

ANNUAL REPORT 2026

**COMMERCIAL SEXUAL EXPLOITATION
IN PENNSYLVANIA**



**VILLANOVA UNIVERSITY
CHARLES WIDGER SCHOOL OF LAW**

**THE INSTITUTE TO ADDRESS
COMMERCIAL SEXUAL EXPLOITATION**

THANK YOU,

FOR READING OUR 2026 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.

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

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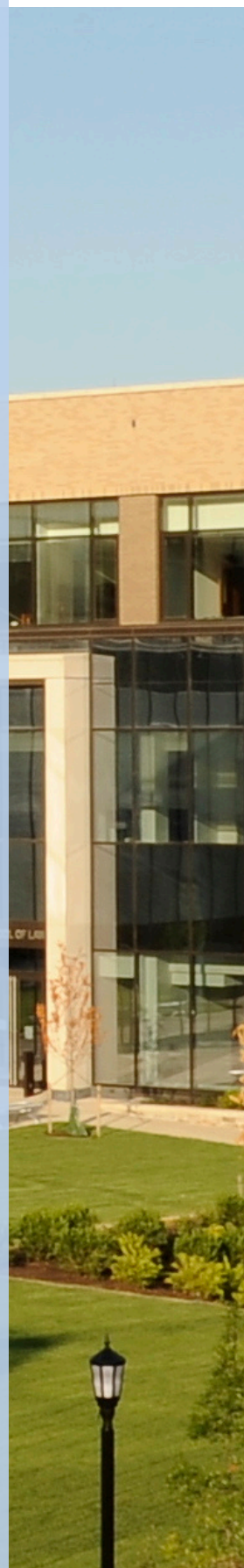


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OUR TEAM



**Spring 2026 Research Assistants, Students Externs
and Pro Bono Externs with Institute Director, Shea**

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.

SHEA M. RHODES, ESQ.



Shea M. Rhodes, Esq., 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 Pennsylvania Commission on Crime and Delinquency (PCCD), Ms. Rhodes chairs the Statewide Human Trafficking Coordination Project. Ms. Rhodes' work at Villanova University Charles Widger School of Law also includes teaching the course Human Trafficking, which seeks to address human trafficking from legal and policy perspectives. This course explores the laws related to the various needs of human trafficking survivors, rhetoric, 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



Michelle Madden Dempsey, the Harold Reuschlein Scholar Chair and Professor of Law, is the Co-Founder and Faculty Advisor of the CSE Institute. At Villanova University Charles Widger School of Law, she teaches Criminal Law, Evidence, and Sexuality and the Law. In Fall 2026, Professor Dempsey will be teaching a course on Critical Perspectives on the Criminal Law in the Master's-level program on Philosophy, Politics, and Law at the University of Bern (Switzerland). Additionally, Professor Dempsey will serve as a Visiting Research Fellow at the Max Planck Institute for the Study of Crime, Security, and Law in Freiburg im Breisgau, Germany, where she will continue pursuing several scholarly projects on consent, sexual offenses, and a philosophical analysis of wrongdoing. An internationally renowned scholar on criminal law philosophy, especially concerning commercial sexual exploitation and violence against women, Professor Dempsey is an elected member of the American Law Institute and a Fellow of the American Bar Association. Professor 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 remains grounded in our focus to enhance our Commonwealth's comprehensive human trafficking statute. Last year's report covered the law's blueprint of **prosecution, prevention, and protection**. Our 2026 report expands upon the three P's to include a fourth - **partnership**. But for the partnership ecosystem, the movement to end sex trafficking and commercial sexual exploitation would remain stagnant.

During the last 12 academic years I have had the pleasure of working with 157 Villanova law students who have collectively spent over 21,000 hours advancing an end to commercial sexual exploitation. Our students engage with survivors, which grounds their education in the real world and ensures they will be trauma-informed lawyers in the future. They use the skills they have learned to advocate for and improve the lives and experiences of survivors through legislative and systemic reforms. I remain in awe of this new generation lawyers and am confident they will change the world for the better.

This year, our focus has been on growing our network of **partners**. Expanding **partnerships** is critical in the anti-exploitation movement; the more we expand, the greater our impact. These **partnerships** include both the news and entertainment media, legal advocates, academics, service providers, law enforcement, and legislators, as well as the unlikely allies in transportation, hospitality, and healthcare sectors. However, those who power the movement are, and will remain, the survivors whose very lives have been impacted. **Partnering** with survivors, who have lived experiences of exploitation by sex buyers and traffickers, is critical to effecting change. When the very systems that should help survivors are instead hurting them, the laws and systems causing harm must be torn down and rebuilt from scratch.

Changing laws and systems by recognizing that the status quo is harmful takes courage. The courage that survivors consistently bring to the table is simultaneously humbling and inspiring. It is critical that those in positions of power in our Commonwealth recognize that they must **partner** with survivors throughout every step of the legislative process, not merely as an afterthought or to rubber stamp an agenda created without their input. As I have said before, it is imperative that our Commonwealth garner the political will to ensure our laws do the right thing for the right reasons, which is to ensure the lives of victims and survivors are made meaningfully better.

On behalf of the CSE Institute, I thank you for reading our 2026 Annual Report on commercial sexual exploitation in Pennsylvania. 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 within our communities. It is my sincere wish that you will be inspired to join us in the movement to end commercial sexual exploitation. There is no time like the present to **partner** with us!

Thank you,

A handwritten signature in black ink that reads "Shea". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

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.



"I joined the Institute to learn research and writing skills from expert faculty and colleagues. I've enjoyed working alongside Shea and Institute colleagues in advocating for an end to human trafficking."

Noah Ryan '26

"I joined the Institute because I was drawn to its efforts to address CSE and trafficking. I was excited to return this semester as an extern and contribute more meaningfully to the Institute's ongoing work!"

Amisha Mirchandani '27



"The impact of the work and the sense of community created in the Institute is why I chose to come back as a 2L extern, and I hope to continue this work both in and out of law school."

Camryn Williams-Babu '27

GOALS OF THE PROGRAM

Customized Experience

Learn the Law

Strengthen Legal Skills

Understand the Issue

Gain Real World Experience

Build a Legal Network



21K+

HOURS WORKED

157

STUDENT EXTERNS

3

**ANTI-TRAFFICKING
BILLS PASSED**

27

**BILLS PENDING IN
PENNSYLVANIA**

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 12 years, we report the following:

- 450 training sessions held throughout the Commonwealth and nationally
- 2,500 individuals trained through our “Enhanced Collaborative to Combat Human Trafficking” Training
- 250+ agencies and individuals who have received technical assistance from the CSE Institute

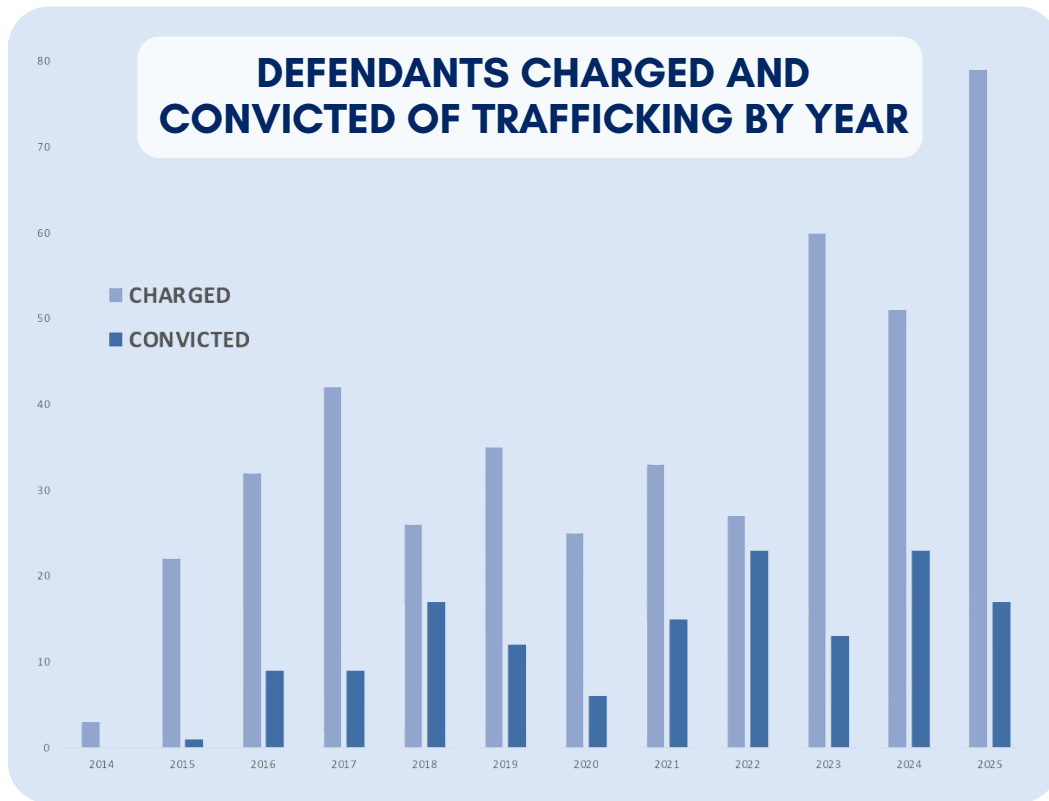
2025 Pennsylvania Trafficking Charge Statistics

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.

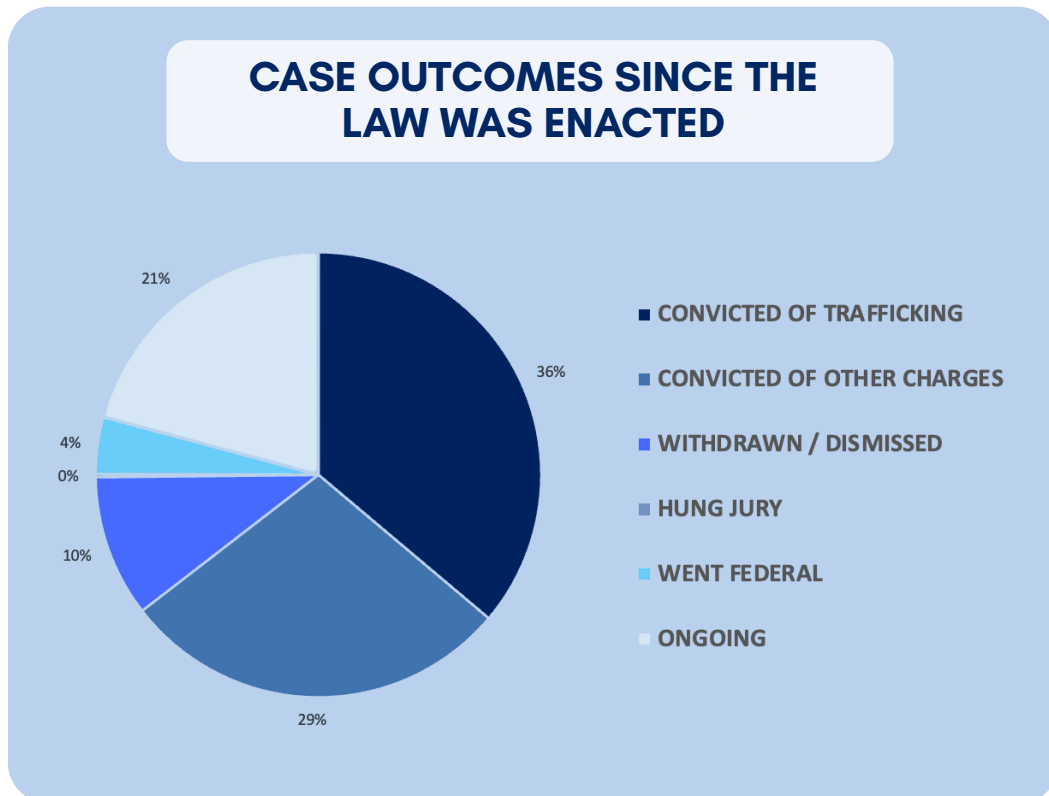
In 2025, **26 counties** charged a trafficking related case against a total of **79 defendants**.

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 2025, prosecutors in **45 counties** have used the law to charge trafficking related offenses against **435 defendants**.





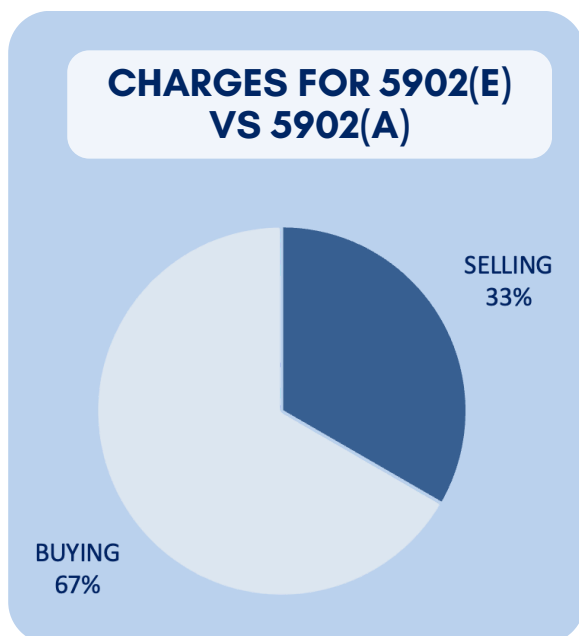
Of the 435 defendants charged with human trafficking since the law was enacted in 2014, **158 were convicted** of a trafficking-related offense.



2025 Pennsylvania Prostitution Charge Statistics

The CSE Institute has been tracking prostitution-related charges since our inception. In 2025, for the **fifth 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. In 2025, these data were largely driven by four counties: Erie, Cumberland, Delaware, and Philadelphia. These four counties account for **65% of total arrests for sex buying**. On the other hand, **12 of the 24 counties** who charged any prostitution-related offense in 2025 arrested more individuals for selling sex than for buying sex.



COUNTY	SELLING	BUYING
Allegheny	27	11
Beaver	5	2
Berks	2	9
Blair	2	0
Bucks	4	5
Butler	0	1
Clinton	1	0
Cumberland	3	43
Dauphin	8	7
Delaware	1	27
Erie	3	52
Lackawanna	12	17
Lancaster	17	19
Lebanon	4	0
Lehigh	0	3
Montgomery	1	0
Northhampton	2	1
Northumberland	1	0
Philadelphia	1	20
Venango	1	2
Washington	3	0
Westmoreland	5	0
Wyoming	3	1
York	4	0
Total:	110	220



THE PARTNERSHIP ECOSYSTEM:

WHO POWERS THE MOVEMENT

THE SURVIVOR COMMUNITY

Survivors stand at the forefront of every effort to combat commercial sexual exploitation.

Survivor leaders bring critical expertise, lived experience, and insight that strengthen prevention, protection, and accountability efforts across every sector. Their voices challenge harmful misconceptions about the realities of exploitation and ensure that policies, trainings, public education campaigns, and legislative initiatives are grounded in the experiences of those most directly impacted. Survivor-informed partnerships foster more effective, compassionate, and sustainable responses to exploitation.

At the CSE Institute, we believe all anti-trafficking work must be survivor-centered and survivor-informed. Survivors are the ultimate experts of their own experiences, and their leadership helps shape a deeper public understanding of coercion, trauma, and systemic vulnerability. In a culture that often glamorizes commercial sex while obscuring the realities of exploitation, survivor testimony is essential to correcting misinformation and amplifying truth. Meaningful partnerships begin by listening to, valuing, and elevating survivor voices.

NEWS MEDIA

News media are extremely powerful tools of influence and shape public understanding of commercial sexual exploitation. The language journalists choose can either clarify the realities of exploitation or reinforce harmful misconceptions [3]. Terms such as “underage women,” “child prostitutes,” or “sex work,” are not only incorrect, but also obscure the coercion, abuse, and exploitation inherent in trafficking situations [4]. Effective collaboration with journalists is essential to ensure that instances of commercial sexual exploitation are reported accurately and center on the experiences of survivors.

The CSE Institute encourages the media to use language intentionally, scrutinize lawmakers and law enforcement when appropriate, and clearly depict the role of sex buyers and traffickers as perpetrators of harm. Responsible reporting can minimize the vilification and autonomy that is wrongly imposed onto people in the sex trade by accurately framing instances of exploitation and abuse. The news media can also strengthen accountability and encourage broader engagement in efforts to eliminate the sex trade by highlighting emerging trends and identifying gaps in enforcement. Through intentional storytelling and accurate framing, news media can become a critical partner in advancing prevention and justice.

ENTERTAINMENT MEDIA

Entertainment media—including films, television, and social media—play a significant role in shaping public understanding, influencing cultural norms, and mobilizing action against sex-trafficking and commercial sexual exploitation [5]. The stories and character portrayals presented on the screen often become embedded in public consciousness. These narratives influence how communities perceive victims and survivors, how policymakers prioritize responses, and how society defines both the problem and its solutions.

The CSE Institute encourages responsible and survivor-centered storytelling in entertainment media by presenting accurate representations of the authentic lived experiences of survivors. Partnerships with entertainment media can reshape dominant cultural narratives, shifting the conversation away from sensationalism and toward a deeper understanding of trauma, coercion, and the systemic forces that enable exploitation. Unlike statistics alone, narrative storytelling humanizes those impacted, illuminating structural vulnerabilities and fostering empathy. This perspective helps reduce stigma and harmful assumptions and build stronger public support for survivor-centered policies and prevention strategies.

LEGAL ADVOCATES

Legal professionals are essential partners for change. For prosecutors, this requires the understanding of the harm that commercial sexual exploitation wreaks in our communities. The CSE Institute strongly advocates against the arrest of people in prostitution and encourages prosecutors to target those who create the market demand for commercial sexual exploitation: traffickers, brothel owners and sex buyers [6]. But further than this, prosecutors and public defenders must both recognize that additional crimes committed by people in prostitution may be perpetrated through forced criminality and directly related to trafficking victimization [7]. Public defenders must be instructed on the signs of exploitation and trafficking and if ethically permitted by their clients, refer the case to law enforcement or prosecutors to investigate.

Pro bono legal partners, who dedicate their time and attention to researching pending legislation, assisting in client representation, and so much more, also play a crucial role. As do members of the plaintiffs' bar, who fight to vindicate the rights of survivors of sexual exploitation through civil litigation. Sexual exploitation is not just a criminal justice issue. Civil suits are a powerful tool to compensate survivors for the harm their abusers caused. Monetary damages, though never enough to undo the harm suffered, can help survivors reintegrate into society. Financial insecurity often leads survivors into the hands of their exploiters in the first place. The plaintiffs' bar stands as a powerful bulwark against this.



ACADEMIA



Academic institutions play an important role in advancing research, education, and evidence-based responses to commercial sexual exploitation. Educational institutions can develop rigorous academic research and reviews to provide critical insight into the negative social and health outcomes of victims, risk factors for trafficking, identification and intervention strategies, and common characteristics of trafficking. This research provides critical insight into the systemic conditions that enable exploitation and informs policies and practices across multiple sectors.

Academia also serves as a bridge between disciplines such as law, psychology, public health, nursing, and social work, fostering collaboration and identifying gaps in existing knowledge. Rigorous research can strengthen prevention efforts, improve survivor identification, and evaluate the effectiveness of legislative and institutional responses. By continuing to examine evolving trends and systemic challenges, academic institutions help ensure that anti-trafficking efforts remain informed, responsive, and grounded in evidence.



SERVICE PROVIDERS

Service providers—including healthcare professionals, social workers, housing organizations, counselors, and community-based advocates—are indispensable partners in advancing the core pillars of prosecution, prevention, and protection in the fight against commercial sexual exploitation. Medical providers, in particular, play a frontline role by identifying signs of trafficking, delivering trauma-informed care, and documenting injuries that may support legal proceedings [8]. Through screenings, confidential reporting, and coordinated referrals, healthcare professionals can intervene early, connecting victims with essential resources while preserving their dignity and autonomy.

Beyond the medical field, service providers can provide comprehensive, trauma-informed support that is essential for both immediate safety and long-term recovery. This includes crisis intervention, safe housing, legal advocacy, counseling, substance use treatment, job training, and case management. By fostering trust and stability, service providers empower survivors to rebuild their lives and, when appropriate, participate in the justice process. Their collaboration with law enforcement, legal advocates, and policymakers ensures that responses to commercial sexual exploitation are informed by lived experience and grounded in trauma-informed, culturally competent practices [9]. Ultimately, service providers are not only responders – they are key agents of prevention, working within communities to address root causes, raise awareness, and reduce vulnerability to exploitation.

LAW ENFORCEMENT

As investigators of crime, and oftentimes as the first point of contact with victims, traffickers, and sex buyers, law enforcement are critical partners in efforts to address commercial sexual exploitation. However, research shows that many agencies and departments, particularly at the state and local levels, still struggle to recognize the signs of trafficking, thereby hindering enforcement efforts and denying survivors full protection under the law [10]. These challenges underscore the need for expanded training, institutional prioritization, and improved resource allocation within agencies and departments, as well as the importance of establishing stronger partnerships both within the profession and across sectors.

Accordingly, the CSE Institute calls on law enforcement agencies across all levels—including local, state, federal, and even international—to engage in cross-sector collaboration with other law enforcement agencies and departments, government entities, nonprofit organizations, and businesses alike. Building these relationships and partnerships promotes ongoing communication, intelligence sharing, and joint investigative efforts, all of which are necessary to combat commercial sexual exploitation because such complex crimes cannot be fully or adequately addressed by any single institution acting alone.

LEGISLATORS

Legislators play a central role in shaping survivor-centered responses to commercial sexual exploitation. Through legislation and funding priorities, policymakers can strengthen prevention efforts, expand survivor services, and ensure that individuals in the sex trade are not criminalized for their exploitation. Laws that hold traffickers, exploiters, and sex buyers accountable while protecting survivors are essential to creating long-term systemic change at every level of government.

The CSE Institute supports legislative frameworks developed by listening to survivors of commercial sexual exploitation such as the Equality Model, which decriminalizes individuals selling sex while targeting the demand that drives exploitation [11]. In 2023, Maine became the first U.S. state to implement this approach, recognizing prostitution as a form of gender-based violence and expanding access to survivor services [12]. Equality Model legislation has also been introduced in Illinois, New York and Massachusetts. The CSE Institute also supports second-look and post-conviction relief legislation, including the federal Trafficking Survivors Relief Act (TSRA) [13]. Signed into law this year, the TSRA establishes an affirmative defense for individuals charged with federal crimes directly stemming from trafficking victimization and provides post-conviction relief for survivors that have already been convicted, including vacatur, expungement, and sentencing mitigation [14].

UNLIKELY ALLIES

The movement against commercial sexual exploitation grows stronger when partnerships extend beyond traditional anti-trafficking spaces. Industries such as transportation, hospitality, and health care are often on the front lines of sex trafficking, allowing them to become allies in both preventing and disrupting sex trafficking and commercial sexual exploitation. Workers in these industries may interact with victims, traffickers, or sex buyers in their routine operations, placing them in a critical position to recognize warning signs and intervene before harm escalates.

The hospitality industry demonstrates the importance of these partnerships. Hotels and motels are among the most common venues for sex trafficking and commercial sexual exploitation in the United States, and many survivors report coming into contact with a hotel or motel during their exploitation [15]. These statistics highlight the importance of implementing industry-wide trainings, policies, and procedures. When frontline workers are equipped with the tools necessary to identify warning signs and take appropriate action, they become key allies in the fight against commercial sexual exploitation.

By engaging unlikely allies across industries, communities can move from reactive responses toward proactive prevention and protection efforts.



PARTNERSHIPS IN ACTION:

**FROM COLLABORATION
TO TRANSFORMATION**

PROTECTION



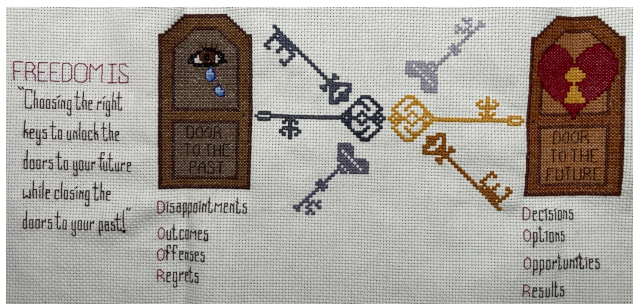
SURVIVOR SPOTLIGHT: CYD BERGER

As awareness surrounding the criminalization of survivors has grown, partnerships between survivors, legal advocates, nonprofit organizations, researchers, and lawmakers have become increasingly important in advancing reform efforts and creating pathways for protection. Cyd Berger's story has become part of a broader movement advocating for trauma-informed responses for survivors criminalized as a result of their exploitation.

At twenty-five years old, Cyd Berger was coerced by her trafficker into helping dispose of the body of a sex buyer he had murdered [16]. For years, Cyd experienced severe abuse, including physical violence, threats against her family, the kidnapping of her son, and coercion into prostitution to support her trafficker's drug addiction. In 1980, while Cyd was in another room, her trafficker committed murder and then forced her to assist in moving and disposing of the body. Following continued abuse, Cyd eventually turned herself in and cooperated with law enforcement in the arrest of her trafficker.

Despite her cooperation and the coercion surrounding her involvement, Cyd was convicted of first-degree murder, robbery, credit card theft and conspiracy in addition to pleading guilty to theft by unlawful taking and conspiracy. She was sentenced to mandatory life in prison without the possibility of parole. The years of abuse, manipulation, and trafficking she endured were never meaningfully considered by the court, and the system viewed her only as an offender rather than as a survivor of profound trauma.

Cyd's experience highlights the victim-offender overlap often present in trafficking cases. Survivors are frequently coerced or manipulated into criminal activity by their traffickers, including offenses committed under fear, abuse, or direct coercion [17]. Although the criminal justice system is intended to protect victims, survivors like Cyd are too often criminalized for actions directly connected to their exploitation [18].



Doors of Freedom by Cyd Berger

Portrait of Cyd Berger by Mary DeWitt



SURVIVOR SPOTLIGHT: CYD BERGER

Federal second-look legislation is important to ensure survivors are not denied relief due to varying state laws in the geographic location of their arrest or conviction. In 2019, Polaris, a leading nonprofit organization, published a state-by-state assessment of post-conviction relief for survivors [19]. Developed in collaboration with criminalized survivors and leading researchers, the report grades state law based on numerous factors. The goal for the report was to guide policymakers and advocates to enact laws that best support criminalized human trafficking survivors.

The Justice in Sentencing for Survivors Act of 2025 is a federal bill that proposes to include an aspect of resentencing not yet included in second-look laws [20]. This bill would allow a court to “impose a sentence that is below the minimum sentence established by statute in consideration of any sexual assault, stalking, dating violence, domestic violence, or severe forms of trafficking in persons experienced by the victim-offender” [21]. This bill addresses a major gap in current sentencing law by offering a more trauma-informed approach and lowering the evidentiary burden on victim-offenders seeking relief. Although the bill has not yet advanced in Congress, it signals growing awareness of how mandatory minimums disproportionately harm trafficking survivors, like Cyd. If enacted, it would mark a significant federal step toward justice for criminalized survivors.

Today, Pennsylvania law still does not provide meaningful post-conviction relief for survivors in situations like Cyd’s. In addition to broader legislative advocacy, the CSE Institute has continued working directly with Cyd in support of her commutation efforts. Through partnerships with survivor advocates, attorneys, researchers, and community members, the Institute has assisted in preparing materials related to her application while continuing to advocate for trauma-informed protections for criminalized survivors. These collaborative efforts reflect the importance of survivor-centered partnerships in advancing pathways toward justice and healing.

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

A SECOND LOOK AT “BEYOND SURVIVAL”

On February 25, 2026, the CSE Institute, David F. and Constance B. Girard-diCarlo Center for Ethics, Integrity and Compliance, Drexel University College of Arts and Sciences Center for Public Policy, Drexel University Thomas R. Kline School of Law Justice Collaborative, and Survivors Justice Project partnered to present a screening of the documentary “Beyond Survival” followed by a conversation with Kate Mogulescu and Judy Clark, directors of the Survivors Justice Project. Beyond Survival tells the story of New York’s Domestic Violence Survivors Justice Act (DVSJA), a sentencing mitigation law that expands protections for survivors of domestic violence [22].

The DVSJA allows judges to depart from mandatory minimums when sentencing survivors of domestic violence for offenses related to their abuse and re-sentence survivors who were sentenced prior to the law’s enactment. This is a crucial step toward mitigating the re-traumatization that survivors experience through coercive tactics and environments within the criminal justice system. The DVSJA resentencing process restores hope and jumpstarts the healing process for survivors of domestic violence. Since the adoption of the DVSJA, 82 survivors have been resentenced, preventing 240 needless years of imprisonment and eliminating 20 potential life sentences [23].

The Beyond Survival Screening highlighted a successful collaboration between the legal community, lawmakers, and media to leverage legislative change for the protection of survivors. The event raised awareness of sentencing considerations for survivors of gender-based violence and fostered important conversations about the DVSJA and how it could be adapted into a sentencing mitigation statute for Pennsylvania. The DVSJA provided a necessary remedy for survivors who are criminalized as a result of conduct directly stemming from domestic violence, and the CSE Institute advocates for similar protections for survivors of gender-based violence in Pennsylvania.

Getting the DVSJA adopted was a collaborative effort by survivors and legal advocates, particularly the Coalition for Women Prisoners and the Survivors Justice Project. Kate Mogulescu and Judy Clark were featured panelists at the Beyond Survival Screening. According to Kate, partnership with survivors on the DVSJA was critical to ensure survivors were not only centered, but taken care of. Building the DVSJA required consideration of what a survivor might need in seeking sentencing mitigation or resentencing. Thus, it was imperative that the team working to get the DVSJA adopted was more than a roomful of lawyers and actively included those who needed the relief.

A SECOND LOOK AT “BEYOND SURVIVAL”

Judy and Kate’s sentiments on the importance of community and partnership in survivor advocacy were reflected by others in attendance at the Beyond Survival Screening. Dan Walworth, a Partner at Duane Morris, highlighted his collaboration with survivor advocacy organizations on pro bono cases as leading to some of the most impactful and proudest moments in his career. Emily Marks, a Partner at Kline & Specter, emphasized the importance of local organizations, including Women Against Abuse and the Salvation Army’s New Day to Stop Trafficking program, in providing support for her survivor clients. Because her clients aren’t formally recognized as victims in their civil litigation proceedings and lack formal victim services, partnerships are essential for connecting clients with therapeutic and medical services on an expedited basis.

The Beyond Survival Screening fostered partnership by bringing survivor advocates and members of the legal community—including judges, prosecutors, attorneys, and professors—together to discuss the expansion of legal protections for survivors. Attendees heard from Kate and Judy about their first-hand experience working to get the DVSJA adopted through 10 years of organizing and collaboration. Kate highlighted the importance of early collaboration between survivors, prosecutors, defense attorneys, judges, advocates, and lawmakers to get a law like the DVSJA passed. The CSE Institute hopes the Beyond Survival Screening fostered this early collaboration and jumpstarted the process for expanding sentencing mitigation protections for survivors in Pennsylvania.

Partnership is essential for expanding protections for survivors, but oftentimes it is just as valuable as the protections themselves. Judy reflected on this while discussing the 10-year process of getting the DVSJA adopted, emphasizing that survivors and advocates ended up not just with a law, but with a community as well. The Beyond Survival Screening showcased the importance of partnership in expanding protections for survivors, and the CSE Institute is proud to have been a part of this community-building educational event.



Beyond Survival Screening Panel, from left to right: Judy Clark, Kate Mogulescu, and Shea Rhodes

PROSECUTION



SURVIVOR SPOTLIGHT: LIZ STEIN

Elizabeth (Liz) Stein is a human trafficking specialist, survivor advocate, and one of the leading voices calling for transparency and accountability in the release of the Epstein files.

In the summer of 2025, when Jeffrey Epstein's network of abuse became a "hot topic" in American discourse, Liz Stein began asking how she could use her platform to make an impact and educate people on the gravity of the issue. Liz's role in this effort was particularly powerful not only as an Epstein survivor, but as a seasoned anti-trafficking advocate who had relationships with organizations that could collaborate. One of those organizations was World Without Exploitation (WorldWE*), the nation's largest coalition against human trafficking and sexual exploitation. Working in partnership, Liz and WorldWE organized a rally on Capitol Hill in September to bring together Epstein survivors, many of whom spoke publicly for the first time. When speaking amongst themselves, the survivors at the rally decided to use their stories to make an impact both culturally and legislatively. The collaboration between Liz, WorldWE, and other Epstein survivors helped ignite a broader cultural movement that demanded transparency from the Department of Justice and accountability of the powerful individuals who enabled and participated in Epstein's exploitation. The result? The Epstein Files Transparency Act was introduced that same month and signed into law two months later [24].

Liz said she did not initially believe the effort would lead to a legislative victory, but it turned out to be a prime example of the power of a partnership that was authentically survivor centered. She further emphasized that when survivors, allies or organizations work in silos, it can be easy to forget the power of bringing people together to gain insight from different perspectives. One nonnegotiable element of that collaboration is survivor input. However, bringing survivors to the table cannot be about tokenizing survivors, but instead must recognize survivors as full partners in a collaboration.

"People need to understand that we are more than just survivors – we are individuals with unique strengths and talents to contribute."

For Liz, it is important for partners in the anti-exploitation movement to recognize that survivors are so much more than their stories. Survivors often develop skills through survival that translate directly into leadership, advocacy, and professional expertise. They should be brought to the table to contribute more than just their stories of trauma.

*CSE Institute Director, Shea Rhodes, is a founding steering committee member of World WE.

SURVIVOR SPOTLIGHT: LIZ STEIN

However, meaningful survivor engagement also requires understanding the barriers survivors face in participating at all. For the first time, we are seeing the media interact with survivors at a rate we have not seen before because of the Epstein case. Survivors are asked invasive questions, expected to give hours of their time, and often required to cover their own travel expenses, but they are often the only people in the room not being paid. In her own words, this is a blindness within society as to what a survivor's experience is. Instead, she encourages journalists and other partners in the movement to consider the barriers survivors face in engaging with the movement.

“Professionals need to understand that we may have circumstances that are different from other people who are participating at these tables and sometimes a reasonable accommodation for our participation is necessary and worth it.”

For Liz, being at the Ghislaine Maxwell trial motivated her advocacy against human trafficking and commercial sexual exploitation. However, she recognizes that not every survivor chooses to be an advocate.

For this reason, when collaborating with survivors, it is also important to recognize that fully understanding the complexity and nuanced nature of exploitation does not happen overnight. Partners and organizations can support survivors in their healing by helping contextualize their abuse as a systemic failure rooted in human trafficking and exploitation, rather than as a personal failure.

While meaningful partnerships advanced the Epstein Files Transparency Act, not all collaborations were a success. The complexity of human trafficking also allowed the issue to become entangled in political polarization. Specifically, Liz spoke about the countless meetings she had with lawmakers who supported survivors behind closed doors but remained silent when public support was required. In a crime with over 1,000 victims, there is no space for partisan politics.

However, the largest disappointment came from the Department of Justice's lack of collaboration with survivors. Beyond the careless release of the Epstein files with no context, the exposure of victims' identifying information, and unwillingness to meet with survivors, Liz fears for how the Department of Justice's response will impact how survivors across the country view law enforcement going forward.

SURVIVOR SPOTLIGHT: LIZ STEIN

“What is more concerning for me, is what this is telling not just survivors but any victim of a crime about coming forward and reporting to the FBI, how they will be treated, and how their experience will be handled.”

Still, Liz expressed gratitude for the cultural moment that emerged from the collaboration between survivors and anti-trafficking organizations, one that helped reshape public understanding of sex trafficking and exploitation. While the fight for transparency and accountability is far from over, she believes this movement has already demonstrated the power of survivor-led advocacy to challenge longstanding misconceptions, elevate survivor voices, and push institutions to respond to exploitation with greater urgency and responsibility.



Liz Stein speaking at the Stand with Survivors Rally on Capitol Hill

EPSTEIN FILES TRANSPARENCY ACT

For years, before any documents related to Jeffrey Epstein’s network of abuse were made public, human trafficking advocacy organizations and women’s rights groups played a foundational role in keeping sustained pressure on the government to release the Epstein files.

The National Organization for Women contacted members of Congress to demand the passage of the Epstein Files Transparency Act (EFTA) and organized petition drives calling on Congress and the Department of Justice (DOJ) to release all related documents. Additionally, World Without Exploitation (WorldWE) platformed Epstein survivors and amplified their voices while demanding the release of all Epstein files through powerful ad campaigns to keep public attention focused on the issue [25]. By partnering with Epstein survivors, WorldWE framed the push for transparency as a part of the broader fight for survivors of sexual exploitation who were ignored for decades.

That important advocacy was built on the infrastructure of survivor-centered work done by organizations like Freedom Network USA and Polaris, who have spent years working towards the kind of accountability that the EFTA seeks to deliver. These non-profits have fought harmful policies and advocated for—and alongside—survivors, often providing recommendations to the DOJ and Health and Human Services [26].

Nonprofits like WorldWE have also been essential to maintaining public attention, particularly when legislation moves slowly or stalls somewhere in the process of passage. The push to pass the EFTA demonstrates the power of an essential partnership between survivors, nonprofits, and lawmakers. Together, these groups created something that may have never been possible alone: a bipartisan, legislative provision that has forced some accountability onto powerful individuals and institutions. This partnership did not simply pass legislation; it fundamentally reframed the public conversation regarding accountability of the powerful and the rights of survivors to see justice.

That pressure from lawmakers working side by side with survivors, WorldWE, and independent journalists ultimately produced the EFTA in November 2025, leading to the release of millions of pages of documents by the DOJ. However, this partnership is far from done. Advocacy groups and legislators alike have noted that the documents released to date were far too redacted and continue to push for greater transparency. In this way, this essential partnership has played many roles throughout the timeline of this effort. Not only was this partnership instrumental in making the release happen, but it also has become the watchdog holding the government accountable for how it executed the release of the files, advocating for both public accountability and the safety of the survivors who seek justice.

PREVENTION



HB 1286: PARTNERS IN PREVENTION

Human trafficking prevention cannot happen in a vacuum; it relies on the coordination of various partnerships. Law enforcement officers, lawmakers, support service providers, and policy advocates must work together to create and enforce laws aimed at prevention. To that end, unlikely allies are essential partners in combatting trafficking because of the direct contact many allies have with potential victims. According to a survey conducted by the Polaris Project, over a ten-year period beginning in 2007, 75% of survivors indicated they came into contact with hotels at some point during the trafficking they experienced [27]. Employees in the hospitality industry are therefore uniquely situated to identify potential victims and notify law enforcement.

In April 2025, State Representative Regina Young introduced House Bill 1286, which amends the National Human Trafficking Resource Center Hotline Notification Act [28]. This amendment makes human trafficking training mandatory for public lodgings. The requirement would apply to owners, managers, employees, and third party contract workers of public lodging establishments and short-term rentals. Trainings must include legal definitions of human trafficking, labor trafficking, and commercial exploitation of minors, guidance to identify at-risk individuals and signs of trafficking activity, and a notification system with contact information for Pennsylvania State Police.

Trainings must also be approved by Pennsylvania Commission on Crime and Delinquency (PCCD) and failure to complete adequate training and subsequent re-training every two years will result in fines up to \$500 or suspension of the establishment's operating license. Record of completion must be available to licensing agencies, law enforcement entities, and in the case of short term rentals, held by the third party listing platform. At least 50% of the revenue generated from such fines will be distributed to PCCD for grants supporting survivors and related exit services.

On October 2, 2025, organizations such as the Pennsylvania Restaurant and Lodging Association (PRLA), American Hotel and Lodging Association (AHLA), Human Trafficking Section of the Pennsylvania Office of the Attorney General, Zoe International, PCCD, and CSE Institute testified before the Pennsylvania House Tourism, Recreation, Economic Development Committee in support of HB 1286.



Shea Rhodes testifying in support of HB 1286

HB 1286: PARTNERS IN PREVENTION

Shea Rhodes began her testimony by walking through previous annual reports of the Institute, all of which held stories of trafficking taking place inside public lodging establishments. Beginning with the first annual report, Rhodes discussed East Exit Motel, Sheraton Station, Holiday Inn, Courtyard Marriot, and Day's Inn, all common trafficking hotspots in 2015 [29]. With every subsequent annual report mentioned, Rhodes stressed, "These are very clear examples of how hotels can be our allies in this fight. They need to be our allies in this fight."

While every trafficking case is different, AHLA created the "No Room for Trafficking" Initiative to provide employees with signs to identify potential trafficking victims and encourage employers to develop a notification system to bring in law enforcement officers to investigate. During testimony, President of PLRA, Joe Massaro, explained that following the completion of the AHLA training, employees were 80% more likely to identify and report signs of trafficking. Consequently, with the rise of vigilance related to trafficking in hotels, traffickers have begun to shift operations to more isolated rental opportunities through Airbnb and VRBOs. Since these rentals are typically run by individual owners and do not require contact with anyone at check-in, they have become desirable alternatives for both traffickers and sex buyers weary of law enforcement sting operations or potential exposure.

While new Airbnb policies require ID verification for all guests on the booking over the age of eighteen, traffickers could circumvent this step by not reporting additional guests or only listing minors on the booking. But with the training required by HB 1286, short term rental owners would be equipped with other mechanisms to ensure the safety of any guest on their property.

The importance of this training cannot be overstated; as Pennsylvania heads into 2026, many major events such as the NCAA March Madness tournament the PGA Tour Championship, the MLB All Star Game, the FIFA World Cup, and the 250th Anniversary of the founding of the United States will bring an increase in tourism which could subsequently cause an increase in trafficking activity [30].

The passage of HB 1286 would mark a major milestone as a step toward prevention. As of the time of this publication, the bill was introduced to the State Senate and is currently under review for amendment. The CSE Institute strongly supports House Bill 1286 and the creation of mandatory training for public lodging establishments but also advocates for the continual partnership of the hospitality industry in combatting the harm of the commercial sex trade. In discussing the benefits of this legislation, Director Rhodes reminded the committee, "this legislation is a no brainer and I hope that it is just a start."

FULL 4P

PREVENTION

PARTNERSHIP

PROTECTION

PROSECUTION

PARADIGM

CSE INSTITUTE AND PCCD PARTNERSHIP

The CSE Institute is proud to partner with Pennsylvania Commission on Crime and Delinquency (PCCD) to develop a comprehensive, public-facing website dedicated to coordinating anti-trafficking resources across the Commonwealth. Launched in January 2026, the “Pennsylvania Human Trafficking Resource and Coordination Project” is designed to strengthen Pennsylvania’s statewide response to human trafficking by establishing a centralized hub of information, training materials, and resources for survivors, first responders, direct service providers, and the public [31].

Through the CSE Institute’s partnership with PCCD, academic researchers, and advocates working in the field, the project unites expertise from government agencies, academia, and frontline victim service providers. By leveraging these combined perspectives, the team was able to develop a platform designed to meet the needs of professionals and communities across the Commonwealth. As part of this effort, the team worked to consolidate organizations and resources from across all of Pennsylvania’s 67 counties, contributing knowledge, training materials, and trauma-informed resources to help communities combat human trafficking.

Through this coordinated partnership, the platform now serves as a trusted and readily accessible space where individuals, service providers, and anti-trafficking organizations can locate information, share resources, and strengthen collective efforts to prevent exploitation and support survivors.

Pennsylvania Human Trafficking Resource & Coordination Project

Trusted, trauma-informed resources and training for first responders, service providers, and the public. We work with state agencies and partners to strengthen prevention, improve response, and support survivors across Pennsylvania.

About the Project →

What is Human Trafficking? →



PCCD website: <https://www.pa.gov/agencies/pccd/programs-and-services/human-trafficking-in-pa>

WHAT'S NEXT:

SCALING IMPACT THROUGH PARTNERSHIP

PROTECTION of Victims and Survivors

POLICY RECOMMENDATION:

Provide meaningful protections for victims and survivors by expanding vacatur and affirmative defense remedies in § 3019.

Criminal convictions carry many negative side effects for survivors of human trafficking, including re-traumatization and restriction of resources. Thus, vacatur and affirmative defense remedies are crucial for the protection of trafficking survivors. While Pennsylvania law contains vacatur and affirmative defense remedies, further legislation is necessary for the expansion of these remedies.

18 PA Cons Stat § 3019(d) currently limits survivors' ability to petition a court to vacate convictions for six crimes: criminal trespass, disorderly conduct, loitering and prowling at nighttime, obstructing highways and other public passages, prostitution, or an offense for simple possession of a controlled substance [32]. However, § 3019(d) must be expanded to include other crimes survivors may have committed while under the control of their trafficker or as a result of their exploitation. Without these added protections, trafficking survivors are criminalized for crimes they committed as a direct result of being a victim. Pennsylvania's laws should take into account that trauma is the unique, subjective, individual experience and should not punish survivors for crimes over which they had little or no agency.

18 PA Cons Stat § 3019(b) currently limits an affirmative defense to allegations of prostitution under § 5902 [33]. However, § 3019(b) must also be expanded to allow victims of trafficking to raise an affirmative defense for any crime that may be alleged that is related to their trafficking victimization. An expansion of affirmative defenses for survivors would not deny that these acts occurred, but would codify that survivors have a recognized legal justification if successful.

Partnership is essential to accomplish these goals. Bipartisan policymakers must collaborate to pass H.B. 753, which amends § 3019 [34]. The Pennsylvania District Attorney's Association must also provide support and trainings for prosecutors and law enforcement on how to effectively guide criminalized survivors through the vacatur process. Additionally, public defender, legal aid, and expungement clinics across the state can and should remove any income cut-off requirements when assisting with criminalized survivors' vacatur requests. Lastly, the Administrative Offices of Pennsylvania must streamline its e-filing policy to allow users to save their work and resume later. Currently, users must complete an e-filing in one sitting, which can be disproportionately distressing for criminalized survivors who may re-live their trauma during the e-filing process.

PROSECUTION of Human Traffickers

POLICY RECOMMENDATION:

Strengthen the prosecution of sex buyers, facilitators and traffickers by simplifying Chapter 30 of the crimes code.

Strengthening the prosecution of sex buyers, facilitators, and traffickers requires a comprehensive approach that addresses the entire system driving sexual exploitation. Rather than allowing sex buyers, facilitators, and traffickers to escape accountability, prosecutors must ensure legal consequences are directed squarely at those who profit from and perpetuate exploitation instead of disproportionately penalizing victims.

Pennsylvania's statutes governing human trafficking offenses, penalties, and defenses are found within Chapter 30 of the crimes code. To find an individual guilty of trafficking in individuals under Chapter 30, there is a simple equation: acts + means + purpose = sex trafficking. However, this simple equation is not readily apparent under Pennsylvania's current comprehensive human trafficking law, which is split between two statutes: 18 PA Cons Stat §§ 3011 and 3012. The acts are enumerated in § 3011(a): recruits, entices, solicits, patronizes, advertises, harbors, transports, provides, obtains, maintains, or knowingly benefits financially or receives anything of value [35]. The means of force, fraud, or coercion are enumerated in § 3012(b) [36]. And the purposes of a commercial sex act, sexual servitude, or involuntary servitude are outlined in § 3011 and § 3012(a).

Pennsylvania should simplify and modernize Chapter 30 to aid in the successful prosecution of human trafficking crimes, eliminate confusion, and close the loopholes that currently allow offenders to evade meaningful consequences. A streamlined and consolidated statute would allow prosecutors to focus their efforts on protecting victims and dismantling systems of trafficking. Specifically, Pennsylvania should repeal § 3013 altogether, as it is redundant now that the act of "patronizes" has been added to § 3011(a). Those who buy sex from a trafficking victim are traffickers and should be treated as such, rather than receiving a carveout through § 3013 [37].

Modernizing Chapter 30 is equally critical to ensuring laws are accurate, clear, and centered around victims rather than criminalizing those who are exploited. Outdated or fragmented language can unintentionally shift attention away from exploiters and create barriers to successful prosecution. By restructuring and consolidating Chapter 30, Pennsylvania can make it unmistakably clear that traffickers, facilitators, and sex buyers are the proper targets of prosecution, not victims. Achieving justice means dismantling the systems that allow exploitation to continue.

PREVENTION of Human Trafficking

POLICY RECOMMENDATION:

Prevent human trafficking by consolidating Chapter 30 funding and setting forth steady appropriation of such funds in the annual budget.

When combatting the demand for commercial sexual exploitation, the law already provides us with necessary tools; we just need to use them. We do this through raising public awareness, education, and forging partnerships across government, private and non-governmental sectors.

18 PA Cons Stat § 3064 (2018) created the Safe Harbor for Sexually Exploited Children Fund [38]. The law requires the fund to be established in the State Treasury and administered by the Department of Human Services (DHS). Section (a)(3) details that money for the fund may be appropriated by the General Assembly or DHS may apply for “federal grants and contributions from other public, quasi-public or private sources.” Furthermore, per section (a)(4), at least 50% of the fund may be used by the Department of Human Services for victim services, at least 40% may be expended to increase public awareness through an anti-demand campaign, and no more than 10% of the fund can be expended for the costs of operating and maintaining the fund.

In addition to the percentages currently carved out in § 3064, 18 PA Cons Stat § 3031 sets forth that the Pennsylvania Commission on Crime and Delinquency (PCCD) is tasked with funding state agencies, units of local government, and nongovernmental organizations to “develop, expand or strengthen” programs for survivors of human trafficking, ensure prevention of human trafficking, and ensure the protection of survivors [39]. These measures can include funding greater access to mental health resources, immigration services, housing, increased public awareness, or heightened training for first responders.

Rather than splitting the funds between two state agencies, PCCD should control all of the money pursuant to § 3031 which allows PCCD to administer grants to other state agencies. Furthermore, in order to ensure continuity of programming, a steady appropriation from the legislature set forth in the annual budget would ensure funding remains stable while not needing to rely on successful prosecutions to generate fines. These combined changes would permit continuous access to such funds, improving the state’s response to human trafficking overall. Collaborations such as this more effectively combat commercial sexual exploitation when there is bipartisan support that ensures anti-trafficking work is made a political priority.

REFERENCES

1. 18 Pa.C.S. § 5902(e)
2. 18 Pa.C.S. § 5902(a)
3. Abby Kelley and Collin Sykes, *The Language of Exploitation*, Villanova Law Review (July 11, 2013), <https://www.villanovawlawreview.com/post/2067-the-language-of-exploitation> (last visited June 1, 2026)
4. *Word and Image Choices and Why They Matter*, Polaris, <https://polarisproject.org/telling-the-real-story-of-human-trafficking/word-and-image-choices-and-why-they-matter/> (last visited June 1, 2026)
5. Carrie Baker, *An Intersectional Analysis of Sex Trafficking Films*, Study of Women, Gender, & Sexuality: Faculty Publications, Smith College (Nov. 1, 2014), https://scholarworks.smith.edu/cgi/viewcontent.cgi?article=1003&context=swg_facpubs (last visited June 1, 2026)
6. 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 (Sept. 21, 2015), <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 June 1, 2026)
7. *Forced Criminality: Involuntary Crimes*, Office to Monitor and Combat Trafficking in Persons, United States Dep't of State, <https://www.state.gov/wp-content/uploads/2026/04/Forced-Criminality-Accessible-4.15.2026.pdf> (last visited June 1, 2026)
8. *Promising Practices for Responding to Survivors of Human Trafficking in the Healthcare Setting*, Office to Monitor and Combat Trafficking in Persons, United States Dep't of State, <https://www.state.gov/wp-content/uploads/2026/04/Promising-Practices-for-Responding-to-Survivors-of-Human-Trafficking-040126-Accessible.pdf> (last visited June 1, 2026)
9. Emma Sullivan, Student Blog Series: The Value of Trauma-Informed Care in Working with Survivors, The Villanova Law Institute to Address Commercial Sexual Exploitation (Mar. 24, 2018) <https://cseinstitute.org/student-blog-series-value-trauma-informed-care-working-survivors/> (last visited June 1, 2026)
10. *Gaps in Reporting Human Trafficking Incidents Result in Significant Undercounting*, National Institute of Justice (Aug. 4, 2020), <https://nij.ojp.gov/topics/articles/gaps-reporting-human-trafficking-incidents-result-significant-undercounting> (last visited June 1, 2026)
11. *What is the Equality Model?*, Equal Not Exploited, <https://www.equalitymodelus.org/why-the-equality-model/> (last visited June 1, 2026)
12. *Maine Becomes First U.S. State to Pass Equality Model Law*, Coalition Against Trafficking in Women (July 11, 2023), <https://catwinternational.org/2023/07/maine-becomes-first-u-s-state-to-pass-equality-model-law/> (last visited June 1, 2026)
13. *A Long Overdue Shift - The Trafficking Survivors Relief Act*, The Villanova Law Institute to Address Commercial Sexual Exploitation (Mar. 30, 2026), <https://cseinstitute.org/a-long-overdue-shift-the-trafficking-survivors-relief-act/> (last visited June 1, 2026)
14. H.R.4323 - 119th Congress (2025-2026): Trafficking Survivors Relief Act, <https://www.congress.gov/bill/119th-congress/house-bill/4323> (last visited June 1, 2026)
15. *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking*, Polaris (July 2018), <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Hotels-and-Motels.pdf> (last visited June 1, 2026)
16. Commonwealth v. Berger, 417 Pa. Super. 473, 479 (Super. Ct. 1992)
17. 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> (last visited June 1, 2026); *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 June 1, 2026); *The Use of Forced Criminality: Victims Hidden Behind the Crime*, Office to Monitor and Combat Trafficking in Persons, United States Dep't of State (June 2014), <https://2009-2017.state.gov/documents/organization/233938.pdf> (last visited June 1, 2026)

REFERENCES

18. Alaina Richert, *Failed Interventions: Domestic Violence, Human Trafficking, and the Criminalization of Survival*, 120 Mich. L. Rev. 315, 315 (Nov. 2021)
19. Erin Marsh, Brittany Anthony, Jessica Emerson & Kate Mogulescu, *State Report Cards: Grading Criminal Record Relief Laws for Survivors of Human Trafficking*, Polaris (Mar. 1, 2019), <https://polarisproject.org/wp-content/uploads/2019/03/Grading-Criminal-Record-Relief-Laws-for-Survivors-of-Human-Trafficking.pdf> (last visited June 1, 2026)
20. Becky Feldman, *The Second Look Movement: A Review of the Nation's Sentence Review Laws*, The Sentencing Project (May 15, 2024), <https://www.sentencingproject.org/reports/the-second-look-movement-a-review-of-the-nations-sentence-review-laws/#footnote-ref-1> (last visited June 1, 2026)
21. H.R.6471 – 119th Congress (2025–2026): Justice in Sentencing for Survivors Act of 2025, <https://www.congress.gov/bill/119th-congress/house-bill/6471/all-info> (last visited June 1, 2026)
22. S1077 (2019–2020): Domestic Violence Survivors Justice Act, <https://www.nysenate.gov/legislation/bills/2019/S1077> (last visited June 1, 2026)
23. DVSJA Data, Survivors Justice Project (April 2026), <https://www.sjpnj.org/dvsjadata> (last visited June 1, 2026)
24. H.R.4405 – 119th Congress (2025–2026): Epstein Files Transparency Act, <https://www.congress.gov/bill/119th-congress/house-bill/4405> (last visited June 1, 2026)
25. Epstein Survivor PSA, World Without Exploitation (Nov. 16, 2025), https://www.youtube.com/watch?v=FEz_YoaIQCE (last visited June 1, 2026)
26. *Victim-Centered Criminal Justice: Improvements to Federal Guidelines for Prosecutors*, Polaris (Feb. 8, 2023), <https://polarisproject.org/blog/2023/02/victim-centered-criminal-justice-improvements-to-federal-guidelines-for-prosecutors/> (last visited June 1, 2026)
27. *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking*, Polaris (July 2018), <https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Hotels-and-Motels.pdf> (last visited June 1, 2026)
28. H.B.1286 (2025–2026), <https://www.palegis.us/legislation/bills/2025/hb1286> (last visited June 1, 2026)
29. *Report on Commercial Sexual Exploitation in Pennsylvania*, The Villanova Law Institute to Address Commercial Sexual Exploitation (2016), <https://cseinstitute.org/wp-content/uploads/2016/11/CSE-Institute-Report-on-CSE-in-Pennsylvania.pdf> (last visited June 1, 2026)
30. *The Super Bowl Myth*, Polaris (Feb. 5, 2016), <https://polarisproject.org/blog/2016/02/the-super-bowl-myth/> (last visited June 1, 2026)
31. Pennsylvania Human Trafficking Resource & Coordination Project, Pennsylvania Commission on Crime and Delinquency, <https://www.pa.gov/agencies/pccd/programs-and-services/human-trafficking-in-pa> (last visited June 1, 2026)
32. 18 PA Cons. Stat. § 3019(d), <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&div=0&chapter=30&ion=19&subscn=0> (last visited June 1, 2026)
33. 18 PA Cons. Stat. § 3019(b), <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&div=0&chapter=30&ion=19&subscn=0> (last visited June 1, 2026)
34. H.B.753 (2025–2026), <https://www.palegis.us/legislation/bills/2025/hb753> (last visited June 1, 2026)
35. 18 PA Cons. Stat. § 3011, <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&chpt=30&sctn=11> (last visited June 1, 2026)
36. 18 PA Cons. Stat. § 3012, <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&div=00.&chpt=030.&sctn=012.&subscn=000> (last visited June 1, 2026)
37. 18 PA Cons. Stat. § 3013, <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&div=00.&chpt=030.&sctn=013.&subscn=000> (last visited June 1, 2026)
38. 18 PA Cons. Stat. § 3064, <https://www.palegis.us/statutes/consolidated/view-statute&txtType=PDF&ttl=18&div=00.&chpt=030.&sctn=064.&subscn=000> (last visited June 1, 2026)
39. 18 PA Cons. Stat. § 3031, <https://www.palegis.us/statutes/consolidated/view-statute?txtType=HTM&ttl=18&div=0&chpt=30&sctn=31&subscn=0> (last visited June 1, 2026)



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