes content analysis techniques to inductively analyze 18 federal and 17 state cases of human trafficking involving victims/survivors with a disability. The aim was exploratory in nature, in order to increase understandings of human trafficking involving survivors with disabilities.

METHODS

The current study employed a content analysis of civil and criminal case law (e.g., the outcome of legal cases) to examine human trafficking involving victims/survivors with various disabilities. The Human Trafficking Legal Center operates a database including both federal level and state level human trafficking cases. This database was utilized to initially uncover 18 federal cases involving people with disabilities within the previous 20 years (e.g., 2000-2020). However, two additional labor trafficking cases were identified prior to the passing of the U.S. TVPA (2000) and were included in the study because the cases had facts that equated to the current legal standard and consequently appeared in the Human Trafficking Legal Center database. Search terms included “labor trafficking,” “sex trafficking,” “human trafficking” and “disabled,” “disability,” and “persons with disabilities.” Seventeen state level cases were also uncovered from the Human Trafficking Legal Center, using the same search terms as the

federal level within the scope of the previous 20 years. The list of examined cases may be found in Table 1 (Federal cases) and Table 2 (State cases).

Table 1: Federal Criminal and Civil Trafficking Cases Involving Survivors with a Disability

Case Name	Docket No.	Jurisdiction	Year Filed	Type of Trafficking
United States v. Brooks (Al-Penyo)	2:20-cr-00193	W.D. Wash.	2020	Sex
United States v. Laguna-Guerrero	8:10-cr-00193	M.D. Fla.	2010	Sex
Richardson v. Richardson, No. 5:19-cv-05039 (D.S.D.)	5:19-cv-05039 (D.S.D.)	D.S.D.	2019	Sex
United States v. Kaufman	5:04-cr-40141	D. Kan.	2004	Sex and Labor
	Appeal: 546 F.3d 1242 (10th Cir. 2008)			
	17-cr-00907			
United States v. Edwards	15-cv-4612	D.S.C.	2017	Labor
Smith v. Edwards	781 F.3d 416, 420 (8th Cir. March 23, 2015)	D.S.C.	2015	Labor
United States v. Roy	2:18-cr-00160	E.D. Ark.	2013	Sex
United States v. Knope et al.	4:12-cr-00190	E.D. La.	2018	Labor
United States v. Mathews	4:08-mj-01176	E.D. Mo.	2012	Sex
United States v. Wallace	Appeal: 605 F.3d 477 (8th Cir. 2010)	E.D. Mo.	2008	Sex
	2:13-00025			
United States v. Weston	12-cv-00054	E.D. Pa.	2013	Sex and Labor
Frankenfield v. Strong	1:13-cr-00339	M.D. Tenn.	2012	Sex and Labor
United States v. Callahan	Appeal: Nos. 14-3771, 14-3772 (6th Cir. 2015)	N.D. Ohio	2013	Labor
	3:14-cr-00078			

United States v. White et al	1:18-cv-00089	N.D. Tex.	2014	Sex
Figgs v. GEO Group	3:11-cv-00041	S.D. Ind.	2018	Labor
EEOC v. Hill Country Farms, Inc.	Appeal: 13-2796 (8th Cir. 2014)	S.D. Iowa	2011	Labor
	487 U.S. 931			
United States v. Kozminski	No. 1:97-cr-00768		1988	Labor
United States v. Paoletti-Lemus, et.al.		E.D. New York	1998	Labor

Content analysis involves a systematic process of analyzing, coding, and classifying text or written communication to uncover themes (Hsieh & Shannon, 2005). The content analysis was inductive in nature and involved open coding and selective coding of the data (state and federal cases) by hand. The cases were first selectively coded as federal or state cases, and by type of trafficking (sex, labor, or both) (See Tables 1 and 2). Open coding further uncovered themes such as gender and citizenship of the traffickers and survivors, recruitment tactics used by traffickers, the relationship of the survivor to the trafficker, disabilities of survivors, and the status of the case.

Table 2: State Criminal and Civil Trafficking Cases Involving Survivors with a Disability

Case Name	State	Year	Type of Trafficking
Dominique Wilson	OH	2019	Sex
CA v. Barkley	CA	2019	Sex
NC v. Brian K. Bumpers II	NC	2019	Sex
Missouri v. Collins et al.	MO	2018	Sex
Florida v. Williams et al.	FL	2018	Sex
Connecticut v. Bemer at al	CT	2017	Sex
State of Minnesota v. Anne Marie Lindgren	MN	2017	Sex
State of Florida v. Clark et al.	FL	2017	Sex
Misty George, Michael Welch	MI	2017	Sex
State of North Carolina v. Harold Tanner	NC	2016	Sex

State of Wisconsin v. Jason Sheehan;	WI	2015	Labor
State of Florida v. Jeffrey Keowin	FL	2014	Sex
State of Minnesota v. Cheryl Ann Tchida	MN	2013	Sex
People v. Esteviz	ILL	2013	Labor
State of California v. Nicholas Geranios	CA	2010	Sex
Nebraska v. Swindle	NE	2017	Sex
Ohio v. Boynton et al.	OH	2017	Sex

The data were then further coded using taxonomic analysis of key themes, such as types of recruitment tactics, types of relationships to the trafficker, types of case status outcomes and types of disabilities of survivors (e.g., intellectual, developmental, neurological) (Spradley, 1980) (See Table 3). Intellectual disabilities were “characterized by significant limitations in both intellectual functioning and in adaptive behavior, which covers many everyday social and practical skills” (American Association of Intellectual and Developmental Disabilities, n.d.). Intellectual functioning relates to mental capacity; an I.Q. lower than 75 indicates an intellectual disability (American Association of Intellectual and Developmental Disabilities, n.d.). Developmental disabilities were defined as a “group of conditions due to an impairment in physical, learning, language, or behavior areas” (Center for Disease Control, n.d.). Neurological disabilities were defined as “disorders that affect the brain as well as the nerves found throughout the human body and the spinal cord” (Department of Public Health and Human Services, n.d.). The neurological disabilities were identified by effects of the underlying disability, such as deafness. Finally, the “other” category included cases in which the victim/survivor was documented as having a disability, but the underlying explanations were undisclosed or pertained to a previous injury (e.g., car accident). Quantification of the coded data resulted in the development of a table inclusive of descriptive statistics (see Table 3). Data analysis techniques beyond descriptive statistics were not utilized due to the limited number of cases.

Table 3. Characteristics of Human Trafficking Cases Involving Survivors with a Disability

Trafficking Type	(N=35)		
Labor ^a	(10)		
Sex ^b	(22)		
Both Sex and Labor	(3)		
	Labor Trafficking Only	Both Sex and Labor Trafficking	Sex Trafficking Only
Level of Prosecution			
Federal	(8)	(3)	(7)
State	(2)	(0)	(15)
Type of Disability			
Intellectual	(4)	(3)	(13)
Neurological	(2)	(0)	(0)
Developmental	(1)	(0)	(4)
Other	(3)	(0)	(5)
Relationship to Trafficker			
Intimate Partner	(0)	(0)	(3)
Manager/Other 3 rd Party	(7)	(0)	(14)
Family Member	(0)	(0)	(2)
Caregiver non-familial	(0)	(3)	(1)
Landlord	(1)	(0)	(0)
Prison Officials	(1)	(0)	(0)
Held captive	(1)	(0)	(0)
Buyer	(0)	(0)	(1)
Child pornography	(0)	(0)	(1)
Recruitment Tactics			
Employment	(4)	(0)	(0)
Social Media	(0)	(0)	(2)
Friendship	(1)	(0)	(1)

Kidnapping	(0)	(0)	(1)
Drugs	(0)	(0)	(1)
Transportation money	(0)	(0)	(1)
Use of relationship	(1)	(3)	(7)
Unknown	(4)	(0)	(9)
Case Status			
Guilty Prosecution	(3)	(2)	(8)
Pleaded Guilty	(3)	(0)	(4)
Indictment	(0)	(0)	(8)
Civil Settlement	(3)	(1)	(1)
Unknown	(1)	(0)	(1)
Gender of Survivors			
Women/Girls	(4)	(1)	(20)
Men/Boys ^c	(6+)	(1)	(15+)
Unknown ^d	(2+)	(22+)	(11+)
Gender of Traffickers			
Women	(5)	(2)	(8)
Men	(6)	(2)	(23)
Unknown	(1)	(0)	(0)
Citizenship of Survivors			
Citizen/Lawful Permanent Resident	(12+)	(4)	(35+)
Foreign National ^e	(50)	(0)	(0)
Unknown ^f	(0)	(0)	(1)
Citizenship of Traffickers			
Citizen/LPR	(12)	(4)	(31)
Foreign National	(0)	(0)	(1)
Unknown	(0)	(0)	(0)

a. Labor trafficking refers to "the recruitment, transport, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion."

- b. Sex trafficking refers to a commercial sex act “induced by force, fraud, or coercion, or in which the person ... has not attained 18 years of age.”
- c. The + indicated in the gender columns identifying men/boy survivors stemmed from two cases in which the documents ambiguously stated “multiple male victims.”
- d. The + indicated in the gender columns indicating unknown gender identity of survivors stems from one case that indicated 11+ victims (OH v. Boynton et.al. (2017) and another that indicated 20+ victims (United States v. Kaufman 2004). In both of those cases, the documents stated the number of victims without providing demographic information.
- e. The 50 foreign national survivors came from one case (United States v. Paoletti-Lemus). The documents state that the mother daughter team trafficked Mexican citizens who were deaf, and they were ordered to pay restitution to 50 of the exploited workers.
- f. In this case, the survivor was described as smuggled into the U.S.

FINDINGS

The majority of the cases that were identified involved sex trafficking of persons with disabilities (n=22), while labor trafficking (n=10) and both sex and labor trafficking cases combined (n=3) composed a smaller number of cases (see Table 3). Further, when comparing the state and federal level cases, it was found that cases of sex trafficking were more likely to be identified at the state level than at the federal level (n=7, federal level; n=15, state level). Comparatively, labor trafficking cases were unlikely to be identified at the state level, with only two cases identified at the state level, while eight were identified at the federal level. The three cases that were identified as both labor and sex trafficking were prosecuted at the federal level.

Survivor and trafficker demographics were also analyzed. Across all types of trafficking, 25 survivors were described as women/girls, and 22+ survivors were described as men/boys. The “plus” represents survivors identified in those cases in which the brief only stated “multiple male victims.” Traffickers were more likely to be identified as men (n=31) with the majority involved in sex trafficking (n=23). Traffickers were identified as women in 15 of the cases, with just over half involved in sex trafficking. No survivors or traffickers were described as transgender or non-binary, either indicating all survivors and traffickers were cisgender, or gender was not explored beyond binary labels, which is typical in the criminal justice system. Citizenship was also analyzed. Only two cases mentioned citizenship, which led to the conclusion that the majority of the survivors/victims were documented citizens. In only one case was the trafficker identified as a smuggled individual, and in the other case described 50 Mexican citizen survivors who were paid restitution.

Key findings in this study identified the types of disabilities associated with trafficked individuals. These results were further coded and categorized into four areas of disability: intellectual, developmental, neurological, and “other.” Across all types of trafficking, the main disability identified was an intellectual disability (n=20). Cases identified intellectual disability in relationship to the low cognitive ability and I.Q. of the victim/survivor. In many cases, intellectual disabilities were identified by the victim/survivor being labeled offensively, using the problematic and stigmatizing term “mentally retarded.” Five cases were identified in which the victim/survivor exhibited signs of a developmental disability. These cases were identified as such because the actual documentation stated the victim/survivor as developmentally disabled. Only two cases identified individuals with neurological disabilities; one of which was cerebral palsy and the other deafness. Eight cases were identified as “other;” as previously stated, these cases highlighted the disability status of the victim/survivor, but the cause of the disability was either undisclosed or was not congenital.

The findings indicated overwhelmingly that a manager/other third-party trafficker (n=21) was predominant, (n=7 labor trafficking; n=14 sex trafficking) rather than a specific personal relationship to the trafficker (e.g., romantic partner/ family member). Victims/survivors of sex trafficking by a manager/other third-party were most often trafficked by a non-intimate partner described as a pimp. Four cases had a victim/trafficker relationship in which the trafficker was a recognized caregiver (i.e., appointed conservator or residential housing). Other relationships experienced by sex trafficking survivors included an intimate partner (n=3), family member (n=2), buyer of sex (n=1), and a child pornography ring in which multiple perpetrators were implicated (n=1). Experiences specific to labor trafficking survivors included trafficking by a landlord (n=1), inmates being trafficked by a prison official (n=1), and being held captive (n=1) to perform labor. Victims/survivors that experienced both types of trafficking were all trafficked by a non-familial caregiver (n=3).

Strategies of recruitment used by the traffickers depended on their relationship status to the victims. Traffickers used their status of familial and non-familial caregiver, manager, and intimate partner status to recruit the victim/survivors in the majority of the cases (n=11). Friendship (n=2) was used as a recruitment strategy for sex and labor trafficking. Recruitment strategies exclusively used for sex trafficking also included social media (n=2), kidnapping (n=1), reimbursement for transportation (n=1), and the offering of drugs (n=1). A recruitment strategy for labor trafficking only (n=4) included offering employment.

The cases each varied in terms of prosecutorial status. The majority of the cases were successfully prosecuted with the defendant being found guilty (n=13). In seven of the cases, the defendant pleaded guilty. In eight cases, the suspect had been indicted, but there had not yet been a trial or plea. Five of the cases involved successful civil settlements, while the remaining two cases had unknown statuses. Civil settlements were more likely to occur in labor trafficking cases, whereas sex trafficking cases and cases involving both labor and sex trafficking were more likely to be successfully prosecuted.

DISCUSSION

In terms of the type of trafficking experienced, the patterns identified in the current study are consistent with other state-level prosecuted cases of human trafficking, in that sex trafficking cases are more likely to be identified and prosecuted compared to labor trafficking (See Farrell et.al, 2012). Moreover, sex trafficking cases were more likely to be identified overall, which is also consistent with prior research examining trafficking identification patterns more broadly (Polaris, 2018; Nichols, Preble, & Cox, 2022). Researchers note that the difficulty with and lack of resources allocated to identification of labor trafficking compared to sex trafficking may account for differences in the number of sex and labor trafficking cases that are identified (Nichols, Preble, & Cox, 2022; Heil & Nichols, 2019; Zhang, 2012; Zhang et al., 2018). Furthermore, understanding the fine line between wage and hour violations and labor trafficking also complicates labor trafficking identification and prosecution (Nichols & Heil, 2017; Farrell et al., 2016). Similar patterns of identification to that of national and state level data are revealed in the current study, within the context of labor and sex trafficking involving those with a disability. Implications potentially include improving identification of labor trafficking and continued efforts towards inclusivity of disability in both sex and labor trafficking focused professionalized trainings and community education and awareness initiatives. Professionalized trainings inclusive of risk factors and scenarios experienced by trafficking survivors with disabilities

within law enforcement, social services, healthcare, and specifically among organizations serving people with a disability may work to improve identification, access to related resources, and potential prosecution of traffickers.

Importantly, the vast majority of cases involved situations in which the disability was an intellectual disability—21 of the 35 identified cases- and of these, 14 involved sex trafficking. This indicates that among those with a disability, those with an intellectual disability may be particularly at risk of human trafficking, especially sex trafficking. This is consistent with the small body of research in this area, which indicates heightened risk related to not understanding sexual boundaries, the nature of sexual exploitation, or the right to decline sex (Reid, 2016; Reid et al., 2018; National Human Trafficking and Disabilities Working Group, 2018). Implications include sex education provided to those with an intellectual disability, including curriculum on healthy relationships, consent, and sexual boundaries (Schmidt et al., 2015). This may be key to prevention of sex trafficking of individuals with an intellectual disability (Reid et al., 2018). This finding further supports the need for inclusivity of the experiences of survivors with a disability in professionalized trainings to improve identification of trafficking, particularly among service providers who work with those with an intellectual disability. The findings of the current study also support the recommendations of Chisolm-Straker and colleagues (2018), who indicated that professionals working with youth with individual education plans were in a prime position to engage in trafficking focused identification and prevention efforts. Similarly, the current study indicates those working with people with intellectual disabilities, and disabilities more broadly, are well positioned to engage in identification and prevention efforts, implicating professionalized trainings of service providers in these areas.

The study findings indicated that survivors' relationship to the trafficker was comparable to the general victim/trafficker relationships, such as trafficking by a family member, intimate partner, or other third party/manager, with the exception of the status of non-familial caregiver. The dynamic of a non-intimate/ non-familial caregiver as a trafficker is uniquely experienced by people with a disability compared to the broader population of human trafficking survivors. Notably, research indicates that the most common forms of sex trafficking typically involve intimate partners (Polaris, 2019); however, manager/other third-party trafficking was by far the most common relationship to the trafficker identified among those with a disability, among sex and labor trafficking survivors alike. This somewhat counters narratives of exploitive caregivers and family members, instead indicating that third parties, possibly initially strangers, are seeking out people with a disability to traffic. Alternatively, these cases may be more likely to be identified and prosecuted. Recruitment strategies overlapped with the relationship to the trafficker in most cases in which the recruitment strategy was known. Social media, friendship, offering drugs or transportation money and kidnapping appeared infrequently in the case data, whereas use of relationships (predominately by third-party managers, and to a lesser degree intimate partners, family members, and caregivers) were more frequently involved in recruiting individuals into a sex, labor, or sex/labor trafficking situation. The implications of this finding suggest that education for individuals with a disability who are at heightened risk be informed of ways other people may take advantage of their vulnerability to profit from their labor and sexuality, and provision of information about related resources. This finding supports the work of Polaris (2018), which recommends providing such information in waiting rooms, such as healthcare offices and clinics, behavioral and mental health centers, residential care facilities, and vocational training centers accessed by people with a disability. Professionals working within these areas may also

benefit from trainings about human trafficking inclusive of survivors with a disability, which may facilitate conversations with at-risk clients. Training materials are available from the National Disability Rights Network, the Human Trafficking Legal Center, and National Human Trafficking Working Group. Schwarz, Kennedy, and Britton (2017) indicated that there are missed opportunities for identification by case managers, or social workers who do not have the training to identify trafficking situations, suggesting the need for training and resources in schools and social services. In addition, because of the known association with child abuse and neglect with trafficking, combined with the association of heightened child abuse and neglect experienced by children with disabilities, education and training specifically in the child welfare system inclusive of trafficking of children with disabilities is recommended.

It appears that the vast majority of cases involving a person with a disability are successfully prosecuted, plea-bargained, or civilly settled. Thus, it appears that prosecutors are adequately prepared to prosecute these cases. Furthermore, Chisolm-Straker and associates (2018) suggested disability rights attorneys can file for civil damages, and survivors are entitled to restitution under federal law as well. The current study indicates that civil cases are typically successful, as are federally prosecuted cases, supporting the recommendation of Chisolm-Straker and colleagues (2018). However, the sample size of identified cases was relatively small compared to other types of trafficking cases prosecuted. Although the cases identified in this study revealed a pattern of successful prosecution, plea-bargain, or civil suit, there still exists a gap in unidentified trafficking cases of persons with disabilities that were not in the existing case law. In other words, there is a gap in the data of those cases that are charged as trafficking compared to those that may be charged with another crime, not identified as trafficking cases but rather as abuse cases, or that are not identified.

The findings related to survivor and trafficker demographics indicated both types of trafficking are experienced by men/boys and women/girls. Data did not include identification of transgender or non-binary people. It is unclear whether there were no survivors who were transgender or non-binary, or if this finding was a reflection of the way the courts identified gender. More research is needed to better understand the experiences of transgender, non-binary, or queer individuals with a disability who are trafficked. The traffickers were overwhelmingly men, and involved in sex trafficking. This is likely a reflection of gender dynamics in society, and gendered aspects of power and control. Furthermore, the vast majority of survivors, excepting one case involving 50 foreign national survivors of labor trafficking, were U.S. citizens, as were the traffickers. This is also consistent with national and state level data (Montivans & Snyder, 2018; Polaris, 2019; Turner et al., 2014). Implications include outreach and prevention efforts focused on domestic sex trafficking survivors, while simultaneously working to expand identification efforts focused on labor trafficking more broadly among people of all genders and citizenship statuses. While much attention is given to border control to address trafficking, such efforts appear unwarranted, as national data, as well as this disability-specific data, indicates trafficking by U.S. citizens of predominantly U.S. Citizens (Montivans & Snyder, 2018; Polaris, 2019; Nichols, Preble, & Cox, 2022; Turner et al., 2014). At the same time, those working in social, legal, and healthcare services should receive training about trafficking inclusive of people with a disability and intersections with citizenship status (Egyes, 2017).

LIMITATIONS

The current study is limited as a content analysis of federal and state cases of human trafficking involving people with a disability. Prosecuted cases of human trafficking are limited in scope, as they only include human trafficking cases that were identified as such, and do not reflect those cases that are not identified and or do not meet the evidentiary burden for prosecution (See Farrell et al., 2016). There may be a difference between the experiences of those who were identified and recognized as human trafficking survivors compared to those who were not, and those cases that moved forward for prosecution compared to those which did not. Accordingly, as a small data set only reflective of cases that meet criteria for federal or state prosecution cannot be used to determine trends or trafficking experienced by people with disabilities more broadly. Further research is needed to better understand experiences with human trafficking among those with a disability from survivors' perspectives, and drawing from experiences that do not meet criteria for state or federal prosecution or instances of trafficking that are otherwise not prosecuted. Furthermore, some demographic details of survivors were not available, thus limiting our understandings of inequalities intersecting with disability that may impact survivors' experiences. Future research should explore the ways various oppressions intersect to impact experiences of survivors of human trafficking with disabilities. Experiences with oppression are heightened when combined with additional inequities such as poverty and structural racism (Franchino-Olsen et al., 2020; Reid, 2016; Reid et al., 2018; National Human Trafficking and Disabilities Working Group, 2018).

These structural and interpersonal oppressions broadly experienced by people with a disability increase vulnerability to human trafficking, and must be better understood through further research in this area. In addition, the disabilities reflected in the prosecuted cases are largely limited to more impactful instances of intellectual, developmental, and neurological disabilities. This is likely because a disability will not likely be reflected in the facts of a case if it would not lead to a sentencing enhancement or aggravated factor. Exploring the ways additional types and manifestations of disabilities relate to trafficking experiences is necessary to expand the knowledge base in this area.

CONCLUSION

The current study sought to further our understandings of sex and labor trafficking involving people with a disability through a systematic content analysis of state and federal human trafficking cases. Key patterns and themes revealed dynamics surrounding trafficking type, case outcomes, state compared to federal cases, demographics of traffickers and survivors, the relationship to the trafficker and recruitment patterns, as well as the types of disabilities of trafficking survivors. Primary implications include expanded education and training for professionals in social, legal and healthcare that is inclusive of disability, as well as prevention education particularly for those with an intellectual disability focused on sexual boundaries and healthy relationships. The authors aimed to contribute to a very small body of literature exploring this intersection of disability and trafficking and recommend further research and action in this area to better prevent and serve people with a disability experiencing trafficking.

Although this study was not designed to provide information about the perpetrators, many of its recommendations, if implemented, will hold these individuals taking advantage of people with a disability accountable, by providing the knowledge

needed to either resist or report trafficking, thus enhancing our ability to identify and prosecute cases involving disability.

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