



Federal Human Trafficking Civil Litigation: 2020 Data Update



**Federal
Human Trafficking
Civil Litigation:
2020 Data Update**

Acknowledgements

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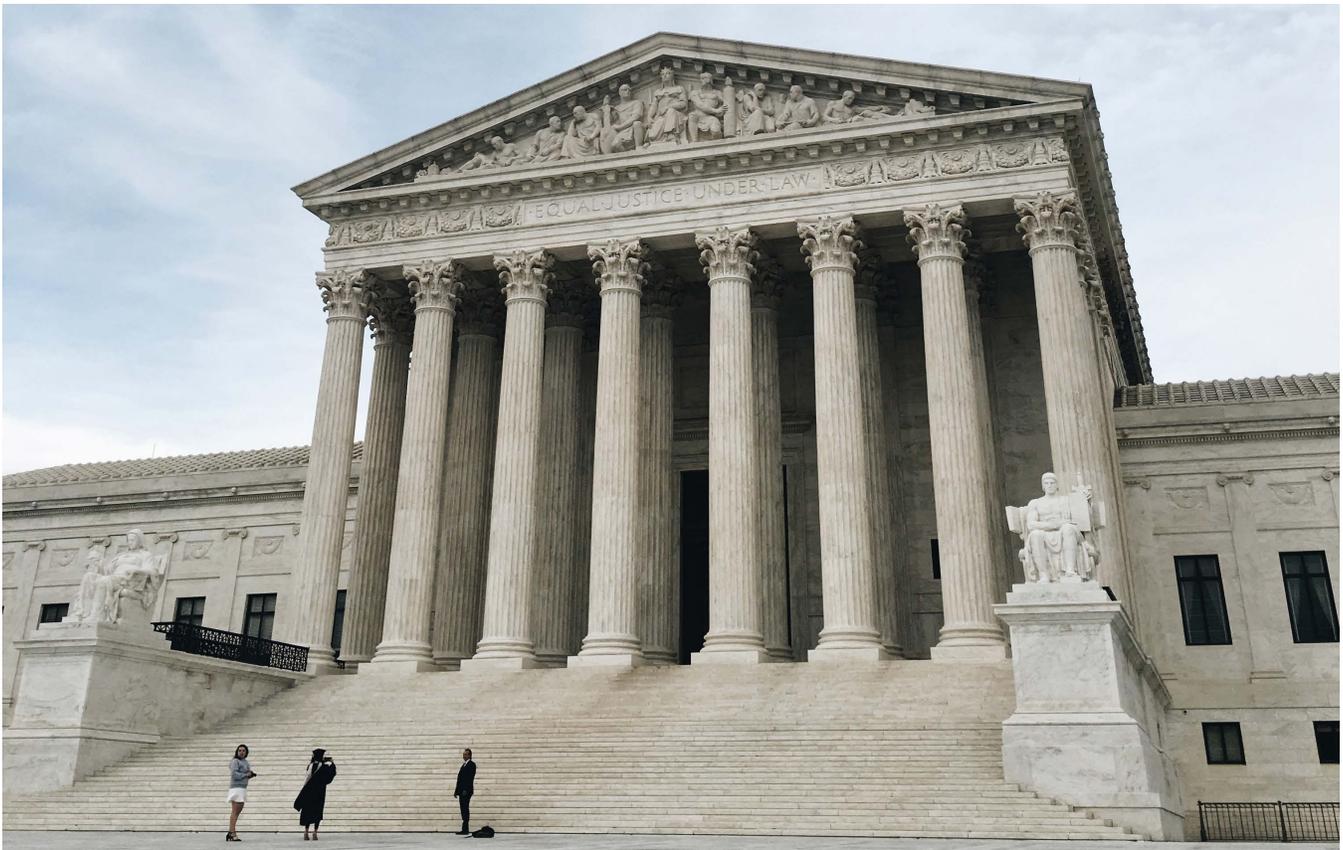
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Federal Human Trafficking Civil Litigation: 2020 Data Update¹

I. Introduction

In October 2003, Congress passed a law allowing trafficking victims to recover civil damages from their traffickers in federal courts, 18 U.S.C. §1595. That law, now known as the Trafficking Victims Protection Reauthorization Act (TVPRA), has become a powerful tool to hold traffickers accountable in federal court. In the 17 years since the law's passage, plaintiffs have brought 458 cases in federal court under this cause of action. In the same period, courts have awarded trafficking survivors at least \$255,298,993.50 in civil damages, following settlements or findings of liability by courts or juries.

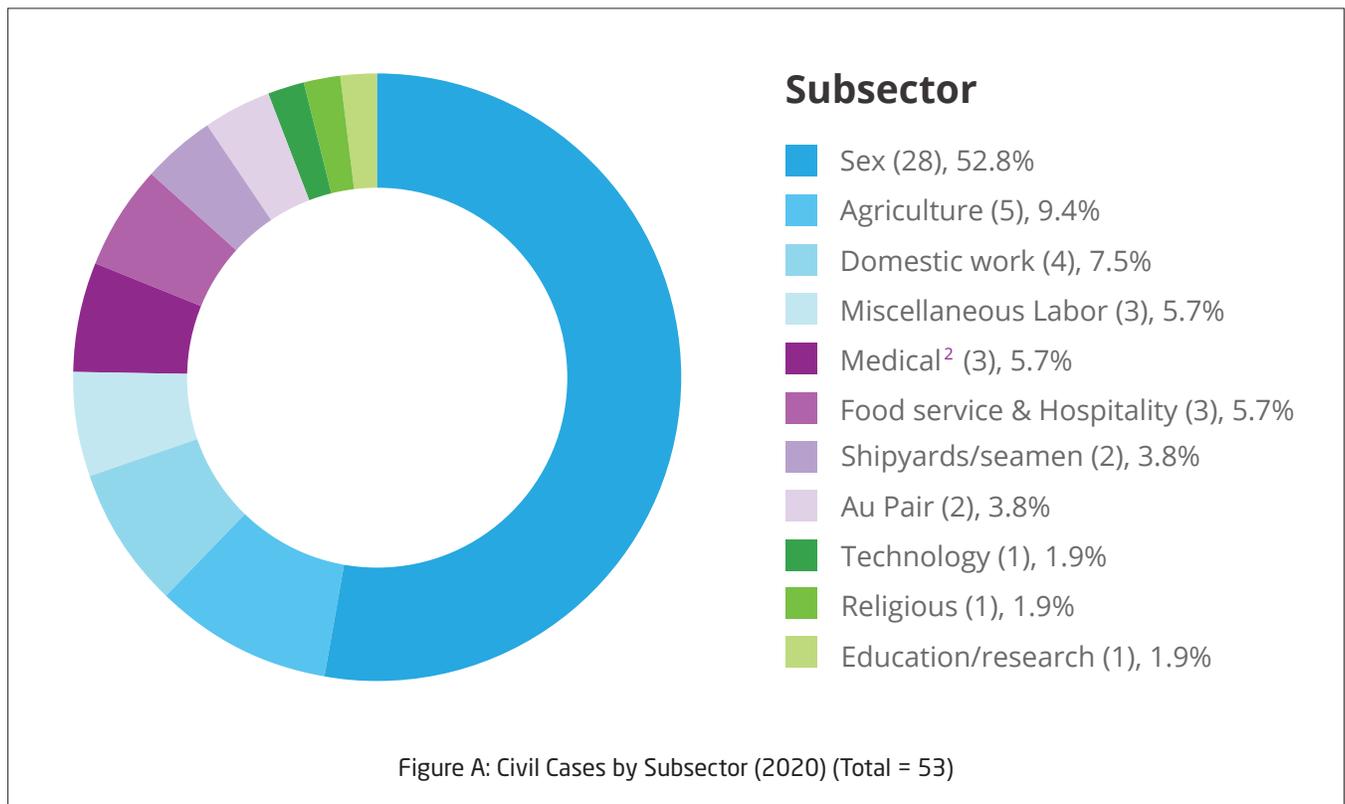


¹ This publication updates the data contained in a 2018 report published by the Human Trafficking Legal Center. See Alexandra F. Levy, *Federal Human Trafficking Civil Litigation: 15 Years of the Private Right of Action*, The Human Trafficking Legal Center (December 2018) [Hereinafter *2018 Civil Litigation Report*]. The charts and figures in this report are updated versions of the charts and figures in the original report. The Human Trafficking Legal Center thanks Alexandra Levy Yelderman for her contributions to this report.

II. Year at a Glance: 2020 Civil Cases by Subsector

In 2020 alone, plaintiffs brought 53 federal cases alleging violations of the TVPRA. Of these cases, 27 alleged only sex trafficking, 22 alleged only labor trafficking, and four included allegations of both sex and labor trafficking.

The 53 federal trafficking cases filed in 2020 reflected a drop from the historical high of 88 cases filed in 2019. The drop in cases may in part be attributable to the onset of the pandemic in March 2020. Nationwide, the total number of civil trafficking cases filed in federal courts between March 2020 and December 2020 (28) was 58% lower than the number in the same period a year earlier (66). But, over time, the trajectory of federal trafficking case filings has continued to climb.

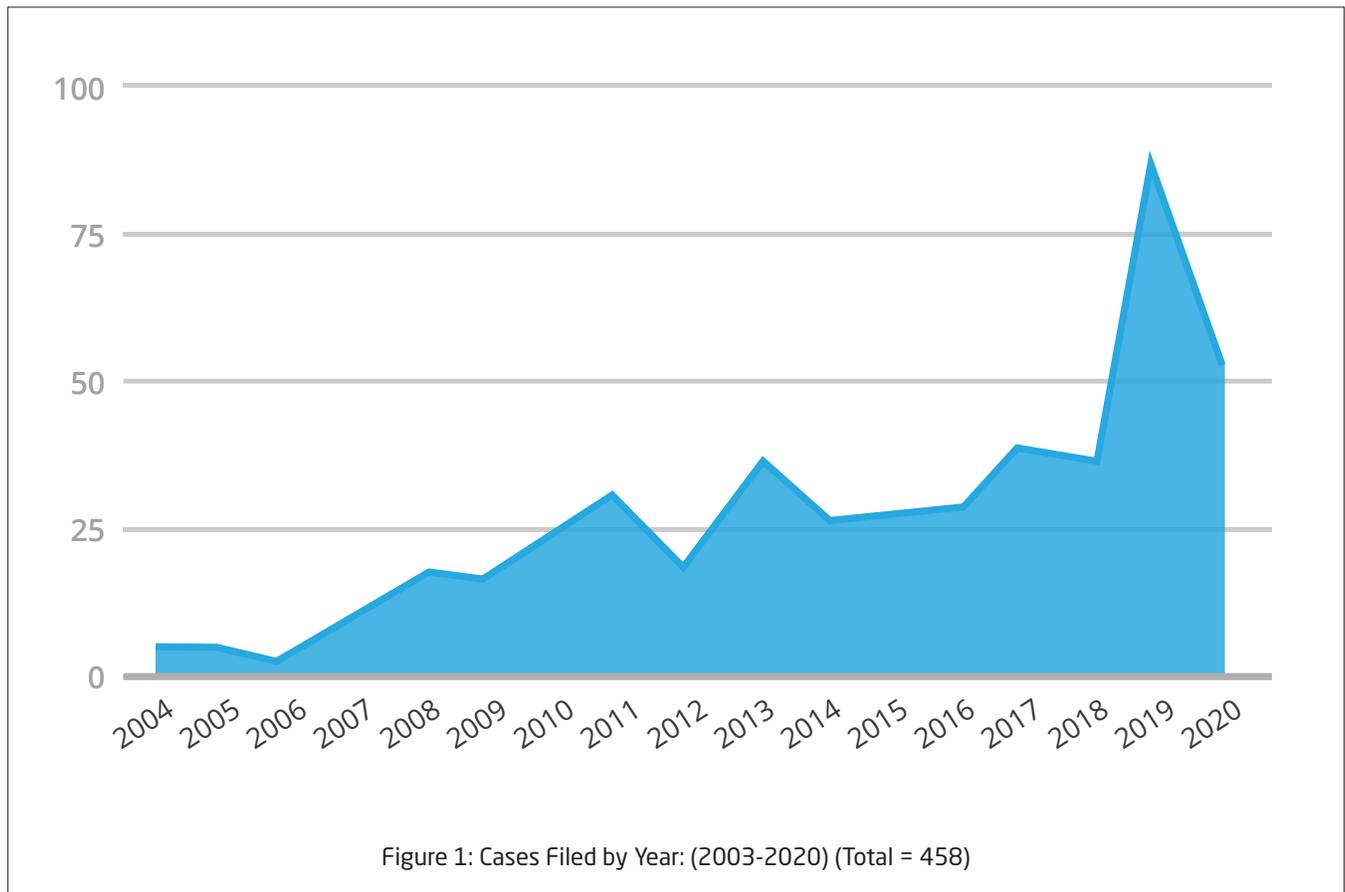


² The category "Medical" as a subsector refers to trafficking of nurses, doctors, physical therapists, and medical product manufacturers. This category also covers trafficking within psychiatric in-patient treatment programs. It does not include cases of organ trafficking, which are not covered by the TVPRA.

III. Trafficking Civil Litigation: Quantitative Trends

A. Cases Filed by Year³

As of December 31, 2020, plaintiffs had brought a total of 458 federal cases under the federal private right of action.⁴ The number of federal civil trafficking cases rose steadily between 2003 and 2020, with more than fourteen times as many cases filed in 2019 (88) as in 2004 (6).⁵



³ This graph corresponds with Figure 1 in the *2018 Civil Litigation Report*. See Levy, *supra* note 1, at 10.

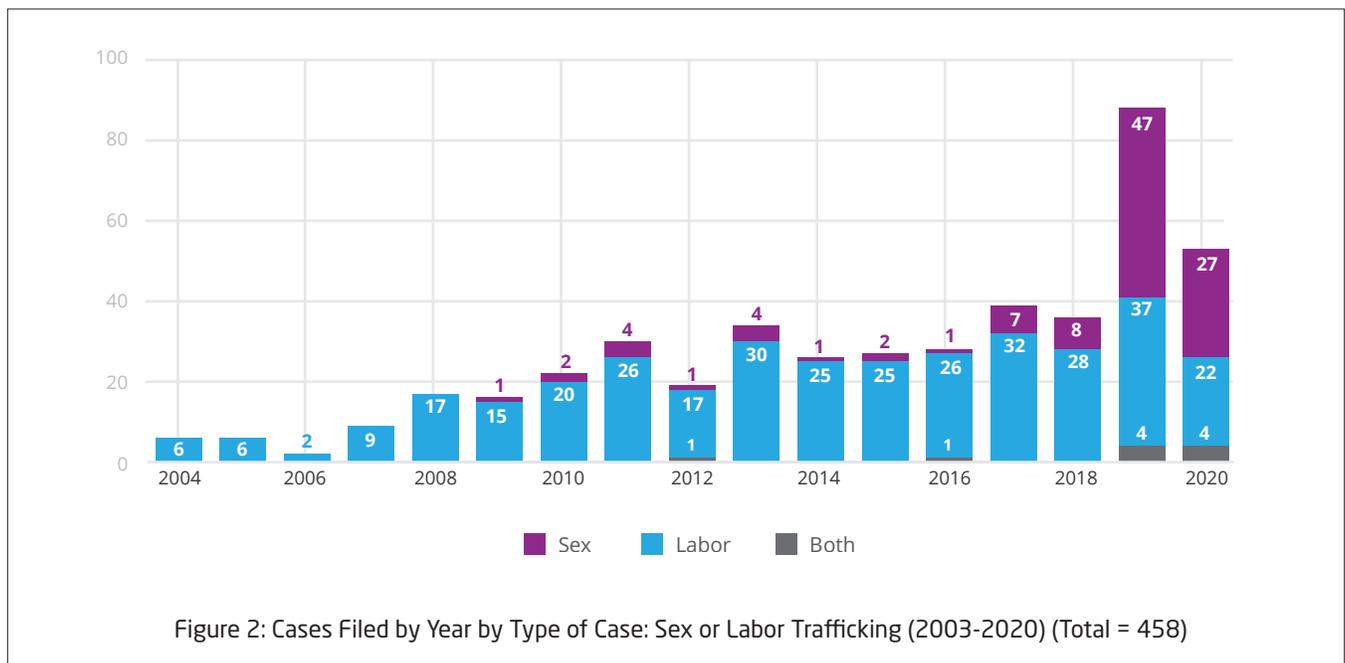
⁴ This number does not include lawsuits that courts dismissed as frivolous, or cases consolidated soon after filing. Moreover, in at least one situation, a single plaintiff filed over 15 suits, making almost identical claims in the same court against the similar defendants. While these cases were not formally consolidated, for the purposes of this report, those cases were counted as a single case.

⁵ For a full list of the number of federal civil cases filed under 18 U.S.C. §1595 by state, see Appendix A, *infra* at 20.

B. Civil Trafficking Cases Filed by Type⁶

From 2003 until 2009, all the civil trafficking cases filed under 18 U.S.C. § 1595 included only allegations of forced labor. In 2009, a trafficking survivor brought the first federal civil case alleging sex trafficking.⁷ Since then, federal dockets have seen a surge of civil sex trafficking cases, with more sex trafficking cases filed than labor trafficking cases in both 2019 and 2020.⁸ This is unsurprising: the authors of the original 2018 report predicted this trend, writing then, “it is likely that the number of sex trafficking civil cases will surge, as attorneys become more sophisticated in attacking third-party beneficiaries.”⁹ The vast majority of the sex trafficking cases have targeted hotels and the hospitality industry for financially benefiting from the plaintiff’s sex trafficking victimization.¹⁰

Another growing trend is the use of extraterritorial jurisdiction. A 2008 amendment to the TVPRA, 18 U.S.C. § 1596, provides explicit extraterritorial jurisdiction to bring criminal and civil trafficking cases in U.S. federal courts. What this means is that trafficking survivors can sue for offenses committed abroad. Thus far, 13 cases have invoked extraterritorial jurisdiction.¹¹ The provision has the potential to hold corporations accountable for forced labor in global supply chains.¹²



⁶ This graph corresponds with Figure 2 in the *2018 Civil Litigation Report*. See Levy, *supra* note 1, at 11.

⁷ See *Ditullio v. Boehm*, 3:09-cv-00113 (D.Ak.). Boehm, the defendant, pled guilty in the federal criminal case brought against him, *United States v. Boehm*, 3:04-cr-00003 (D.Ak.). The civil case settled for \$400,000.

⁸ In 2019, trafficking survivors filed 37 labor trafficking cases, compared with 47 sex trafficking cases. Plaintiffs filed four cases that included allegations of both sex and labor trafficking in 2019. In 2020, trafficking survivors filed 22 labor trafficking cases, compared with 27 sex trafficking cases. As in 2019, plaintiffs in 2020 filed four cases that included allegations of both sex and labor trafficking.

⁹ See Levy, *supra* note 1, at 30.

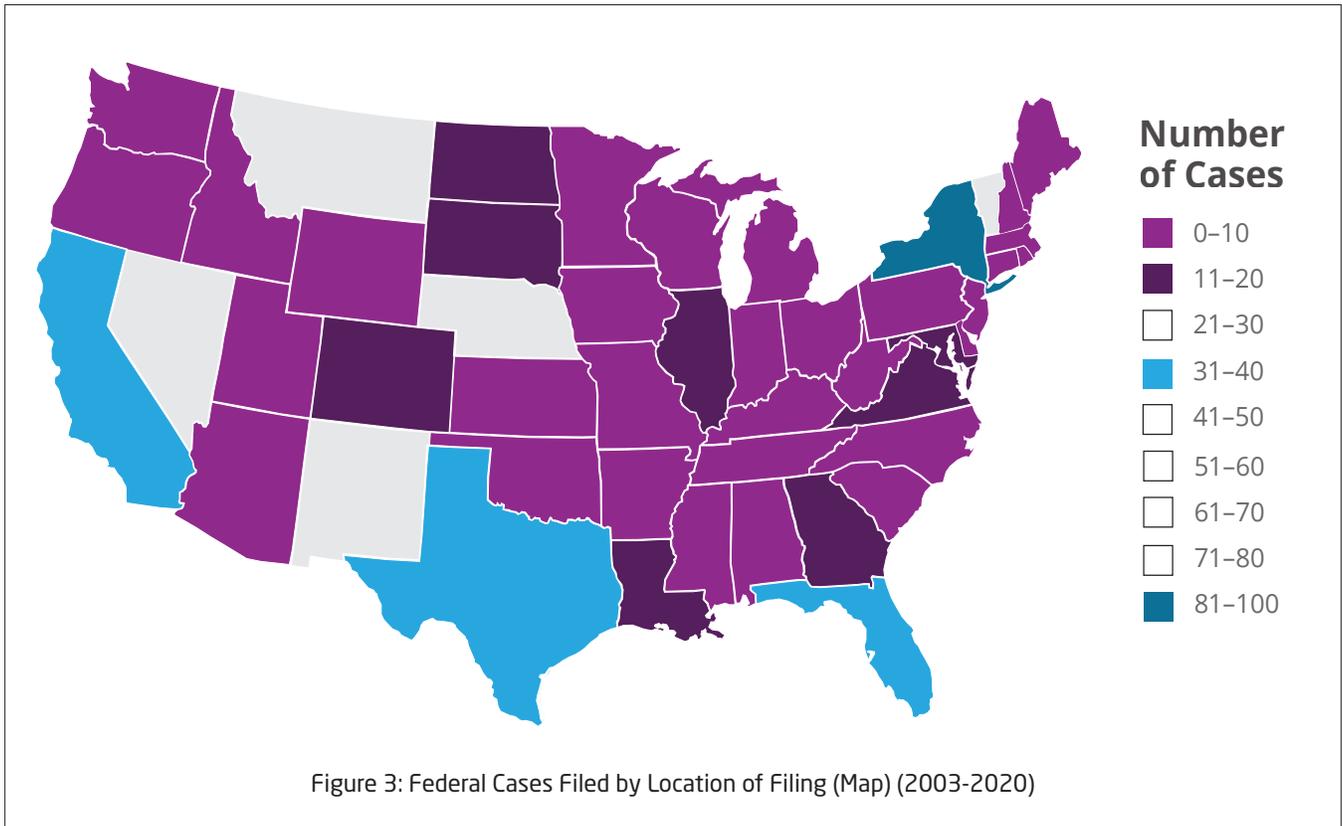
¹⁰ From 2003 to 2020, plaintiffs alleging sex trafficking filed 105 civil cases under 18 U.S.C. §1595. During that period, 49 of those civil cases were filed against hotels on a third-party beneficiary theory. In 2020, plaintiffs filed 27 civil sex trafficking cases; 11 of those cases were filed against hotels on a third-party beneficiary theory. In one instance, a plaintiff filed multiple, nearly identical cases against hotels in 2020. For purposes of this report, that case is counted only once. See *supra* note 4.

¹¹ Ten of these extraterritorial cases alleged forced labor, and three alleged sex trafficking.

¹² See Brief of Members of Congress Senator Blumenthal, Representative Smith, et al., as Amici Curiae Supporting Respondents at 24–25, *Nestlé USA, Inc. v. Doe I*, No. 19-419 (Oct. 21, 2020).

C. Civil Trafficking Cases Filed by Location¹³

As of December 31, 2020, plaintiffs had filed federal civil human trafficking cases in 48 states and territories, with the highest numbers of cases brought in New York (96), California (36), and Texas (36).¹⁴ No civil trafficking cases had been filed in Montana, New Mexico, Nebraska, Nevada, Puerto Rico, Vermont, or the Virgin Islands.¹⁵



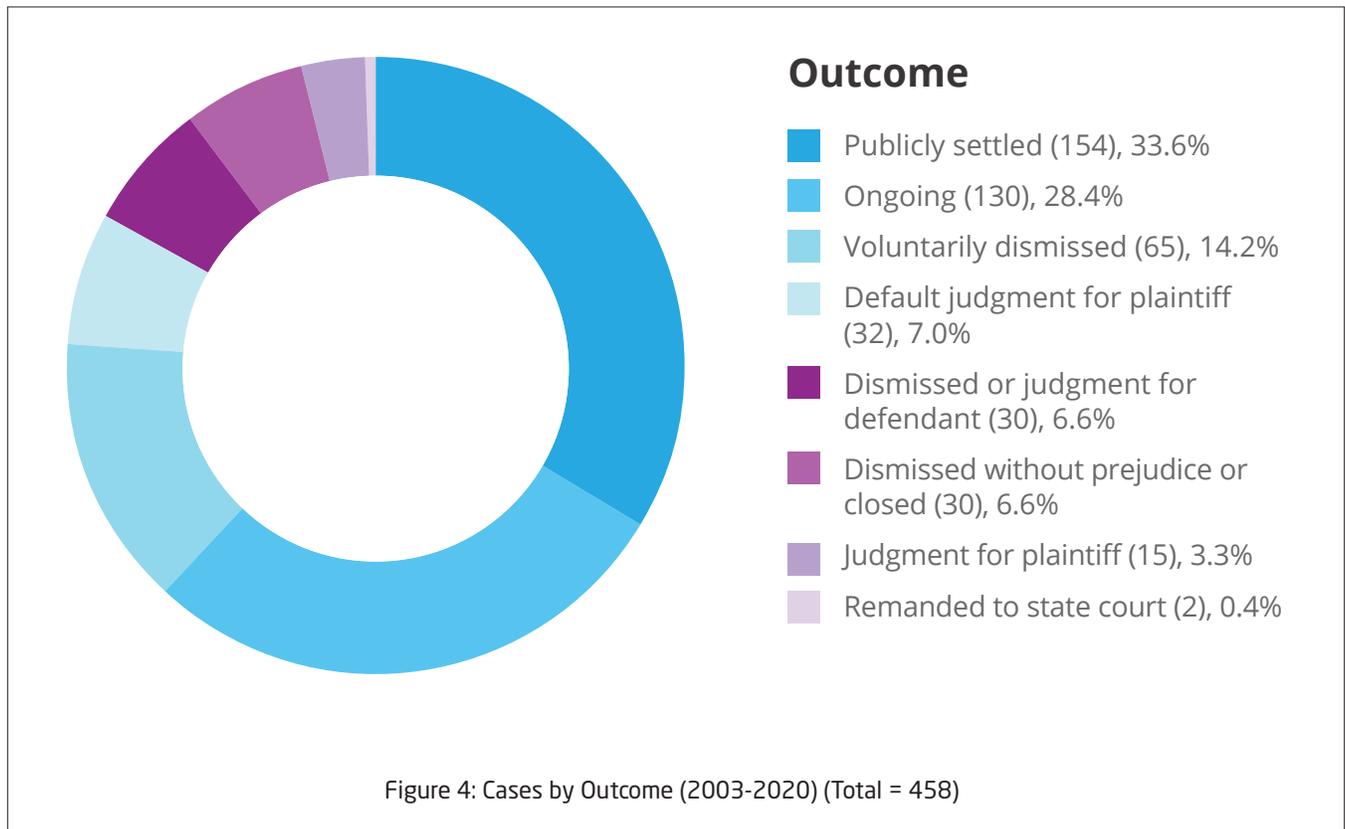
¹³ This map corresponds with Figure 3 of the 2018 *Civil Litigation Report*. See Levy, *supra* note 1, at 11.

¹⁴ The data discussed in this report reflect only case filings made in federal courts.

¹⁵ Since our 2018 *Civil Litigation Report*, Delaware, Iowa, Maine, New Hampshire, and West Virginia have seen their first civil cases filed in federal court. In 2021, trafficking survivors filed cases in the U.S. Virgin Islands. See *Cotto et al v. TJ Sutton Enterprises, LLC et al*, 3:21-cv-00016 (D.V.I.); *Emperor v. Alpine Group USVI, LLC et al*, 3:21-cv-00042 (D.V.I.).

D. Outcomes in Federal Civil Trafficking Cases¹⁶

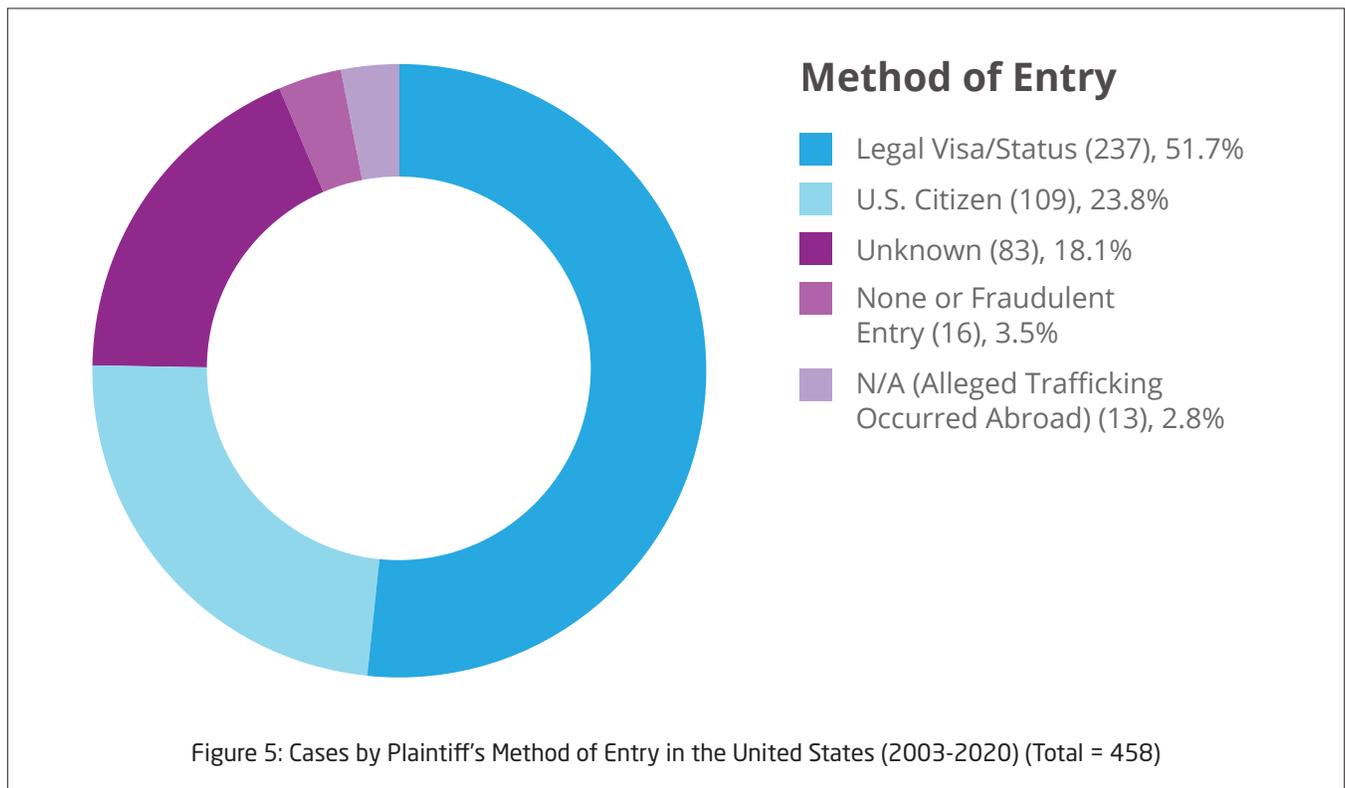
Just over a quarter of cases filed as of December 31, 2020 (130) were ongoing as of May 1, 2021. Nearly 44% of all cases under the TVPRA's private right of action, filed on or before December 31, 2020, resulted in judgments for the plaintiff(s) (47) or public settlements (154); 14% were voluntarily dismissed (65); and roughly 6% of cases filed were closed or dismissed without prejudice (30). A similar number of cases (30) ended with involuntary dismissals or judgments for defendants.



¹⁶ This chart corresponds with Figure 4 of the *2018 Civil Litigation Report*. See Levy, *supra* note 1, at 12. This data set includes all cases filed on or before December 31, 2020, but includes status updates current as of May 1, 2021.

E. Immigration and Visa Status of Trafficking Plaintiffs¹⁷

About 55% (253) of civil trafficking cases filed between 2003 and 2020 were brought by foreign-born plaintiffs, many of whom entered the United States with legal visas or legal status.¹⁸ A little over a quarter of cases (122) involved either U.S.-citizen plaintiffs (109), or alleged offenses that occurred abroad (mooting the need for a visa) (13).¹⁹ Roughly 3% (16) of cases involved plaintiffs who came to the United States without valid documentation. In around 18% (83) of cases, it was not possible to determine visa status based on available filings.



¹⁷ This chart corresponds with Figure 5 of the 2018 *Civil Litigation Report*. See *id.* at 12.

¹⁸ This number includes those who entered with legal visas (237), those who entered as a refugee (1), those who — at the time of their trafficking — held temporary protected status (1) or were a longtime permanent resident (2).

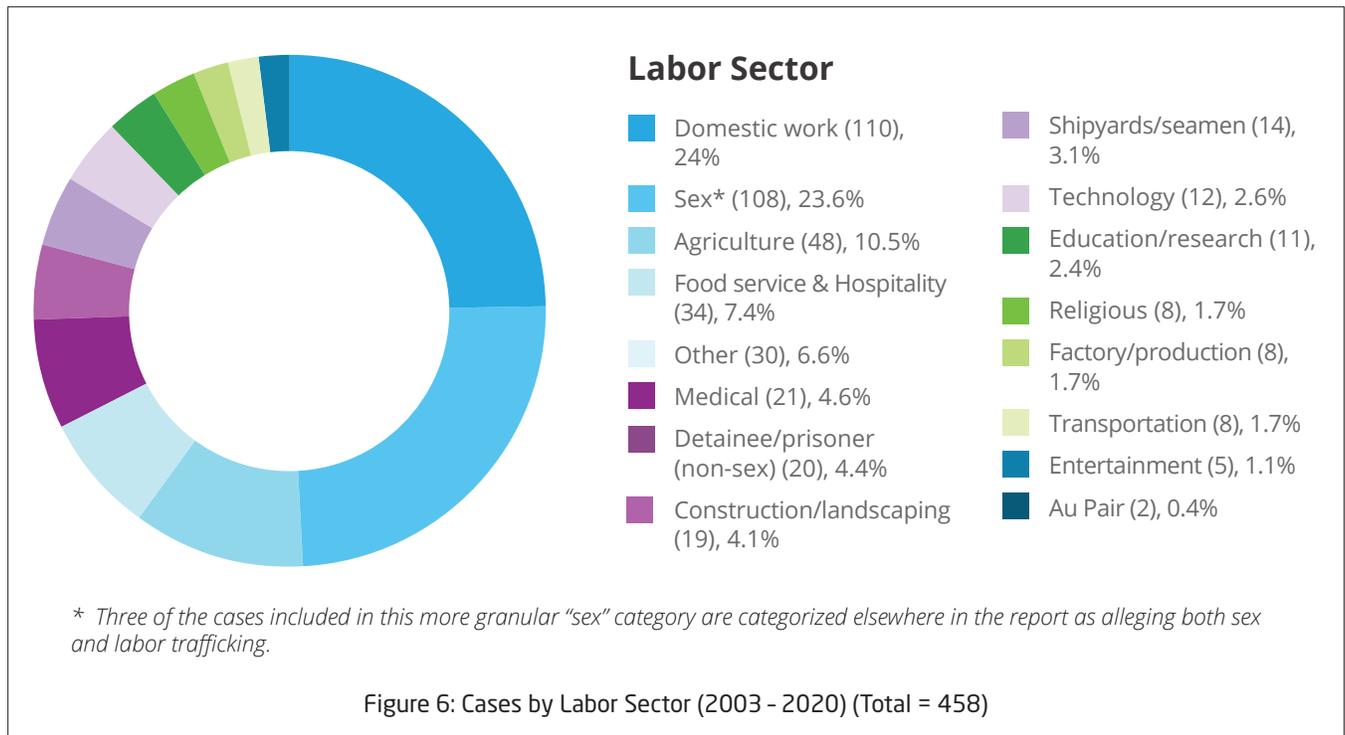
¹⁹ Under 18 U.S.C. § 1596, cases may be brought under the trafficking statutes for crimes committed abroad. See section III. B, *supra* at 8.

IV. Trafficking Civil Litigation: Case Types

A. Cases by Labor Sector²⁰

As of December 31, 2020, plaintiffs had filed 458 cases under the federal civil trafficking provision of the TVPRA.²¹ The majority of these cases – nearly 75% (343) – only included allegations of forced labor; fewer than 25% (105) alleged sex trafficking alone. Ten cases alleged both labor and sex trafficking; for ease of presentation, they have been classified as either labor sex or labor based on which allegations are primary. Thus, civil labor trafficking cases number 350, and civil sex trafficking cases number 108. Cases brought by domestic workers alleging that they had been trafficked into forced labor represented almost a quarter of federal civil filings (110).

As of the end of 2020, federal criminal human trafficking prosecutions continued to focus on sex; nearly 94% of federal human trafficking cases brought between 2009 and 2020 alleged sex trafficking.²² As noted, civil cases tend to focus on labor, suggesting that the civil and criminal causes of action are complements, not substitutes.



²⁰ This chart corresponds with Figure 6 of the 2018 Civil Litigation Report. See Levy, *supra* note 1, at 13.

²¹ As of December 31, 2020. This number does not include 15 cases with nearly identical allegations filed by one plaintiff. For purposes of this report, the cases were counted as a single case.

²² Data on file with the authors.

B. Immigration and Visas in Forced Labor Civil Cases²³

Most foreign-born plaintiffs in federal civil human trafficking cases arrived in the United States with legal visas.²⁴ Although these plaintiffs may not be demographically representative of all trafficking victims, it is worth noting that based on the available information, the number of plaintiffs who enter the United States surreptitiously is tiny — under 5%. The vast majority of the remaining labor trafficking/forced labor victims — including those who alleged both forced labor and sex trafficking — entered the United States with legal visas and employment contracts.²⁵

One growing trend is the use of extraterritorial jurisdiction to bring cases for survivors of forced labor trafficked in global supply chains outside of the United States.²⁶ Between 2003 and 2020, survivors filed 10 cases alleging forced labor outside of the United States.

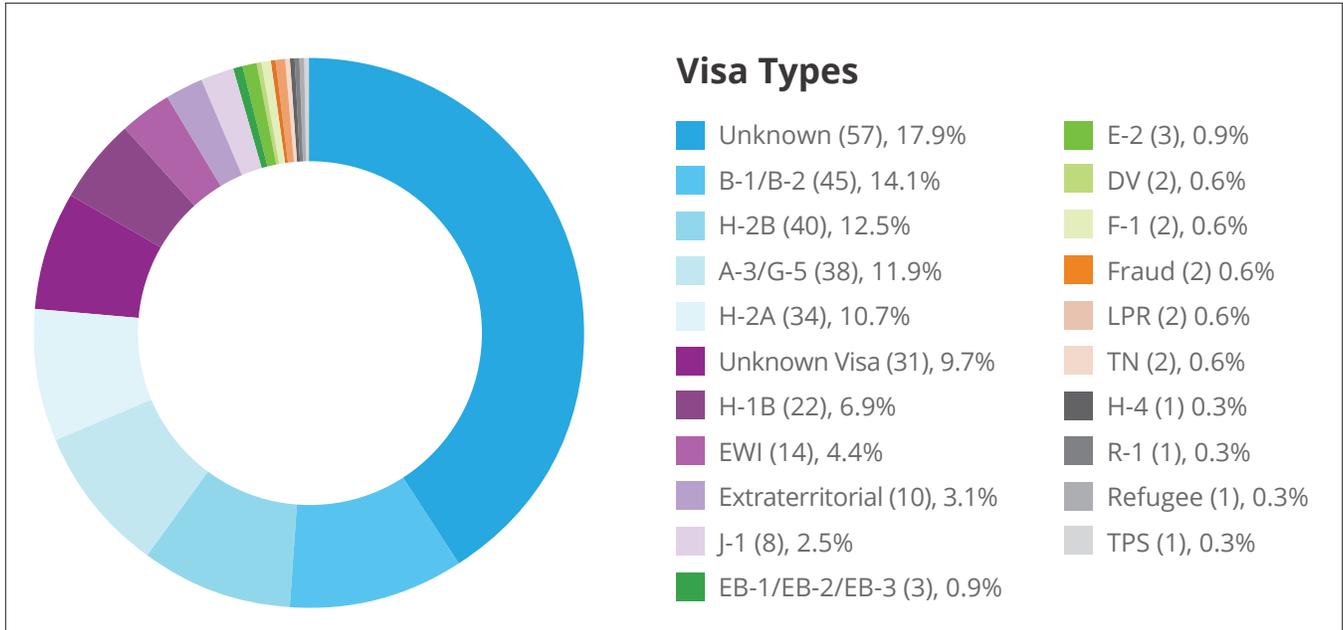


²³ The chart below, on page 14, corresponds with Figure 7 of the *2018 Civil Litigation Report*. See *id.* at 14. This section of the report includes cases alleging both forced labor and cases alleging forced labor and sex trafficking. Additionally, the chart below includes categories of “unknown visa” and “unknown.” For the purposes of this report, “unknown visa” refers to cases with references to the plaintiff(s) having visas, while not specifying the type; “unknown” refers to cases where there is no indication of the plaintiff’s visa status.

²⁴ In 34 of the forced labor cases, plaintiffs were U.S. citizens.

²⁵ In contrast, most sex trafficking-only civil cases (71%) involve plaintiffs who are U.S. citizens (75). The other 30 cases include 26 instances where the plaintiff’s visa status is unknown, three extraterritorial cases, and one case in which a plaintiff held a visa of an unspecified type.

²⁶ The TVPRA permits criminal prosecution and civil liability for human trafficking committed abroad if the perpetrator is a U.S. citizen, a permanent resident of the United States, or present in the United States. 18 U.S.C. §1596.



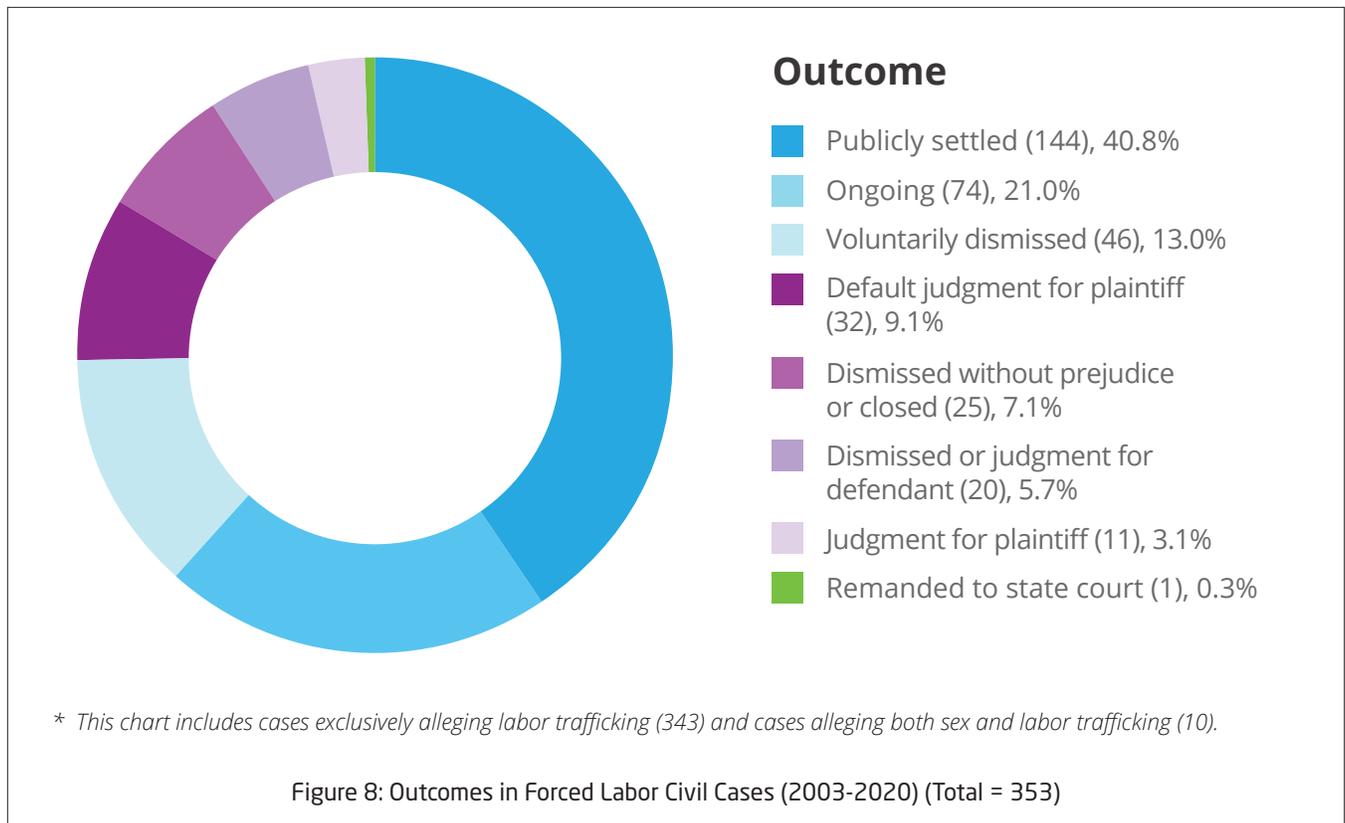
* This chart includes cases exclusively alleging labor trafficking (343) and cases alleging both sex and labor trafficking (10).

Figure 7: Plaintiffs' Visa Types in Forced Labor Civil Cases (2003-2020) (Total = 353)

Visa/Immigrant Status Types			
Type	Recipients	Type	Recipients
A-3/G-5	Domestic workers of foreign diplomats or employees of international organizations	H-2A	Seasonal agricultural workers
B-1/B-2	Visitors for business or tourism and domestic workers	H-2B	Temporary non-agricultural workers
DV	Diversity Immigrant Visa	H-4	Dependants of H-visa holders
E-2	Investors in U.S. businesses	J-1	Cultural and educational exchange opportunities
EB-1/EB-2/EB-3	Persons of Extraordinary Ability in the sciences, arts, education, business, or athletics	LPR	Longterm Permanent Resident
EWI	Entered without Inspection	R-1	Nonimmigrant Religious Workers
F-1	Student Visa	Refugee	Refugee
Fraud	Fraudulent Entry	TN	Nonimmigrant NAFTA Professionals
H-1B	Highly-skilled specialized workers	TPS	Temporary Protected Status

C. Outcomes in Forced Labor Civil Cases²⁷

As of December 31, 2020, more than 40% of forced labor civil cases had resulted in judgments for plaintiffs (11) or public settlements (144). Approximately 13% (46) of cases were voluntarily dismissed.²⁸ Fewer than 6% (20) of cases ended with involuntary dismissals or judgments for defendants; about 7% (24) of cases were dismissed without prejudice, allowing plaintiffs to refile. As of May 1, 2021, 74 forced labor civil cases were ongoing.

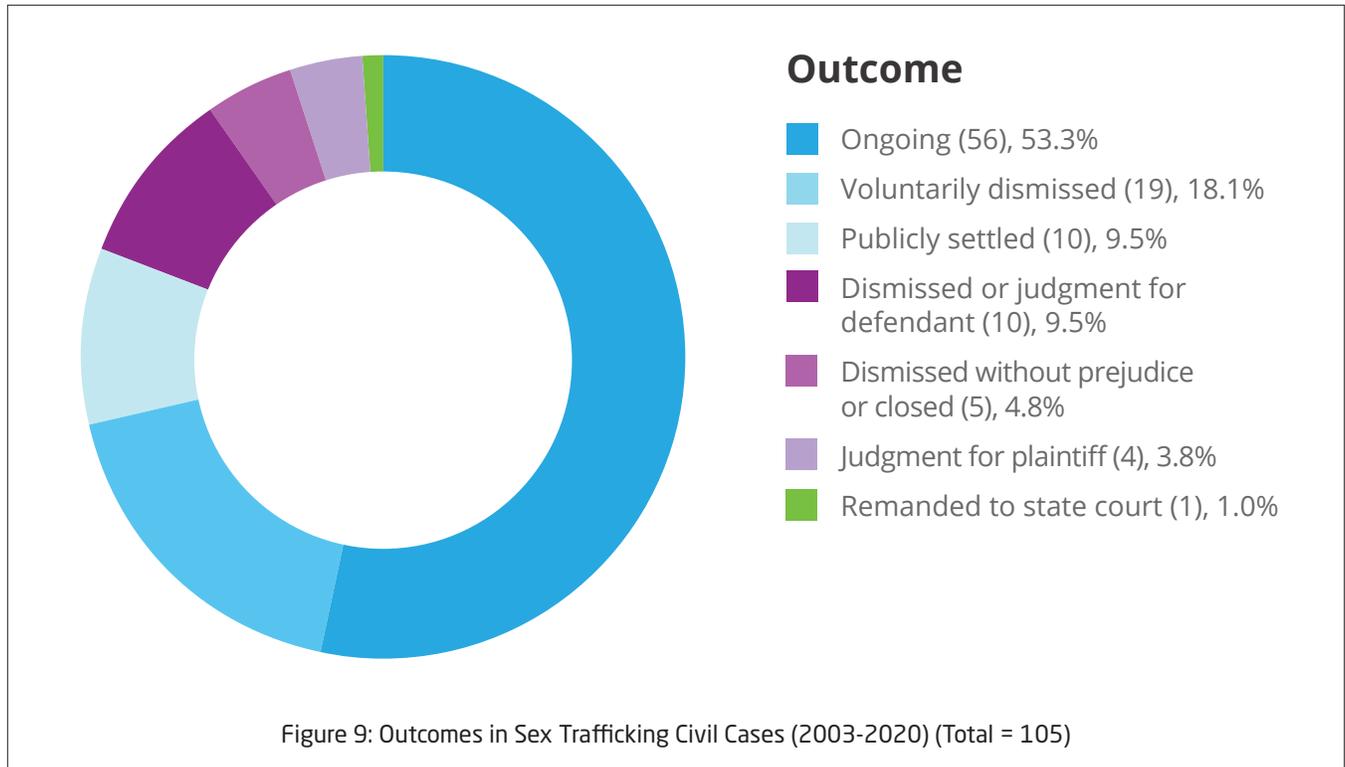


²⁷ This chart corresponds with Figure 8 of the *2018 Civil Litigation Report*. See Levy, *supra* note 1, at 15. This section of the report includes cases alleging both forced labor and cases alleging forced labor and sex trafficking. Additionally, this data includes all cases filed on or before December 31, 2020, but includes status updates current as of May 1, 2021.

²⁸ There are many reasons why cases may be voluntarily dismissed, but voluntary dismissal by a plaintiff often indicates that the parties reached a settlement.

D. Outcomes in Sex Trafficking Civil Cases²⁹

As of December 31, 2020, about a quarter of federal civil human trafficking cases ever filed included only claims of sex trafficking (105). Only about 13% of federal civil sex trafficking cases have resulted in public settlements (10) or judgments for plaintiffs (4), and, similarly, only about 9% (10) have been involuntarily dismissed or ended in a judgment for the defendant. More than one in six cases has been voluntarily dismissed (19); one case was remanded to state court, five cases were dismissed without prejudice, and more than half (56) of cases are ongoing.



²⁹ This chart corresponds with Figure 9 of the *2018 Civil Litigation Report*. See *id.* at 15. This data includes all cases filed on or before December 31, 2020, but includes status updates current as of May 1, 2021.

E. Plaintiffs in Civil Trafficking Cases

Trafficking Plaintiffs' Countries of Origin (2003-2020)³⁰

Figure 10

Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases
Bahamas	2	Eritrea	1	Malaysia	2	Serbia	2
Bangladesh	3	Ethiopia	5	Mali	1	Slovenia	1
Belarus	1	France	1	Mexico	61	South Africa	4
Bolivia	2	Guatemala	12	Moldova	1	South Korea	3
Brazil	3	Guinea	1	Morocco	3	Sri Lanka	2
Burkina Faso	2	Haiti	3	Namibia	1	Sudan	1
Cambodia	4	Honduras	4	Nepal	4	Swaziland	1
Cameroon	4	Hungary	1	New Zealand	1	Syria	1
Canada	4	India	34	Nicaragua	2	Tanzania	2
Chile	4	Indonesia	10	Nigeria	3	Thailand	3
China	6	Ivory Coast	1	Pakistan	4	Turkey	1
Colombia	2	Jamaica	2	Panama	1	Uganda	2
Croatia	1	Jordan	1	Paraguay	1	Ukraine	1
Cuba	1	Kenya	2	Peru	9	United States	108
Democratic Republic of Congo	2	Laos	1	Philippines	61	Vietnam	2
Dominican Republic	2	Liberia	1	Poland	2	Zambia	1
Ecuador	2	Madagascar	1	Romania	1	Zimbabwe	1
El Salvador	1	Malawi	1	Russia	3	Unknown	61

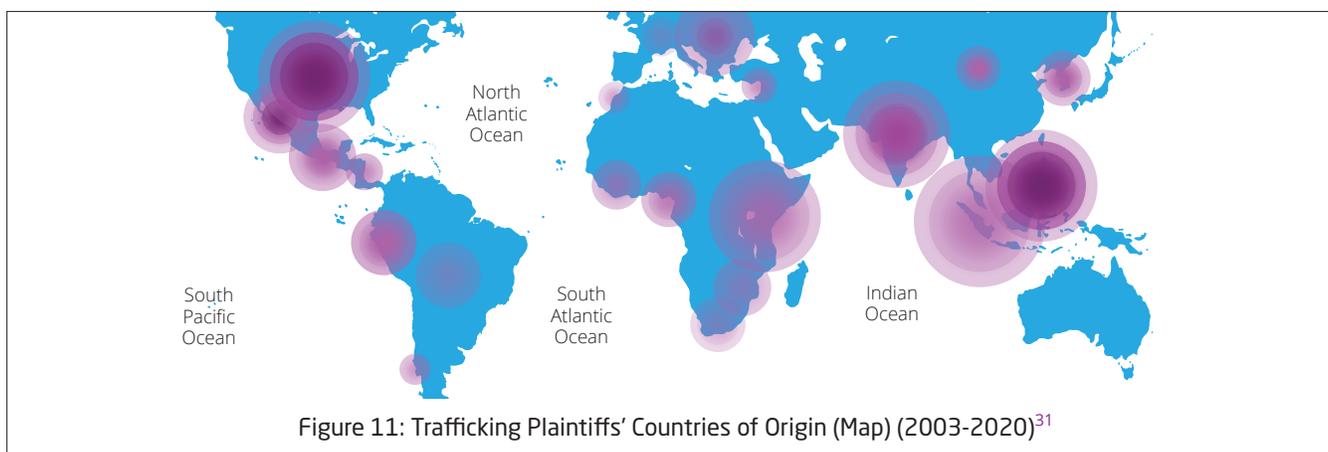


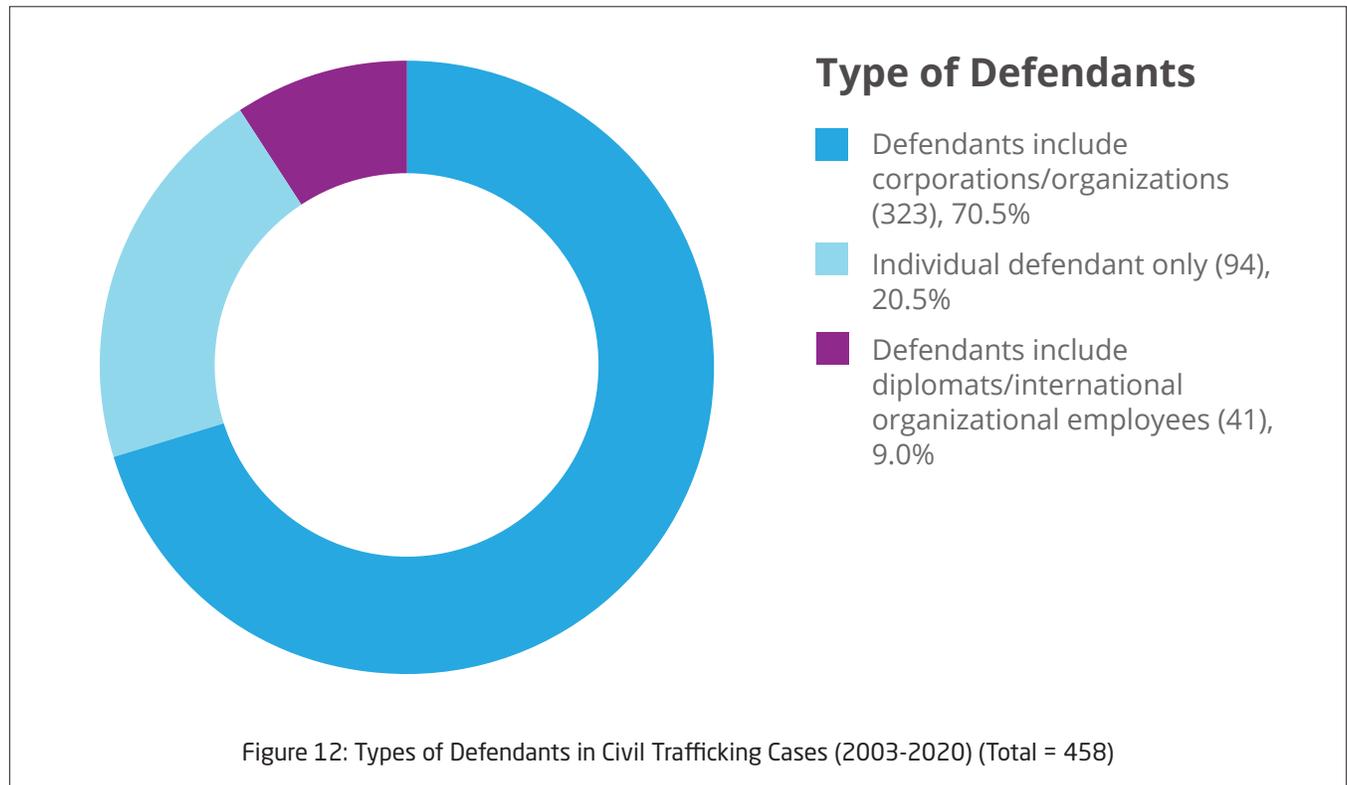
Figure 11: Trafficking Plaintiffs' Countries of Origin (Map) (2003-2020)³¹

³⁰ This table corresponds with Figure 10 of the 2018 *Civil Litigation Report*. See *id.* at 16. The table counts cases and not numbers of plaintiffs; some cases involve plaintiffs from multiple countries and/or plaintiffs with unspecified countries of origin. The number of plaintiffs varies widely. See e.g. Amended Complaint at 1, *David v. Signal International, LLC*, 2:08-cv-01220 (E.D. La. Apr. 29, 2008) (suit brought on behalf of more than 500 Indian workers), Second Amended Complaint at 8, *Nunag-Tanedo v. East Baton Rouge Parish School Board*, 8:10-cv-01172 (C.D. Cal. June 2, 2011) (suit brought on behalf of more than 350 Filipino teachers). The District Court of Colorado recently certified a class of up to 60,000 plaintiffs in a forced labor case brought against the private detention corporation GEO Group. See Order Granting Motion for Class Certification Under Rule 23(b)(3) and Appointment of Class Counsel Under Rule 23(g) at 6, *Menocal v. The GEO Group, Inc.*, 1:14-cv-02887 (D. Colo. Feb. 27, 2017), *aff'd*, No. 17-1125 (10th Cir. Feb. 9, 2018).

³¹ This map corresponds with Figure 11 of the 2018 *Civil Litigation Report*. See *Levy*, *supra* note 1, at 16. As noted above, some cases include plaintiffs from multiple countries.

F. Defendants in Civil Trafficking Cases (2003 – 2020)³²

More than two-thirds (323) of all cases filed as of December 31, 2020, included at least one corporate defendant. Labor recruiters and corporations make up a significant portion of defendants. Case data also include religious organizations, municipalities, private detention facilities, and other corporate entities as defendants.



³² This chart corresponds with Figure 12 of the 2018 *Civil Litigation Report*. See *id.* at 18.

V. Conclusion

Civil litigation under the Trafficking Victims Protection Reauthorization Act (TVPRA) has emerged as an increasingly important tool for trafficking survivors in their fight for justice. This is particularly true for survivors of labor trafficking, who rarely see their cases prosecuted by the federal government.

Broadly speaking, the data in this update show that more civil cases are being filed, by more survivors, in more jurisdictions. Moreover, trafficking survivors are now seeking civil relief under a more diverse set of statutory TVPRA provisions, including the financially benefiting and sex trafficking statutes. However, the data also show that many of the trends identified in the original *2018 Civil Litigation Report*³³ still hold true, even as more cases are filed. With the exception of the explosion of sex trafficking cases, the trends for case outcomes, immigration/visa status of plaintiffs, defendant type, and forced labor sector have remained remarkably steady. The number of cases brought invoking extraterritorial jurisdiction under 18 U.S.C. §1596 also continues to grow.

The Human Trafficking Legal Center remains committed to supporting pro bono attorneys litigating cases for trafficking survivors under the TVPRA. For more information on technical assistance, mentoring, and training, and for access to the Human Trafficking Legal Center's comprehensive federal trafficking civil case database, please visit the website, www.htlegalcenter.org.

³³ See *id.*

VI. Appendices

Appendix A³⁴

Number of Cases Filed Under 18 U.S.C. § 1595 by State (as of December 31, 2020)					
State	#	State	#	State	#
Alabama	5	Kansas	1	Ohio	8
Alaska	1	Kentucky	8	Oklahoma	6
Arizona	2	Louisiana	11	Oregon	10
Arkansas	5	Maine	1	Pennsylvania	8
California	36	Maryland	12	Rhode Island	1
Colorado	14	Massachusetts	5	South Carolina	6
Connecticut	9	Michigan	10	South Dakota	3
Delaware	1	Minnesota	5	Tennessee	6
District of Columbia	15	Mississippi	3	Texas	36
Florida	32	Missouri	6	Utah	3
Georgia	18	New Hampshire	1	Virginia	20
Hawaii	1	New Jersey	9	Washington	7
Idaho	1	New York	96	West Virginia	1
Illinois	13	North Carolina	5	Wisconsin	1
Indiana	9	North Dakota	1	Wyoming	2
Iowa	2	Northern Mariana Islands	2		

³⁴ This table corresponds with Appendix A of the 2018 report. See *id.* at 31.

Appendix B³⁵

Since 2003, courts have awarded plaintiffs at least \$255,298,993.50 in damages as judgments or public settlements. This amount does not include confidential settlements.

Total Damages in Trafficking Federal Civil Cases (2003-2020)		
Year cases closed	Total damages awarded	Number of cases resolved with known damages
2003	\$0.00	-
2004	\$0.00	-
2005	\$0.00	-
2006	\$68,318.00	1
2007	\$15,000.00	1
2008	\$8,770,374.05	2
2009	\$9,000,966.58	3
2010	\$500,000.00	1
2011	\$3,077,147.82	3
2012	\$19,536,378.68	8
2013	\$9,930,682.79	7
2014	\$732,562.24	2
2015	\$15,357,351.00	5
2016	\$18,135,598.68	10
2017	\$11,658,212.81	7
2018	\$9,516,829.16	7
2019	\$64,235,522.11	11
2020	\$84,764,049.58	5
Total	\$255,298,993.50	73

³⁵ This table corresponds with Appendix C of the 2018 report. *See id.* at 33. For the limited purposes of this update, Appendix B of the original report has been omitted.

Appendix C³⁶

Federal Trafficking Civil Cases Filed by Year by Type of Case (2003-2020)			
Year Filed	Labor Only	Sex Only	Both
2003	-	-	-
2004	6	-	-
2005	6	-	-
2006	2	-	-
2007	9	-	-
2008	17	-	-
2009	15	1	-
2010	20	2	-
2011	26	4	-
2012	17	1	1
2013	30	4	-
2014	25	1	-
2015	25	2	-
2016	26	1	1
2017	32	7	-
2018	28	8	-
2019	37	47	4
2020	22	27	4
Total	343	105	10

³⁶ This table corresponds with Appendix D of the 2018 report. *See id.* at 34.



About The Human Trafficking Legal Center

The Human Trafficking Legal Center connects trafficking survivors with pro bono representation so that survivors can seek justice and thrive. We are a bridge to justice. We demand accountability from traffickers, from governments, and from corporations. We shine a light on the system failures that allow trafficking to flourish. We advocate for survivors as agents of change and as leaders in the movement. We fight for systems change to end forced labor, including forced labor in global supply chains.

Learn more at:

www.htlegalcenter.org