

2025 Annual Report



VILLANOVA UNIVERSITY
CHARLES WIDGER SCHOOL OF LAW

THE INSTITUTE TO ADDRESS
COMMERCIAL SEXUAL EXPLOITATION

2025

Thank you for reading our 2025 Annual Report.

The Villanova University Charles Widger School of Law Institute to Address Commercial Sexual Exploitation (CSE institute) provides legal research, technical assistance, policy consultation, and training to partners throughout Pennsylvania, the United States, and internationally.

To partner with the CSE Institute or support our work, please contact our director,
Shea M. Rhodes, Esq. PHONE: 610-519-7183
EMAIL: shea.rhodes@law.villanova.edu

For more information about our work, please visit our website: <https://cseinstitute.org>

Thank you to LBDesign for the design and development of our website.



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Our Team

Shea M. Rhodes

Co-Founder and Director;

Michelle Madden Dempsey

Co-Founder and Faculty Advisor;

Joanne Curley

Senior Justice for Victims Fellow

September 2022-November 2024

We would like to thank the following CSE Institute research assistants, student externs, and volunteers who contributed to research and writing this report:

Research Assistants

Riley Crouthamel, '25

Kaitlyn Furst, '25

Julia Smith, '25

Student Externs

Elizabeth Ellick, '26

Allison Gherovici, '25

Liam Hudson, '26

Patrick Hurley, '25

Aimee Ojwang, '25

Julia Snyder, '26

Alex Taylor, '26

Pro Bono

Rachael Cook, '25

Maria Elisa Escobar, '26

Sydney Ryan, '26



Our Mission

We educate and provide technical assistance to those who respond to commercial sexual exploitation in Pennsylvania, the United States and beyond, promoting victim-centered, trauma-informed multidisciplinary collaboration.

We equip policy-makers and the broader community with the skills and knowledge they need to improve the legal system's response to commercial sexual exploitation, in order to support survivors and hold perpetrators accountable.

We center the experiences of survivors to inform the development of policies and best practices to combat commercial sexual exploitation and are committed to engaging the survivor community in shaping our positions.

We aim to create a community in which every human being is treated with dignity, compassion, and respect inspired by Villanova University Charles Widger School of Law's Catholic and Augustinian mission.

Meet Our Co-Founders



Shea M. Rhodes,

a national expert on laws and policies related to sex trafficking, commercial sexual exploitation, and systems of

prostitution, is the Co-Founder and Director of the CSE Institute. Her career is dedicated to combating violence against women and she works to protect the rights of those who are oppressed or exploited. Ms. Rhodes is a member of several local, state and national anti-trafficking initiatives. Currently, through a grant awarded to the CSE Institute in 2024 by the Pennsylvania Commission on Crime and Delinquency (PCCD), Ms. Rhodes chairs the Statewide Human Trafficking Coordination Project. Ms. Rhodes' work at the Charles Widger School of Law also includes teaching the course Human Trafficking, which seeks to address human trafficking from the legal and policy perspectives. This course explores the laws related to the various needs of human trafficking survivors, rhetoric, and popular culture perceptions of human trafficking, and how to respond to the diverse physical, emotional, and psychological needs of survivors through trauma-informed lawyering skills. Ms. Rhodes regularly conducts trainings and presentations throughout the Commonwealth and nationally including developing and teaching continuing legal education classes on trauma-informed lawyering for practicing attorneys. Ms. Rhodes' written materials, including policy papers, legal resources, and newsletters, can be found on the [CSE Institute website](#).



Michelle Madden Dempsey,

the Harold Reuschlein Scholar Chair and Professor of Law, is the CSE Institute's Co-Founder and Faculty

Advisor. At Villanova, she teaches in Criminal Law, Evidence, and Sexuality and the Law. An internationally renowned scholar on criminal law philosophy, especially concerning CSE and violence against women, Dempsey is an elected member of the American Law Institute and a Fellow of the American Bar Association. She recently published the foreword to the new volume, *Is It Wrong to Buy Sex?* (Routledge 2024), and is currently finalizing a chapter on Catharine A. MacKinnon's *Toward a Feminist Theory of the State* for inclusion in the volume, *Leading Works in Philosophy of Law* (Routledge 2026). Her works-in-progress include the Cambridge Elements monograph on Consent in Law. In the past year, she has presented her scholarship at numerous universities, including Oxford University, University College London, University of Toronto, Columbia University, Georgetown University, Notre Dame University, and University of California-Irvine. Dempsey also serves as the co-Editor-in-Chief of the leading journal in her field, *Criminal Law & Philosophy* (Springer Publishing), and is a co-founder and Executive Committee member of The Collective, an organization dedicated to supporting women scholars in the field of legal philosophy.

A Message from Shea

This year the CSE Institute has focused on centering the experiences of our client's entanglements with various legal systems and policies to ensure anti-trafficking law reform promotes meaningful change for victims and survivors. Our 2025 Annual Report focuses on ways the Commonwealth can enhance our comprehensive human trafficking statute by remaining focused on the law's blueprint of **prosecution, prevention, and protection**.

I have had the distinct pleasure of having worked with over 140 Villanova law students during the last 11 academic years. Although based in the law school, our work is outward facing and grounded in what victims and survivors experience in our court systems, how to make those experiences better through legislative reforms, and ensuring that as future lawyers our student provision of legal services will be trauma informed. This amazing generation of law students will truly change the world for the better. I am proud of our work and deeply committed to eradicating the root causes of exploitation and making the world a safer place for women, girls, and marginalized populations.

This year, our focus has been on engaging those in positions of power to harness their political will and use their authority to advocate for meaningful change to Pennsylvania's laws. First, we must look at **prosecution** and focus not only on targeting traffickers but the whole system that drives the market for exploitation which means the prosecution of sex buyers and facilitators. The human trafficking chapter in the crimes code must be simplified and consolidated to ensure that prosecutors can focus on protecting the most vulnerable among us. Second, the General Assembly must appropriate funds to focus on **prevention** by rolling out a state-wide public awareness campaign, including the anti-demand campaign referred to in the Safe Harbor for Sexually Exploited Children law. Finally, we must pass laws to ensure victims and survivors are **protected**. Specifically, the vacatur and affirmative defense laws must be expanded. Simply stated – our Commonwealth must garner the political will to ensure our laws do the *right* thing for the *right* reasons.

On behalf of the CSE Institute, I thank you for reading our 2025 Annual Report on Commercial Sexual Exploitation in Pennsylvania. As we move forward in this next chapter, I hope you find this report helpful, and I invite you to learn more about our mission and vision for the future of the anti-exploitation movement in our communities. It is my sincere wish that you will be inspired to join us in advocating for meaningful changes that will ensure victims and survivors lives are made significantly better. We must advocate to ensure our laws are grounded in the **prosecution** of true offenders, **prevention** of sex trafficking and exploitation from happening in the first place and finally ensuring that the law **protects** those who need it the most.

Thank you.

A handwritten signature in black ink that reads "Shea". The signature is fluid and cursive, with a long, sweeping underline.

The Institute in Review

Since 2014, the Institute to Address Commercial Sexual Exploitation has worked tirelessly toward our mission to eradicate injustice and amplify dignity. In our 11 years, we report the following:

>19K
HOURS WORKED BY
MORE THAN

140
STUDENT
EXTERNS



3 ANTI-
TRAFFICKING
LAWS PASSED
AND

5 BILLS PENDING IN
PENNSYLVANIA

THAT INCORPORATE OUR EXPERTISE AND THE LIVED
EXPERIENCE OF OUR CLIENTS

>400

TRAINING SESSIONS HELD
THROUGHOUT THE STATE
AND NATIONALLY

>2100

INDIVIDUALS TRAINED IN
OUR "ENHANCED
COLLABORATIVE TO
ENHANCE HUMAN
TRAFFICKING" TRAINING

250+

AGENCIES AND
INDIVIDUALS WHO HAVE
RECEIVED TECHNICAL
ASSISTANCE FROM THE
CSE INSTITUTE

CSE Institute Externship Program

Each semester, a select group of second- and third year Villanova law students are chosen to participate in a for-credit externship with the CSE Institute.

GOALS OF THE EXTERNSHIP PROGRAM

Customized Experience.

The CSE Institute encourages externs to engage in projects that fall at the intersection of our mission and their interests, creating a unique, selfdirected externship experience for each student.

Learn the Law.

Through becoming familiar with laws regarding trafficking, prostitution, and commercial sexual exploitation, externs learn to confidently summarize, apply, and critique the law.

Strengthen Legal Skills.

Externs strengthen and diversify their research and writing skills by drafting policy papers, compiling research findings, conducting legislative and policy analysis, and contributing to the CSE Institute online blog.

Understand the Issue.

Interacting with victims and survivors and creating a “real world” connection with their work allows externs to understand the reality of commercial sexual exploitation and its consequences.

Gain Real World Experience.

Contributing to the representation of survivors of sex trafficking in criminal record clearing matters including expungement, vacatur, pardons, and clemency gives externs hands-on legal experience.

Build a Legal Network.

Externs have the opportunity to meet and cultivate relationships with judges, lawyers, advocates, and other professionals working to address commercial sexual exploitation in Pennsylvania and beyond.

This year, our extern classes consisted of the following students:

Fall 2024

Maria Elisa Escobar, '26
Allison Gherovici, '25
Patrick Hurley, '25
Aimee Ojwang, '25
Sydney Ryan, '26
Cady Tobin, '26

Spring 2025

Elizabeth Ellick, '26
Allison Gherovici, '25
Liam Hudson, '26
Patrick Hurley, '25
Aimee Ojwang, '25
Julia Snyder, '26
Alex Taylor, '26



"Externing with the CSE Institute has been one of the most rewarding experiences of my law school journey. I've had

the opportunity to deepen my understanding of an often-misunderstood issue while learning how to advocate for those impacted by human trafficking. The CSE Institute fosters important, thoughtful conversations, and it's been incredible to be apart of that work. I'm forever grateful for the insight and skills I've gained during my time here."

Aimee Ojwang, '25



"I joined the CSE Institute as an extern because I wanted to become knowledgeable about commercial sexual

exploitation and its effects on the lives of so many individuals. Being a part of the CSE Institute has instilled in me a deeper understanding of what occurs on a daily basis, and I am grateful to now instill this knowledge to those who are uninformed of these issues."

Liam Hudson, '26



"I joined the CSE Institute to better understand how emerging technologies like AI and social media intersect with human

trafficking, particularly in how they influence traffickers, facilitators, and victims. During my time here, I've gained valuable insight into the local resources available to survivors in Pennsylvania. I've also learned about the critical gaps that remain, which can be addressed through greater awareness, education, prosecution, and funding."

Patrick Hurley, '25



"I love being an extern in the CSE Institute because it has helped me become a more well rounded future prosecutor. By

learning trauma informed approaches and shifting my mindset regarding legislation that surrounds survivors of trafficking, I feel more confident than ever about how to use prosecutorial discretion for the greater good!"

Rachael Cook '25

Why Extern with Us?

**THE LAW
IN ACTION**

THE

LAW

W

IN

ACTION

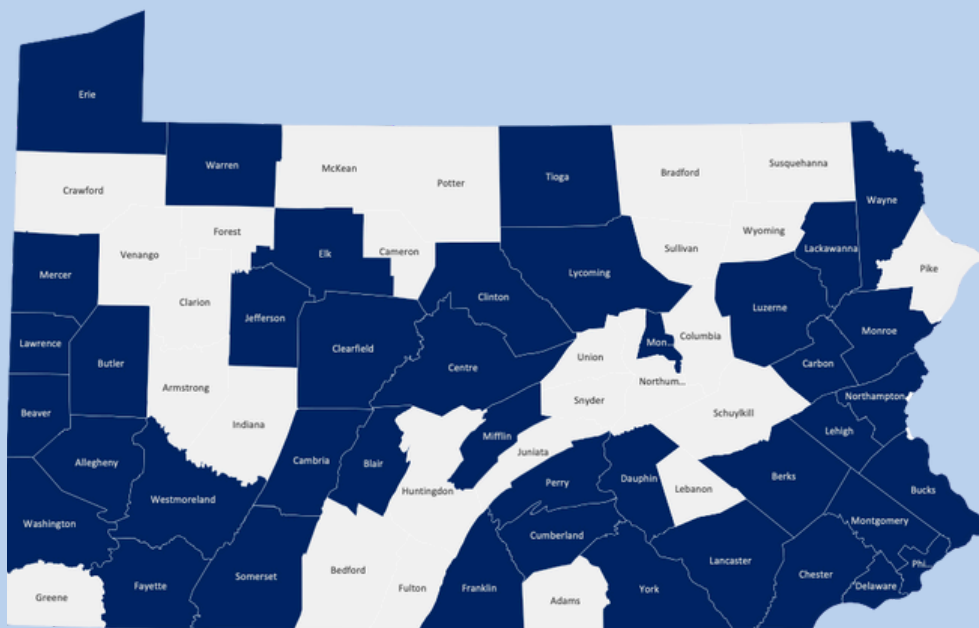
2024 Pennsylvania Trafficking Charge Statistics

Since our inception in 2014 coinciding with the passage of Pennsylvania's comprehensive human trafficking statute, the CSE Institute has tracked criminal charges across the Commonwealth for crimes involving sex trafficking and systems of prostitution. These charges fall under two statutory umbrellas: sex trafficking charges under Chapter 30 and Prostitution and Related Offenses under 18 Pa.C.S. § 5902.

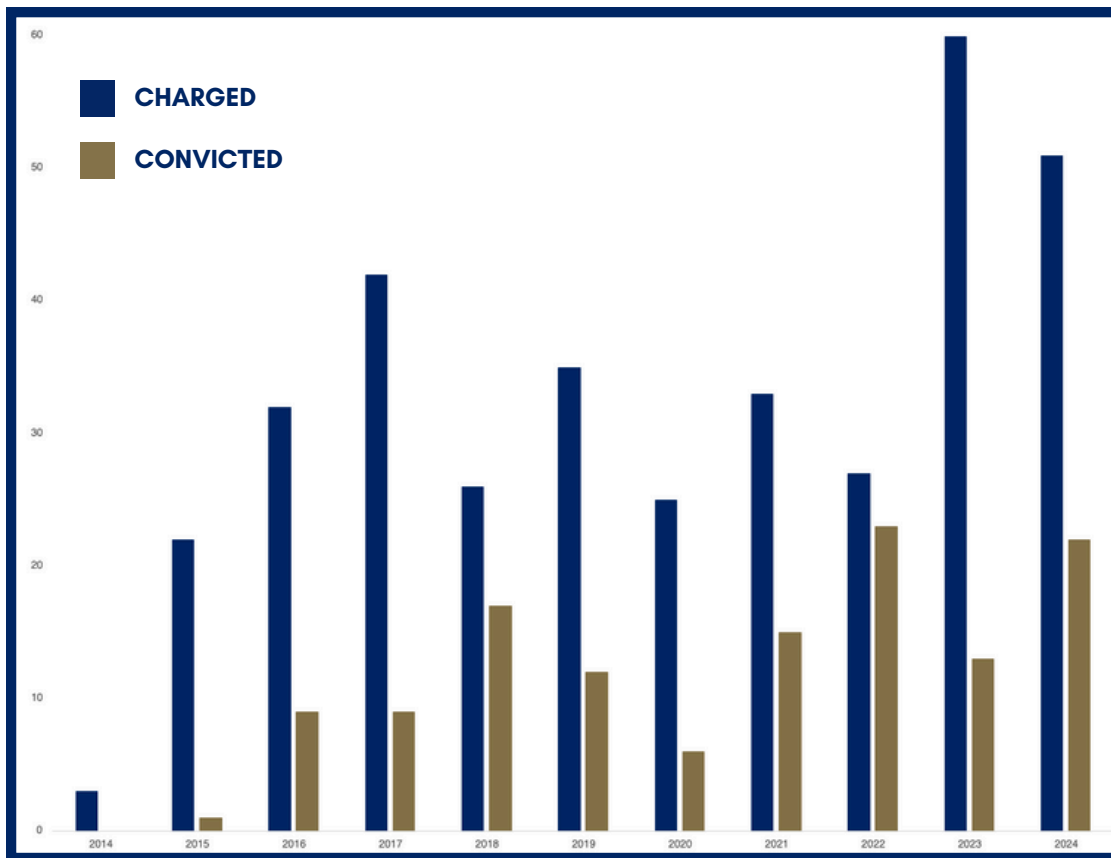
In 2024, **19 counties** charged a trafficking related case against a total of **51 defendants**.

The CSE Institute has tracked trafficking related case data through both the media and the Administrative Office of Pennsylvania Courts. These data show that between 2014 and the end of 2024, prosecutors in **38 counties** have used the law to charge trafficking related offenses against **356 defendants**.

COUNTIES THAT HAVE CHARGED A DEFENDANT WITH TRAFFICKING

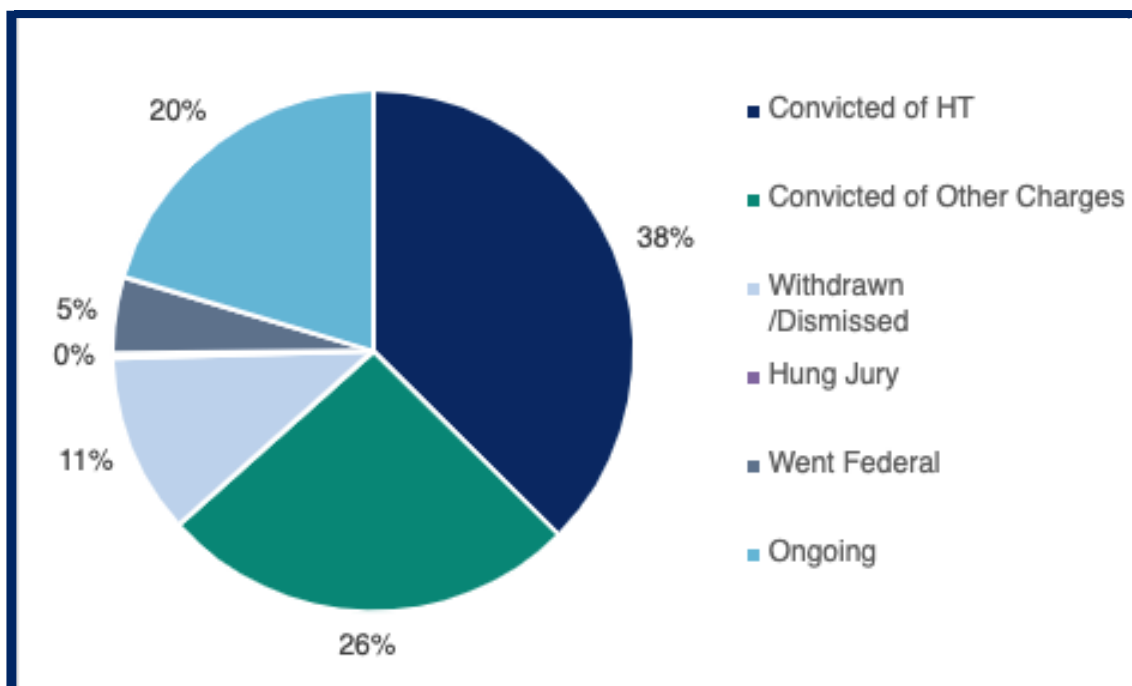


DEFENDANTS CHARGED AND CONVICTED OF TRAFFICKING BY YEAR



CASE OUTCOMES SINCE LAW WAS ENACTED

Of the 356 defendants charged with human trafficking since the law was enacted in 2014, **126 were convicted**.



2024 Pennsylvania Prostitution Charge Statistics

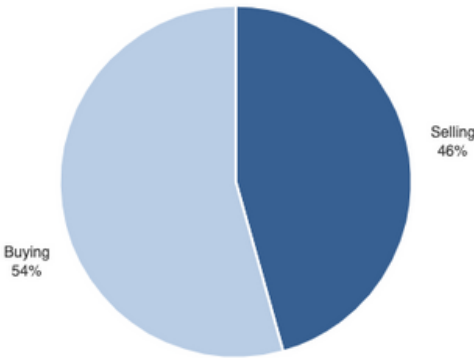
The CSE Institute has been tracking prostitution related charges since our inception. In 2024, for the fourth straight year, there were more arrests for buying sex.[1] than there were for selling sex.[2].

While the statewide data show a shift in focus to demand, this trend does not necessarily reflect a change in philosophy throughout the Commonwealth. These data are largely driven by four counties: Philadelphia, Lancaster, Berks, and Cumberland. These four counties account for 78% of total arrests for sex buying. On the other hand, 8 of the 18 counties who charged any prostitution related offense in 2024 arrested more individuals for selling sex than for buying sex.

OF THOSE CHARGED WITH BUYING SEX, **100% WERE MEN.**

OF THOSE CHARGED FOR SELLING SEX, **70% WERE WOMEN.**

CHARGES FOR 5902(E) VS 5902(A)



County	Selling	Buying
Allegheny	20	3
Beaver	1	2
Berks	7	27
Blair	2	1
Bucks	7	6
Butler	1	0
Chester	3	2
Clearfield	0	1
Cumberland	5	27
Dauphin	2	12
Lackawanna	51	2
Lancaster	24	29
Lehigh	1	6
Lycoming	0	1
Mercer	3	3
Philadelphia	21	59
Washington	1	0
York	3	0
Total:	152	181

PROSECUTION

Overview of Policy Recommendation 1: **PROSECUTION** *OF HUMAN TRAFFICKERS*



To effectively combat human trafficking in Pennsylvania, we must center accountability on those who drive and profit from this abuse. Traffickers, facilitators and sex buyers form a **criminal ecosystem** that relies on **impunity, weak enforcement, and outdated laws to continue exploiting vulnerable individuals**. Despite their central role, these exploiters frequently escape meaningful consequences due to legal loopholes, under-prosecution, and an overemphasis on penalizing victims instead.

Pennsylvania must take a bold and unequivocal stance: no one who profits from the exploitation of another human being should be shielded by vague statutes, technicalities, or plea deals that minimize harm. Justice must be measured not just in convictions, but in our **commitment to dismantling systems of abuse** and ensuring survivors are no longer silenced while exploiters walk free.

We propose the following solutions:

- **Strengthen the prosecution of sex buyers, facilitators and traffickers by simplifying Chapter 30 of the crimes code.**
- **Remove the defense for lack of knowledge of the victim's age completely from § 3018.**

A GUIDE TO CHARGING A CASE USING PENNSYLVANIA'S COMPREHENSIVE HUMAN TRAFFICKING LAW

Pennsylvania's comprehensive human trafficking law is outlined in 18 Pa.C.S. § 3011-3012. To find someone guilty of trafficking in individuals under this law, there is a simple equation:

ACTS + MEANS + PURPOSE = SEX TRAFFICKING.

The law is comprehensive because it is designed to target not only traffickers, but all actors that contribute to or perpetuate the sex trade, such as sex buyers and those that facilitate commercial sexual exploitation, for example drivers, hotel staff, and financial managers.

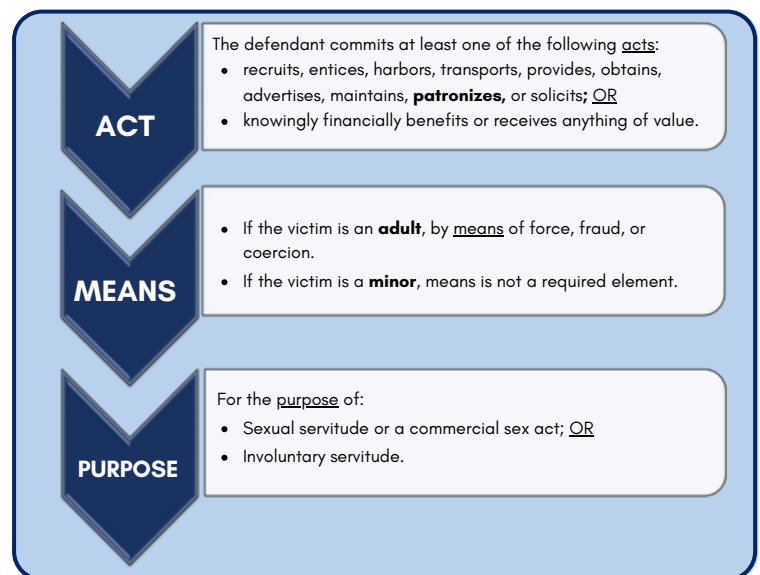
Taking a look at this equation a bit further, to prove the crime of sex trafficking, the government must prove that the defendant committed *one or more* of several enumerated **acts** outlined in § 3011(a) for the **purpose** of commercial sex. If the victim is not a minor, the government must also prove that the defendant committed the act by *one or more* **means** of force, fraud, or coercion outlined in § 3012(b).

If the victim is a minor, means do not need to be proven under § 3011(b), the trafficking in minors provision, because minors cannot consent to being bought or sold for sexual acts. [3] Indeed, there is no such thing as a minor prostitute or child prostitute; there are only victims and survivors of child rape.[4]

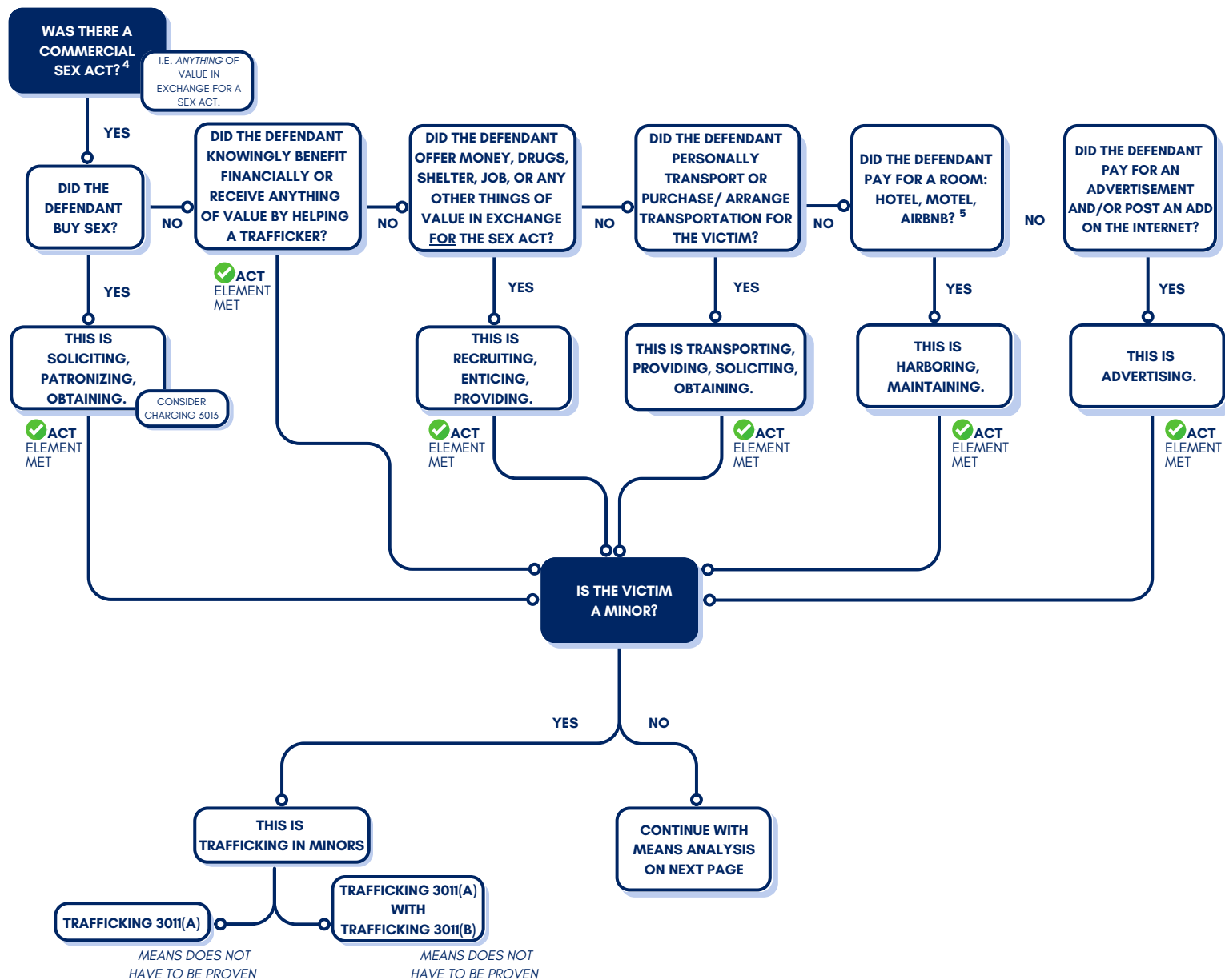
The tools in this guide are intended to be a supplement to investigations and analyses. The scenarios contained therein are not exhaustive representations of the acts or means that may satisfy 18 Pa.C.S. § 3011-3012. For more real-world examples

of situations that satisfy Pennsylvania's comprehensive human trafficking law, see the News section of our website.[5]

ELEMENTS OF SEX TRAFFICKING UNDER 18 Pa.C.S. § 3011-3012



18 Pa.C.S. § 3011-3012. Trafficking in individuals¹ & Involuntary Servitude² for purposes of Sexual Servitude³



MUST PROVE:

VICTIM IS A MINOR

VICTIM WAS SUBJECTED TO SEXUAL SERVITUDE (AS DEFINED IN 3001) AND DEFENDANT ENGAGED IN A COURSE OF CONDUCT SUBJECTING MINORS TO SEXUAL SERVITUDE⁶

1. Mens Rea: Knowingly or with Reckless Disregard

2. Mens Rea: Knowingly

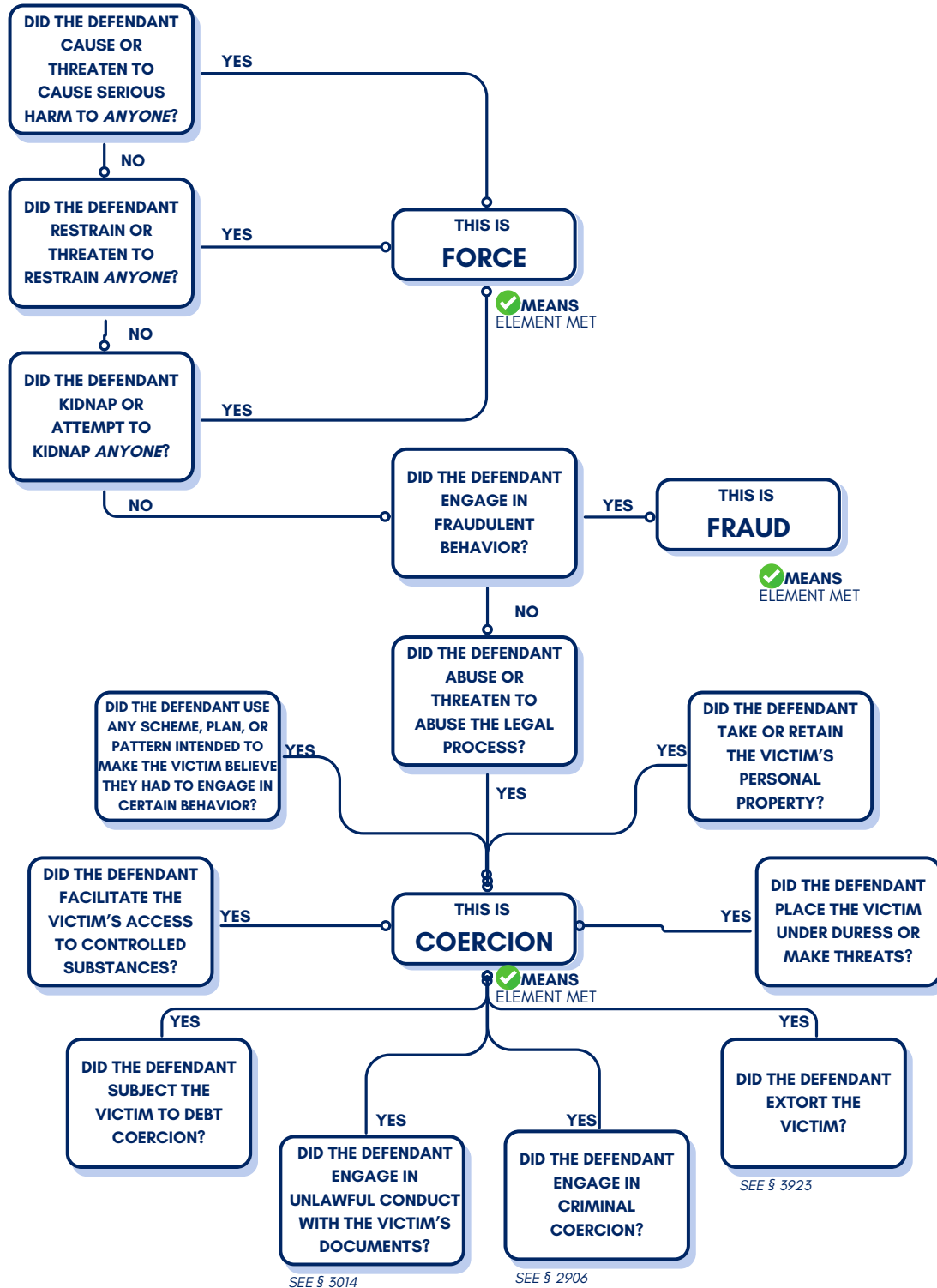
3. "Sexual Servitude." A commercial sex act or a sex act which is performed or provided by any individual and is induced or obtained from: (1) A minor (2) Any other individual by any of the means set forth in section 3012(b).

4. Sex act as defined in § 3001 "Sex act." Any touching or exposure of the sexual or other intimate parts of any individual for the purpose of gratifying sexual desire of any individual."

5. This list is not exhaustive. Defendant could pay rent or mortgage on a private home, other rental properties or even business establishments like "strip clubs".

6. Don't forget to consider co-occurring crimes such as unlawful contact with a minor, sexual assault crimes, etc.

18 Pa.C.S. § 3011-3012. Trafficking in individuals¹ & Involuntary Servitude² for purposes of Sexual Servitude³



1. Mens Rea: Knowingly or with Reckless Disregard

2. Mens Rea: Knowingly

3. "Sexual Servitude." A commercial sex act or a sex act which is performed or provided by any individual and is induced or obtained from: (1) A minor (2) Any other individual by any of the means set forth in section 3012(b).

THE PROSECUTOR'S GUIDE TO HUMAN TRAFFICKING: PREVENTION, PRACTICE, AND PROTECTION



September 27, 2024



8:30 AM - 12:15 PM



**Villanova University Charles Widger School of Law,
John Scarpa Hall**

Section 1: Human Trafficking Legal Updates

*Presented by: Heather Castellino,
Esq., Chief Deputy Attorney
General, Human Trafficking Unit
& Trooper Jessica L. Williams
PSP Special Investigation
Division, Organized Crime Human
Trafficking Coordinator*

Section 2: “Understanding Trauma: Enhancing Responses to Human Trafficking Survivors”

*Presented by: Molly Ferris &
Heather LaRocca, The
Salvation Army, New Day to
Stop Trafficking*

Section 3: Techniques in Human Trafficking Investigations and Prosecution

*Presented by: Justin
Ashenfelter, Esq. & Priya De
Souza, Esq., Assistant US
Attorneys, EDPA*

On September 27, 2024, the CSE Institute hosted a CLE training titled “The Prosecutor’s Guide to Human Trafficking: Prevention, Practice, and Protection” for prosecutors, law enforcement officials, and anti-trafficking stakeholders across Pennsylvania. The event brought together experts from the Pennsylvania Office of the Attorney General, Pennsylvania State Police, the Salvation Army’s New Day to Stop Trafficking Program, and the U.S. Attorney’s Office for the Eastern District of Pennsylvania to provide in-depth legal, practical, and trauma-informed perspectives on addressing human trafficking.

The first session, led by **Chief Deputy Attorney General Heather Castellino and Trooper Jessica Williams**, provided legal updates on Pennsylvania’s human trafficking statutes, including the 2014 law (18 PA C.S.A. §§ 3001 et seq.) and the 2024 enhancement that reclassified “patronizing” as a trafficking offense to better address demand. The presenters broke down the elements of trafficking—act, means, and purpose—and emphasized the importance of understanding coercion, especially when linked to substance dependency. Additional legal developments included stronger penalties for witness intimidation and the use of expert witnesses to educate juries about the complex realities of trafficking.

FORCE	FRAUD	COERCION
Causing or threatening harm	False promise of a better life, safety, employment, education, a relationship, or citizenship status to induce compliance	Facilitating or controlling access to controlled or illegal substances
Physically restraining		Abusing or threatening to abuse the legal system: <i>calling DOJ or ICE; or reporting to a probation officer</i>
Kidnapping or attempted kidnapping **Less than 1% of trafficking is from stranger abduction	*All are subjective to the survivor.	Scheme plan or pattern of manipulation that may result in serious harm or physical restraint to person or another
		Threat of connecting with possible abusers in survivor’s home country
		Violent or dangerous reputation of a trafficker
		Debt coercion

Molly Ferris from The Salvation Army’s New Day to Stop Trafficking Program delivered a powerful session on trauma and survivor-centered care. She explained how trauma dysregulates the nervous system, leading survivors to cycle between hypervigilant and dissociative states. Drawing on polyvagal theory, Ferris outlined the six principles of trauma-informed care—safety, trust, peer support, collaboration, empowerment, and cultural humility—stressing that survivors must define their own sense of safety and readiness to engage.

The final session, presented by **Assistant U.S. Attorneys Justin Ashenfelter and Priya de Souza**, focused on investigative and prosecutorial strategies. They explored victim vulnerabilities, trafficker profiles, and the wide array of tactics traffickers use to exploit victims—including emotional manipulation and online recruitment through platforms like Snapchat, Instagram, and Listcrawler. Practical challenges such as language barriers, victim reluctance to testify, and retraumatization were also addressed.

Attendees left with stronger tools to prosecute traffickers, support survivors, and collaborate across disciplines to end human trafficking in Pennsylvania and beyond.

Interview with Chief Deputy Attorney General

HEATHER CASTELLINO



Chief Deputy Attorney General Heather Castellino has been prosecuting human trafficking cases in the Commonwealth for over fifteen years. After graduating from Villanova Law, she worked as an Assistant District Attorney in Bucks County for 5 years, where she specialized in appellate work. In 2000, she began working for the Attorney General's Office where she primarily worked in the Organized Crime Section, however she recognized it missed the mark of her focus to help victims.

In 2007, Chief Deputy Castellino received a case from an Organized Crime trooper involving a victim who, at the time, she and her colleagues did not know was a victim of human trafficking. Working with the old statutory framework which pre-dates the Commonwealth's comprehensive human trafficking law, she built a case using the corrupt organizations statute with prostitution as the predicate act. Aside from resulting in a successful prosecution, the case served as turning point in her career and a teaching moment for how to truly be victim-centered. Slowly, her entire case load became human trafficking cases and she began to advocate for a specialized section equipped with the right resources.

Almost two decades later, Chief Deputy Castellino was promoted to head the newly created Human Trafficking Unit in January 2024. Although there is still work to be done in building best practices in Pennsylvania, she says the way her unit approaches human trafficking cases is completely different from other cases in her office. In addition to working towards a successful prosecution, the mindset of the team she works with is centered around supporting the victims identified in their cases which includes a newly grant-funded Victim Administrator position. She also focuses on working with trusted community partnerships with victim service providers across the Commonwealth, such as The Salvation Army's New Day to Stop Trafficking caseworkers.

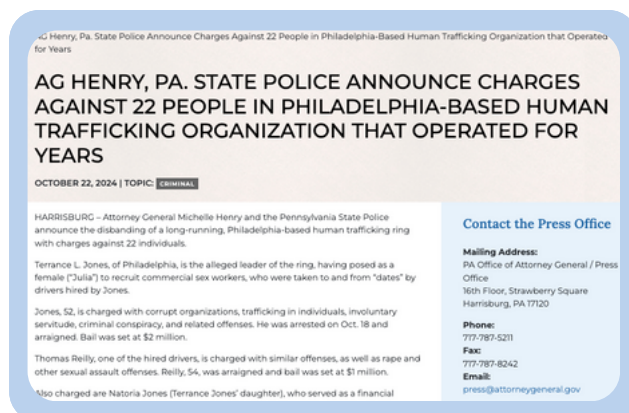
One thing that has always been clear to Chief Deputy Castellino is that people in prostitution are victims, not offenders.

This extends beyond not arresting victims for prostitution-related offenses but also recognizing that additional crimes victims may be charged with are perpetrated through forced criminality and directly related

to trafficking victimization. When a person in prostitution is being arrested and charged with a crime, whether or not it appears related to trafficking victimization on its face, it should raise a red flag. It is a potential sign that person is a victim of human trafficking. Chief Deputy Castellino expressed that education is equally needed for prosecutors and public defenders.

Public defenders must be instructed on how to recognize the signs of trafficking to then refer the case to law enforcement or prosecutors to look into as long as attorney client privilege is maintained. She further emphasized the need for prosecutors to be leading the charge in granting survivors criminal record relief, and it is critically important that a survivor's cooperation with law enforcement should not be a factor into whether their conviction is subject to vacatur. [6]

October 2024: the Pennsylvania Attorney General Charged 22 People in Connection with a Northeast Philadelphia Trafficking ring.



Through her background in organized crime, it was easy for Chief Deputy

Castellino to see commercial sex buyers as facilitators in a trafficking organization. She explained however, that trying to convince a jury that a commercial sex buyer should have known a person is being trafficked is one of the biggest hurdles in charging them with a trafficking related offense. The law's limitations, the Attorney General's lack of jurisdiction over prostitution and related offenses, and society's attitude towards buying sex make it difficult to target commercial sex buyers. This is precisely why the Attorney General's investigation in October 2024 marked a shift in how Pennsylvania confronts the commercial sex trade. [7]

Through a grand jury investigation, Chief Deputy Castellino and her section targeted all actors that make money from trafficking, facilitate the trafficking organization, and drive the market for it to exist in the first place. The leader, financial manager, drivers and 16 commercial sex buyers were all charged with multiple counts of trafficking related offenses for their roles in allegedly exploiting the victims.[8]

For Chief Deputy Castellino, publishing the names of the alleged commercial sex buyers was especially important because ***“despite not being charged with human trafficking, without the sex buyers there would be no trafficking organization, so they should not get more consideration than those charged with trafficking.”***

In her own words, charging commercial sex buyers makes buyers and society aware that buying sex is not acceptable and that shutting down a trafficking enterprise must

include targeting the very market that drives the business to exist in the first place.

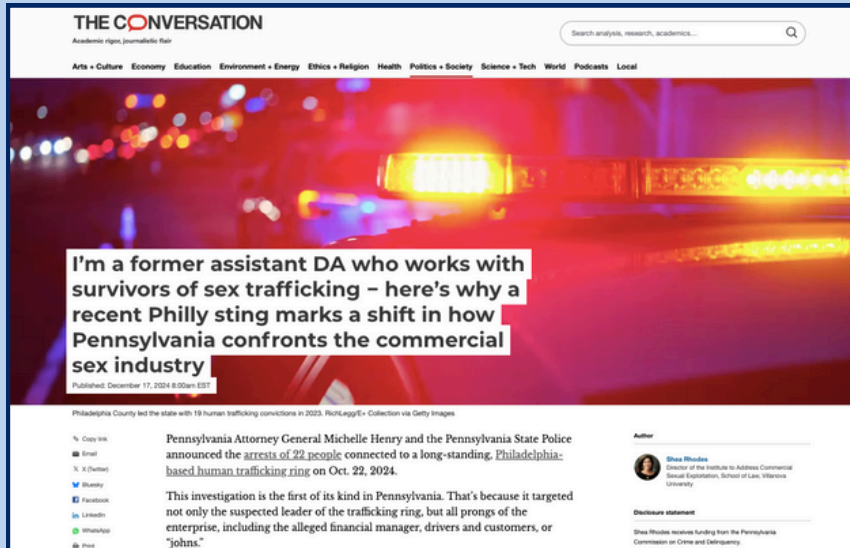
As a prosecutor, Chief Deputy Castellino shared that her number one priority is educating the public because they are ultimately going to be the jurors. Despite being able to educate jurors through expert testimony, a basis of knowledge on what human trafficking is before coming in can change the outcome of a case. She stated that most of the public does not rely on research but instead looks to the media and films such as *Anora* and *Sound of Freedom* which miss the mark on what the commercial sex trade really is.[9] Together with public education, the media's storytelling plays a substantial role in stopping human trafficking.

With law enforcement's improved understanding of sex trafficking, an emphasis on victim-centered prosecution, and a multi-disciplinary approach, the Commonwealth has made distinct progress in the last 15 years. However, most advances made by the Commonwealth have been solely focused on sex trafficking. Chief Deputy Castellino expressed that when it comes to labor trafficking, "we are way behind." Although at their core, labor and sex trafficking involve exploitation, they are not the same and require different resources. Though some vulnerabilities that expose someone to a heightened risk of exploitation are seen in both labor and sex trafficking, lack of citizenship for example, is seen much more in labor trafficking cases. This small distinction informs the increased need for tools such as interpretation and humanitarian relief for victims



who come forward in labor trafficking cases. Although education on labor trafficking is in its beginning stages, Chief Deputy Castellino hopes that this will inform the Commonwealth's focus to eradicate all forms of trafficking in Pennsylvania for the next 15 years.

PHILADELPHIA: A Leader in Anti-Demand Investigations



On December 17, 2024, Shea Rhodes and Riley Crouthamel CWSL '25 published a piece in the Conversation US discussing how the Pennsylvania Attorney General's October 2024 sting marks a shift in how law enforcement confronts the commercial sex trade in Pennsylvania.[10]

Sex trafficking functions as an illicit economic system driven by the interdependent roles of traffickers, buyers, and victims. Each relies on the others, and without one, the cycle collapses.[11] Where profit exists, facilitators such as drivers, financial managers, security personnel, and third-party businesses like motels and hotels emerge to support the enterprise. To dismantle this system, prosecutors and law enforcement must understand its interconnected nature. An effective response targets the entire operation while ensuring survivors are treated as victims, not criminals.

In Philadelphia County, trafficking has flourished, outpacing the rest of Pennsylvania, due to law enforcement's siloed approach. By investigating buyers and sellers in isolation through operations like prostitution stings, the broader enterprise remains untouched. Of the 115 trafficking-related convictions in Pennsylvania from 2014 to 2023, **43% occurred in or around Philadelphia**. [12]

Beginning under former Pennsylvania Attorney General Michelle Henry and continuing under newly elected Attorney General Dave Sunday, a shift is underway. In 2024, a series of arrests in Philadelphia marked a more integrated approach that recognizes the interconnected nature of trafficking networks. In October 2024, the Pennsylvania State Police arrested 22 people, who were charged by the Attorney General's Office in connection with a long-running human trafficking ring.

All actors in the enterprise were charged, including the trafficker, customers, financial managers, drivers, and trusted confidants. The charges ranged from trafficking in individuals to involuntary servitude, promoting prostitution, and patronizing prostitution.

Both federal [13] and Pennsylvania state [14] laws allow charging individuals beyond enterprise leaders under trafficking statutes, and prosecutors should leverage these laws to ultimately dismantle the entire trafficking enterprise.

Human trafficking is defined as a violent crime involving the recruitment, enticement, solicitation, patronization, advertisement, harboring, transportation, provision, obtaining, or maintenance of an individual through force, fraud, or coercion for commercial sex.

The CSE Institute commends the Attorney General's October 2024 prosecution for not charging any victims with prostitution, recognizing the inherently exploitative nature of trafficking. Prosecuting victims only deepens their stigma and makes it harder for them to escape the life.

We hope the Pennsylvania State Police and the Attorney General's Office continue working with local and federal partners to strengthen collaboration, share knowledge, and reduce the harm caused by traffickers across the United States.



PREVENTION

Overview of Policy Recommendation 2: **PREVENTION** *OF HUMAN TRAFFICKING*



While the last several decades have marked significant progress in amplifying human rights and promoting equality, much work remains. **Prevention is powerful**; ending trafficking starts with stopping it before it begins: **the demand**.

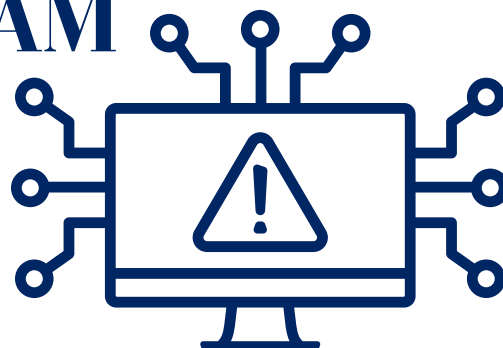
As a society, if we succeed in curbing the demand for paid sex before the harm is done, we can successfully prevent human trafficking in our community. We can achieve this by curating a culture in which buying sex is seen for what it really is: a grave violation of human rights **deeply rooted in gender-based violence and gender, racial, and socioeconomic inequality**.

We do this through social awareness and education. In this case, the law already provides us the tools we need, we just need to use them.

We propose the following solutions:

- **Call for an appropriation to execute the anti-demand campaign already outlined in § 3064.**
- **Consolidate the funds separately called for in Chapter 30 into one fund to be managed by PCCD.**

THE NEW FRONTIER: How AI-Generated CSAM Perpetuates Demand & the Need for Innovative Prevention



The rise of artificial intelligence has introduced new and alarming challenges in the fight against child sexual abuse material (CSAM). With artificial intelligence (AI) on the rise and being more widely available to consumers and common-people, AI-generated CSAM has also begun to run rampant.[15] AI-generated CSAM refers to images, videos, or other media created by artificial intelligence tools that realistically depict the sexual abuse or exploitation of minors.[16] According to the Internet Watch Foundation's (IWF) latest report on AI, there has not only been a general increase in the volume of AI-generated CSAM, but also a troubling rise in its severity. The IWF found a growing number of AI-generated sexual abuse videos in which adult pornographic content is digitally altered to add a child's face (known as "Deepfaking"). Additionally, the report noted an increase in AI-generated CSAM appearing on commercial sites, as well as alarming cases where AI technology was used to create exploitative material featuring known victims and famous children.[17]

Even though no physical abuse may occur in the production of AI-generated CSAM, experts agree that such materials still cause real-world harm as they normalize child sexual exploitation, perpetuate demand for CSAM, and create trauma for survivors whose identity may be used or mimicked without consent.[18]

With that, a key issue with AI-generated CSAM is that many current laws were written before the progression of AI tools being capable of creating realistic imagery. Prosecutors often face challenges proving criminal liability under statutes that require proof of harm to an identifiable victim. [19] Additionally, the low barrier for generating such material increases the risk of widespread dissemination. In Pennsylvania, legislators addressed this emerging threat. Senate Bill 1213, enacted as Act No. 125 in 2024, amended Title 18 of Pennsylvania's Consolidated Statutes to criminalize the dissemination of an "artificially generated sexual depiction of an individual."

The legislation also expanded existing CSAM laws to explicitly include “artificially generated sexual abuse material” within the offenses of selling, distributing, transferring, viewing, or possessing CSAM.[20] Notably, in April 2025, a York County man was the first person in Pennsylvania to be charged under this law aimed at combating the production of child sexual abuse material that uses AI-generated images.[21] Therefore, it is important that we continue to prosecute individuals under this law when appropriate, and we are hopeful that every state begins to recognize this issue.

Although AI has been used to further the spread of CSAM, there have also been AI programs that have flipped the script and use AI to actively work against CSAM.

Thorn’s “Safer Predict” uses AI detection to identify potential CSAM content on hosting platforms before it can be widely distributed. Street Grace’s “Transaction Intercept” monitors online behavior to disrupt trafficking networks at the transaction level with an AI-generated person speaking to potential sex buyers, helping law enforcement intervene earlier. ActiveFence’s “Active Score” specifically targets newly generated CSAM, enhancing moderation capabilities. Microsoft’s “PhotoDNA” AI technology enables the identification of children in suspected CSAM content. Marinus Analytics, a woman-owned and led AI company, uses artificial intelligence to recover victims online and aid law enforcement in catching traffickers.

Additionally, big companies like Google and YouTube have also contributed to online safety through the Content Safety API and CSAI match, which scan and match images against known CSAM databases to rapidly flag illegal material. With there being many other AI programs that combat the growing issue of CSAM, these initiatives demonstrate that while AI can be weaponized for exploitation, it also holds immense potential to strengthen child protection efforts and assist in bringing perpetrators to justice.

PROTECTION

Overview of Policy Recommendation 3: **PROTECTION** *OF VICTIMS & SURVIVORS*



Survivors of human trafficking deserve **protection and justice — not criminal records**. Yet too often in Pennsylvania, they are arrested or prosecuted for actions they were forced to take while being exploited. **No one should be criminalized for their own victimization.**

Pennsylvania must expand legal remedies that empower survivors to rebuild their lives. This includes broadening access to vacatur laws so survivors can clear unjust convictions, strengthening restitution mechanisms to ensure they are compensated by their exploiters, and enforcing their right to participate in the justice process without fear. Survivors need trauma-informed support, not barriers. It is time our legal system stopped retraumatizing those who have already suffered, and started **standing firmly on their side**.

We propose the following solutions:

- **Provide meaningful protections for victims and survivors by expanding vacatur and affirmative defense remedies in § 3019.**
- **Amend § 3020 so that victims are eligible to receive restitution.**

PROTECTING VICTIMS AND SURVIVORS: THE EQUALITY MODEL

The Equality Model prioritizes the rights of those who have been exploited while holding the buyers and exploiters accountable, instead of criminalizing victims.[22] This legal framework originated in Sweden in 1999 as a tool to combat commercial sexual exploitation while promoting gender equality, and argues for social services for those who are prostituted or trafficked.[23] *The Equality Model rests on the premise that the sex trade is deeply rooted in gender inequality and gender-based violence.*[24] It importantly shifts the target of criminal prosecution away from victims that have been forced into commercial sexual exploitation, and instead looks to the traffickers, sex buyers, and other third-party facilitators, such as brothels and online advertisers, who perpetuate and profit from this harmful system.[25]

KEY PRINCIPLES OF THE EQUALITY MODEL



DECRIMINALIZATION of the prostituted person.



CRIMINALIZATION of sex buyers, traffickers, and facilitators.



PUBLIC EDUCATION CAMPAIGNS on the harms of prostitution on society.



COMPREHENSIVE EXIT SERVICES funded for those exploited in the sex trade.

The Equality Model comprises four key principles, including the **decriminalization** of the prostituted person, **criminalization** of sex buyers and facilitators, **public education campaigns** on the harms of prostitution on society at large, and funded **comprehensive exit services** for those who are exploited in systems of prostitution. [26] Central to this model is focusing on targeting the demand for commercial sex and educating sex buyers on the consequences of their actions.[27] National awareness campaigns funded by the government play a critical role in targeting this demand and shedding light on the gendered nature of the sex trade and its impact on society as a whole.[28]

SWEDEN: ABOLITIONIST APPROACH

In the first two years,
50%+ DECREASE of street
prostitution + a significant
decrease in sex buying.[39]

10% OF MEN and
0.5% OF WOMEN report buying
sex in their lifetime.[40]

In a 2023 survey,
0.8% OF MEN report buying
sex in the past year.[41]

0 MURDERS of prostituted people
by sex buyers reported since the law
was passed in 1999.[42]

Sweden illustrates the positive impact of the Abolitionist Approach that The Equality Model promotes. When the sex purchase ban went into effect in 1999, the country saw a fifty percent decrease in street prostitution and a notable decline in the number of men purchasing sex within the two years after the law was implemented.[29] On the other hand, alternative models that decriminalize or legalize systems of prostitution normalize the purchase of buying or selling other human beings as a “victimless crime,” or not even a crime at all.[30]

In countries that have adopted the alternative models that fully decriminalize or legalize prostitution, the demand for prostitution has increased. For example, Germany legalized purchasing sex in 2002 and today over one million men purchase sex every day in Germany.[31] Berlin, the capital of Germany, has over five hundred brothels and 150,000 people in prostitution, and a 2008 study shows that the rates of violence against women in prostitution did not decrease when the country legalized the sex trade.[32] The study also shows prostituted persons did not feel safer and were not more likely to report abuses they experienced to authorities.[33]

GERMANY: PROSTITUTION LEGALIZED

400,000+
prostituted persons.[35]

101 trafficking convictions in
2022.[36]

1.2 MILLION+ men buy sex
every day.[37]

169 MURDERS of
prostituted people
reported from 2002–
2023.[38]

Supply grows to meet demand, meaning the commercial sex trade will continue to thrive while the demand remains in place. Countries that legalize or fully decriminalize the sex trade fail to hold the buyers accountable, further growing the demand. The Equality Model criminalizes the buying of sex while providing support and resources for those who want to leave the sex trade. However, for the Equality Model to be successful in the United States, there must be inter-organization cooperation and relationship building among different agencies and institutions, such as hospitals, schools, district attorneys, public defenders, and law enforcement.[34]

If we can achieve this, the evidence shows that the Equality Model is the legal paradigm that is most effective in actually eradicating the sex trade while supporting those harmed by it.

THE KEYS TO JUSTICE: Civil Litigation as a Tool for Change in the Hospitality Industry



Hotels and motels are some of the most common venues for facilitating and financially benefitting from sex trafficking as they provide both easy entry and financial secrecy for sex buyers.[43] Because of their unique position, hotels have been held both criminally accountable and civilly liable for their role in sex trafficking under the Trafficking Victim’s Protection Act (TVPA).[44] The TVPA has allowed survivors to sue anyone who knowingly benefits from their exploitation under federal law, which includes both traffickers and sex buyers.[45] Additionally, Pennsylvania law also allows a survivor to bring forth a cause of action against anyone who profits from their victimization, which could impose liability on the hotel as a corporate entity and the individual hotel employee who rented the room to the trafficker.[46] Although these civil lawsuits will not erase the horrors survivors have faced, these high-profile civil cases will help to increase public awareness about sex trafficking.

In 2023 and 2024, Pennsylvania saw several high-profile civil cases against hotels, illustrating the importance of this impactful work. Notably, these civil cases continued in 2025 with yet another high-profile civil case.

On March 13, 2025, the owners of a Motel 6, Days Inn, and North American Motor Inn in Philadelphia agreed to pay \$17.5 million to three women who were sex trafficked at the hotels.[47]

The plaintiffs, who were between 14 to 17 years old at the time, were trafficked at the hotels between May 2015 and January 2017.[48] The civil lawsuit that was filed on behalf of the three survivors alleged that the hotels were negligent because they did not have proper security to prevent criminal activity on the property and that employees were not adequately trained to identify sex trafficking.[49]

Nadeem Bezar and Emily Marks of Kline & Specter, PC, represented the survivors in this civil case. When asked about the settlement, Attorney Marks stated the following:

“Instead of hiring qualified security and adoption and enforcement policies against criminal activity, the hotels did nothing and permitted criminal activity to the detriment of our clients.”[50]

The CSE Institute urges the hospitality industry to take ownership of this problem and confront it with tangible solutions.

These solutions could include mandatory trainings for all management and employees to help them recognize the signs of sex trafficking in hotels and what to do if they suspect trafficking. The CSE Institute also urges the industry to stop turning a blind eye to the commercial sexual exploitation happening within their hotels. Instead, hotels and motels should become a leading force in stopping this exploitation altogether. The CSE Institute recognizes the need for legislation that would require these types of trainings, policies, and procedures to be implemented in every hotel and motel across the country. In fact, there is proposed legislation in Pennsylvania that seeks to mandate hotel trainings across the Commonwealth.[51] This pending legislation is moving towards a solution to eliminate exploitation in these hotels.

While there has been an increase in hotels being held civilly responsible in the United States for their inaction, there are significant concerns that insurers in the hospitality industry will try to limit their liability.

Currently, Pennsylvania is facing a challenge by insurance companies to circumvent their duty to indemnify and defend in these cases. The result of these cases could significantly impact the current framework of hotel litigation in Pennsylvania and could severely limit the recovery that survivors receive in these cases.

In March 2023, U.S. District Judge Chad F. Kenney granted both a motion for judgment on the pleadings and motion to dismiss based on the idea that public

policy considerations do not permit insurance coverage for those involved in enabling human trafficking.[52]

The decision to dismiss this case against the hotel's insurance companies was based on the idea that shielding policyholders from the consequences of their criminal conduct would be "against the safety, morals, and welfare of the Commonwealth." [53] The Court's decision in *Samsung Fire & Marine Ins., Co. v. UFVS Mgmt. Co., LLC* is based on the idea that the insured in this case knowingly benefitted "from acts facilitating the trafficking scheme" since they rented rooms to traffickers, and even if they did not knowingly benefit, they still ignored the clear signs that trafficking was occurring in their hotels. [54]

The decision in *Samsung Fire & Marine Ins., Co.* was appealed to the United States Third Circuit Court. However, on August 12, 2024, the Third Circuit Court filed a Petition for Certification of Question of State Law certifying the following questions of law to the Pennsylvania Supreme Court: (1) "Does Pennsylvania have an "overriding public policy" against sex trafficking... such that an insurer's duty to defend and/or indemnify is abrogated when an insured is alleged to have enabled or profited from such trafficking?; and (2) If yes, is that duty abrogated whenever the insured's alleged conduct would constitute a violation of 18 Pa. Cons. Stat. § 3011(a)... that a person will be subjected to sexual servitude or (2) 'knowingly benefit[ing] financially' from such activity, or is the duty abrogated only when an insured's conduct was allegedly 'intentional'...?"[55]

This Petition was granted by the Pennsylvania Supreme Court on October 8, 2024. As of the date of this Annual Report, both parties have filed their respective briefs before the Pennsylvania Supreme Court, however, oral argument

has not been scheduled. Multiple amicus briefs were filed in the Pennsylvania Supreme Court as well. Until *Samsung Fire & Marine Ins., Co.* is decided by the Pennsylvania Supreme Court, other Pennsylvania cases involving similar issues with insurance companies being responsible for covering these settlement amounts have been stayed pending the Court's decision.[56]

The issues pending in Samsung Fire & Marine Ins., Co. illustrate a concerning trend of insurance companies attempting to circumvent their duty to defend or indemnify the hotels that they insure.

It is important to note that if insurers are excluded from liability for trafficking lawsuits, it would severely limit a survivor's ability to seek civil remedies for their victimization at these hotels. [57] Instead of restricting coverage, insurers should discuss the potential legal ramifications of human trafficking lawsuits with their insured so that they are aware of the consequences of turning a blind eye to what is occurring in their hotels. Insurers should advocate for legislation regarding mandatory human trafficking training in hotels and require that employees complete this training as part of their policies. Moreover, it is likely that if insurers begin to limit their liability for hotels, then insurers for short-term residences that rent out through platforms like Airbnb and VRBO may also follow, severely limiting survivors' access to financial settlements further.

CYD BERGER

was twenty-five years old when her trafficker, Dwayne Hicks, murdered a sex buyer and forced her to help dispose of the body.[58] For four years, Cyd endured ongoing abuse at the hands of her trafficker, who physically abused her, threatened her family, kidnapped her son, and forced her into prostitution to fund his drug addiction.[59] In 1980, while Cyd was in another room, her trafficker committed the murder and then compelled her to assist in moving and disposing of the body.[60] After enduring further abuse, Cyd eventually turned herself in and cooperated in the arrest of her trafficker.[61]



Painting by Mary DeWitt

Despite her cooperation and the circumstances of her involvement, Cyd was convicted of first-degree murder, robbery, credit card theft and conspiracy and pled guilty to theft by unlawful taking and conspiracy.[62] Cyd was then sentenced to life in prison without the possibility of parole.[63] The court never factored into her sentence the years of abuse and coercion she endured.

The justice system treated her solely as a perpetrator, ignoring the reality that she was also a deeply traumatized victim.

Cyd's story is an illustration of the victim-offender overlap. Trafficking victims are frequently coerced into criminal activity by their traffickers.[64] These acts include offenses committed in direct retaliation to abuse or those carried out under coercion.[65] Despite the role of the criminal justice system in helping victims of crime, flaws in the system create scenarios where the courts are treating victims as the criminals themselves.[66]

As a result, many human trafficking survivors are in similar situations to Cyd, with a criminal record filled with convictions that stem directly from their exploitation.[67] In addition to the harm inflicted by traffickers, they face systemic harm through the criminal justice system's failure to provide adequate relief or support.[68] Without meaningful mechanisms such as

vacatur or “second look” laws, survivors are left with a criminal record following them for life, often cycling them through the system with little hope for rehabilitation or reintegration.[69]

To truly support survivors and break the cycle of re-victimization, current relief mechanisms must be expanded. [70]

Adequate relief requires broadening the scope of “second look” sentencing laws to ensure that all crimes committed as a direct result of or proximately caused by trafficking victimization are considered for resentencing, including violent offenses. Additionally, resentencing laws must provide courts with the ability to overcome mandatory minimum sentences, allowing judges more discretion in determining appropriate sentences for survivors who are not adequately served by rigid sentencing guidelines.

To protect survivors like Cyd, broad, uniform protections must be available to all survivors across the country.

Adequate protection requires implementing consistent policies and laws that acknowledge and address survivors’ unique challenges, regardless of where their charges were filed. Without these protections, survivors are left vulnerable to be re-victimized by a system that fails to recognize the long-term, compounding effects of trauma. When survivors are prosecuted or blamed for actions directly resulting from the abuse they endured, it traps them in a cycle of further harm.[71]

The legal and social systems must also recognize that the experiences of survivors like Cyd are often impacted by manipulation, coercion, and fear, which can deeply impact their decision-making. Until there is a national commitment to providing meaningful protection and support, survivors will continue to face systemic barriers that prevent them from moving beyond their past. We must work towards offering survivors the comprehensive support they need and ensure they have access to the resources necessary to rebuild their futures. Only then can we offer survivors who have been prosecuted a true path forward, helping them break free of their past.

ALIGNING FORCES: A STATEWIDE NETWORK TO PREVENT AND RESPOND TO HUMAN TRAFFICKING

The CSE Institute is proud to partner with the Pennsylvania Commission for Crime and Delinquency (PCCD) to develop a comprehensive, public-facing website dedicated to coordinating anti-trafficking resources across the Commonwealth. Scheduled to launch later this year, this platform is designed to strengthen Pennsylvania's statewide response to human trafficking by achieving the following key objectives:



Centralize Resources: Identify and make publicly accessible a wide array of relevant resources, training opportunities, and technical assistance materials focused on human trafficking, all developed through a victim-centered and trauma-informed lens.



Enhance Interagency Coordination: Improve collaboration among state agencies and key stakeholders in the healthcare, criminal justice, public safety, victim services, and allied sectors.



Standardize Training and Materials: Promote consistency and accessibility in the use of evidence-based tools and training to enhance the prevention of human trafficking and the identification and protection of victims.



Support Frontline Responders: Increase victim identification by first responders, allied professionals, and victim advocates through targeted training and technical assistance.



Raise Public Awareness: Expand public knowledge of the prevalence and various forms of human trafficking through accessible education and awareness-building efforts.

This initiative represents a significant step forward in Pennsylvania's commitment to a unified, survivor-focused response to human trafficking.

REFERENCES

1. 18 Pa.C.S. § 5902(e).
2. 18 Pa.C.S. § 5902(a).
3. Understanding Human Trafficking, Polaris Project, <https://polarisproject.org/understanding-human-trafficking/> (last visited May 15, 2025).
4. No Such Thing Campaign, Rights4Girls, <https://rights4girls.org/campaign/> (last visited May 15, 2025).
5. News, The Villanova Law Institute to Address Commercial Sexual Exploitation, <https://cseinstitute.org/news/> (last visited May 15, 2025).
6. A LEGAL GUIDE FOR VACATUR MOTIONS IN PENNSYLVANIA, The Villanova Law Institute to Address Commercial Sexual Exploitation, (January 2024), https://cseinstitute.org/wp-content/uploads/2024/01/Legal-Guide_Published01112024.pdf (last visited May 15, 2025).
7. Shea Rhodes, I'm a former assistant DA who works with survivors of sex trafficking - here's why a recent Philly sting marks a shift in how Pennsylvania confronts the commercial sex industry, The Conversation, (December 17, 2024), <https://theconversation.com/im-a-former-assistant-da-who-works-with-survivors-of-sex-trafficking-heres-why-a-recent-philly-sting-marks-a-shift-in-how-pennsylvania-confronts-the-commercial-sex-industry-242674> (last visited May 15, 2025).
8. AG Henry, Pa. State Police Announce Charges Against 22 People in Philadelphia-Based Human Trafficking Organization that Operated for Years, Pennsylvania Attorney General, (October 22, 2024), <https://www.attorneygeneral.gov/taking-action/ag-henry-pa-state-police-announce-charges-against-22-people-in-philadelphia-based-human-trafficking-organization-that-operated-for-years/> (last visited May 15, 2025).
9. See News, The Villanova Law Institute to Address Commercial Sexual Exploitation, <https://cseinstitute.org/news/> (last visited May 15, 2025) (featuring a 1L blog series in April and May 2025 discussing the ways that popular films contribute to a narrative that distorts public understanding of commercial sexual exploitation through sanitization, normalization, glamorization, and sensationalization).
10. Rhodes, *supra* note 7.
11. Shea Rhodes, Why Focusing on Demand for Commercial Sex is an Effective Means to Deter Commercial Sexual Exploitation, The Villanova Law Institute to Address Commercial Sexual Exploitation, <https://cseinstitute.org/wp-content/uploads/2015/06/Why-Focusing-on-Demand-for-Commercial-Sex-is-an-Effective-Means-to-Deter-Commercial-Sexual-Exploitation.pdf> (last visited May 15, 2025).
12. Commercial Sexual Exploitation In Pennsylvania: 2024 Annual Report, The Villanova Law Institute to Address Commercial Sexual Exploitation (2024), https://cseinstitute.org/wp-content/uploads/2024/06/2024-Annual-Report_CSE-In-Pennsylvania_Publish.pdf (last visited May 15, 2025).
13. 18 U.S.C. § 1591 (2022).
14. 18 Pa.C.S. §3011(a).
15. See Artificial Intelligence and 'Gen Ai', WEPROTECT GLOB. ALL., <https://www.weprotect.org/thematic/artificial-intelligence-and-gen-ai/> (last visited May 7, 2025).
16. See *id.*
17. See Artificial Intelligence (AI) and the Production of Child Sexual Abuse Imagery, INTERNET WATCH FOUND., <https://www.iwf.org.uk/about-us/why-we-exist/our-research/how-ai-is-being-abused-to-create-child-sexual-abuse-imagery/> (last visited May 7, 2025).
18. See Child Sexual Abuse Material, U.S. DEPT OF JUST., https://www.justice.gov/d9/2023-06/child_sexual_abuse_material_2.pdf (last visited May 7, 2025).
19. See *id.*
20. Act of Oct. 29, 2024, P.L. 1095, No. 125.
21. See York County Man First in State Charged Under New A.I. Child Pornography Law, WFMZ (April 14, 2025), https://www.wfmz.com/news/area/berks/york-county-man-first-in-state-charged-under-new-a-i-child-pornography-law/article_84247e98-b458-4a42-9e20-4d9d17d641d8.html (last visited May 7, 2025).
22. What is the Equality Model?, Equal Not Exploited, <https://www.equalitymodelus.org/why-the-equality-model/> (last visited May 12, 2025).
23. *Id.*
24. Commercial Sexual Exploitation In Pennsylvania: 2022 Annual Report, The Villanova Law Institute to Address Commercial Sexual Exploitation (2022), <https://cseinstitute.org/wp-content/uploads/2022/06/Final-2022-Annual-Report-pages.pdf> (last visited May 15, 2025).
25. Report on Commercial Sexual Exploitation In Pennsylvania In Pennsylvania, The Villanova Law Institute to Address Commercial Sexual Exploitation (Spring 2021), <https://cseinstitute.org/wp-content/uploads/2021/06/Spring-2021-Report-FINAL-pages.pdf> (last visited May 15, 2025).
26. Commercial Sexual Exploitation In Pennsylvania: 2024 Annual Report, *supra* note 12.
27. *Id.*
28. *Id.*
29. Rebecca Bender et al., Equality Not Exploitation: An Overview of the Global Sex Trade and Trafficking Crisis, and the Case for the Equality Model, Equality Model US (Nov. 2019), <https://www.equalitymodelus.org/wp-content/uploads/2020/02/Equality-Not-Exploitation-white-paper-November-2019.pdf> (last visited May 13, 2025).
30. What is the Equality Model?, *supra* note 22.
31. *Id.*
32. *Id.*
33. *Id.*
34. Commercial Sexual Exploitation In Pennsylvania: 2024 Annual Report, *supra* note 12.
35. Julie Bindel, Germany: Europe's Bordello, UnHerd (Nov. 16, 2022), <https://unherd.com/2022/11/germany-europes-bordello/> (last visited May 13, 2025).
36. 2024 Trafficking in Persons Report: Germany, U.S. Dep't of State, <https://www.state.gov/reports/2024-trafficking-in-persons-report/germany/> (last visited May 13, 2025).
37. Bindel, *supra* note 35.
38. Jonathan Machler, Brief on Human Trafficking of Women, Girls and Gender Diverse People, CAP Int'l (June 2023), <https://www.cap-international.org/wp-content/uploads/2023/06/Canada.pdf> (last visited May 13, 2025).
39. Bender et al., *supra* note 29.
40. Swedish Gender Equality Agency, Prostitution Policy in Sweden - Targeting Demand, https://nspm.jamstalldhetensmyndigheten.se/media/tzsdwtn5/broschyr-sexko-pslagen_a5_ja-my_ny.pdf (last visited May 13, 2025).
41. Machler, *supra* note 38.
42. Nordic Model Now!, FACT: Prostitution Is Inherently Violent, <https://nordicmodelnow.org/facts-about-prostitution/fact-prostitution-is-inherently-violent/> (last visited May 13, 2025).
43. Shea M. Rhodes, Esq., Sex Trafficking and the Hotel Industry: Criminal and Civil Liability for Hotels and their Employees, The Villanova Law Institute to Address Commercial Sexual Exploitation 1, 12-13 (last visited April 10, 2024), https://cseinstitute.org/wp-content/uploads/2015/06/Hotel_Policy_Paper-1.pdf.
44. 18 U.S.C. § 1591.
45. Rhodes, *supra* note 43, at 8.

REFERENCES

46. *Id.* at 9.
47. Philly Motels Will Pay \$17.5M to End Sex Trafficking Claims, Law360 (March 17, 2025), <https://www.law360.com/articles/2311471/philly-motels-will-pay-17-5m-to-end-sex-trafficking-claims> (last visited May 10, 2025).
48. Samantha Kamman, Victims Secure \$17.5M Settlement from Philly Hotels Where They Were Sex Trafficked as Minors, MSN, <https://www.msn.com/en-us/news/crime/victims-secure-17-5m-settlement-from-philly-hotels-where-they-were-sex-trafficked-as-minors/ar-AA1BsfBZ> (last visited May 7, 2025).
49. Philly Motels Will Pay \$17.5M to End Sex Trafficking Claims, *supra* note 47.
50. Hayden Mitman, 3 Northeast Philly Hotels to Pay \$17.5M to Sex Trafficking Victims, NBC Philadelphia, <https://www.nbcphiladelphia.com/news/local/3-northeast-philly-hotels-to-pay-17-5m-to-sex-trafficking-victims/4136353/> (last visited March 17, 2025).
51. H.B. 1286.
52. The Institute to Address Commercial Sexual Exploitation, Four Trafficking Victims Urge the Third Circuit to Reverse Pennsylvania Policy Which Relieves Hotel Insurers From Sex Trafficking Lawsuits, <https://cseinstitute.org/four-trafficking-victims-urge-the-third-circuit-to-reverse-pennsylvania-policy-which-relieves-hotel-insurers-from-sex-trafficking-lawsuits/> (last visited May 15, 2025).
53. Samsung Fire & Marine Ins., Co. v. UFVS Mgmt. Co., LLC, No. 18-04365, 2023 WL 2574971, at *28-30 (E.D. Pa. March 20, 2023).
54. *Id.* at *26-27.
55. *Pet. For Certification of Question of State Law, Samsung Fire & Marine Ins., Co. v. UFVS Mgmt. Co., LLC*, No. 23-1988, 2024 WL 4921644, at *1 (3d Cir. Aug. 12, 2024).
56. Liberty Mut. Fire Ins. Co. v. Red Roof Inns, Inc., No. 23-1692, 2023 WL 7626509, at *14 (E.D. Pa. Nov. 14, 2023).
57. Jennifer Mandato, Increase in Trafficking Reveals Hospitality Coverage Concerns, LAW360 (Jan. 29, 2024), <https://www.law360.com/articles/1790583/increase-in-trafficking-reveals-hospitality-coverage-concerns> (last visited May 10, 2025).
58. *Commonwealth v. Berger*, 417 Pa. Super. 473, 479 (Super. Ct. 1992).
59. Report on Commercial Sexual Exploitation In Pennsylvania In Pennsylvania, *supra* note 25; *Berger*, 417 Pa. Super. at 479 (noting that Cyd “continued to work, as a prostitute, due to beatings administered by [her trafficker] and his threats of further beatings” as well as the concern regarding death threats made by her trafficker).
60. *Berger*, 417 Pa. Super. at 481.
61. *Id.*
62. *Id.* at 475.
63. *Id.*
64. See Sidney McCoy, Fact Sheet: Protecting Trafficking Survivors from Unjust Criminalization, Shared Hope International (June 14, 2022), <https://sharedhope.org/2022/06/14/unjust-criminalization/#:~:text=It%20is%20commonly%20known%20that,similar%20action%20on%20this%20issue>. In a survey conducted by the Polaris Project, data found that ninety percent of trafficking survivors had a criminal record related to their victimization, with over half of the individuals in the study sharing that all of their arrests were related to their exploitation. In Harm’s Way: How Systems Fail Human Trafficking Survivors – Survey Results from the First National Survivor Study, Polaris Project 42, <https://polarisproject.org/wp-content/uploads/2023/07/In-Harms-Way-How-Systems-Fail-Human-Trafficking-Survivors-by-Polaris-modified-June-2023.pdf> (last visited March 12, 2025).
65. See The Use of Forced Criminality: Victims Hidden Behind the Crime, United States Dep’t of State: Office to Monitor and Combat Trafficking in Persons (June 2014), <https://2009-2017.state.gov/documents/organization/233938.pdf> (listing examples of theft, drug crimes, prostitution, and murder as crimes traffickers may force trafficking victims to commit); see also Survivors of Sexual Abuse and Sex Trafficking Criminalized for Self-Defense, Project Censored (May 22, 2023), <https://www.projectcensored.org/6-survivors-of-sexual-abuse-and-sex-trafficking-criminalized-for-self-defense/> (illustrating a scenario where the court criminalized a trafficking victim for self-defense).
66. See Alaina Richert, Failed Interventions: Domestic Violence, Human Trafficking, and the Criminalization of Survival, 120 Mich. L. Rev. 315, 315 (Nov. 2021).
67. See Sarah Devaney, Justice for all? Impeding the Villainization of Human Trafficking Victims Via the Expansion of Vacatur Laws, 49 Pepp. L. Rev. 241, 243 (Jan. 2022).
68. *See id.*
69. See Josephine Ramage, A Second Chance at the Good Life: Vacatur for Human Trafficking Survivors in Nebraska, 14 Neb. L. Rev. Bull. 1, 2 (Jul. 9, 2024).
70. *See id.*
71. *See id.* at 397 (discussing the trafficking cycle and the system’s tendency to treat human trafficking victims as criminals as opposed to what they truly are: victims).



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