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International Team
For the Study of Security
Verona

**Human Trafficking Online:
New Tools and New Types of Victims**

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ITSS Verona Magazine, Vol. 1, no. 1

Spring/Summer 2022

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To cite this article: Sara Tibidò, *Human Trafficking Online: New Tools and New Types of Victims*, ITSS Verona Magazine, Vol. 1, no. 1, Spring/Summer 2022.

Keywords: Human Trafficking, New Technologies, Section 230 CDA, Non-State Actors, International Regulation

ITSS Verona website: <https://www.itssverona.it/itss-magazine>

LinkedIn: <https://www.linkedin.com/company/itss-verona/>

Instagram: https://instagram.com/itss_verona?igshid=YmMyMTA2M2Y=

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Published online: June 18th, 2022

Abstract: This piece explores the challenges new technologies and the internet pose to individuals' security, especially women and children. We review how these platforms provide new tools for carrying out and facilitating crimes such as human trafficking, and utilize the case study of a U.S. federal law, Section 230 of the *Communication Decency Act (CDA)*, which regulates the civil immunity of online platforms for content posted by third parties to explore how technology may offer a "safe harbor" to platforms that contained messages or advertising related to human trafficking. Because crimes that take place online transcend traditional geographical borders, the absence of minimum common and effective international standards complicates victims' efforts to obtain justice. In this respect, this piece argues that while the internet is not responsible *per se*, State legislatures, together with non-state actors, stand to play a relevant role in defending and guaranteeing human rights across online spaces.

The rapid expansion of the internet and online technologies is affecting numerous aspects of daily life all over the world.¹ According to the International Telecommunication Union (ITU), the United Nations specialized agency for information and communication technologies, in 2018 there were 3.7 billion internet users worldwide. The Covid-19 pandemic has marked a meaningful increase, with 4.6 billion people now using the internet.² Continuing this upward trend, the increase in internet users worldwide is expected to exceed 60% of the global population, involving approximately 4.9 billion people in the next few years.³

Although this data indicates that internet access has grown, it is still far from being truly universal or equally distributed. Indeed, according to ITU estimates, the percentage of internet users is much higher in developed countries (90%) than in developing countries (57%), and is even lower in the least developed countries (27%). The percentage of people using the internet in Africa in 2021, for example, was 33%, as compared to 87% in Europe.⁴ Moreover, though it seems that some progress are done toward gender parity, with a global gender parity score improved from 0.89 in 2018 to 0.92 in 2020, where a value between 0.98 and 1.02 reflects a complete achievement of parity, there is still an important division that persists between people according to their location. Indeed, internet access in urban areas is estimated at 76% while that in rural areas falls to only 39%.⁵

The increase of internet users throughout the last decades has been notable and has given more and more people the possibility to interact in online spaces, with new tools and resources. While new technologies are not considered harmful *per se*, they are sometimes

¹ Mark Latonero, "Human Trafficking Online: The Role of Social Networking Sites and Online Classifieds," *SSRN Electronic Journal*, 2011, <https://doi.org/10.2139/ssrn.2045851>, 8.

² "Individuals Using the Internet," ITU statistics, 2021, <https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx>.

³ ITU estimation (4.9 billion, 63% in 2021), 2021, <https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx>;

⁴ "Measuring Digital Development – Facts and Figures 2021," ITU Publications, 2021, <https://www.itu.int/itu-d/reports/statistics/facts-figures-2021/>, 2.

⁵ See note above, 3-4 and 6.

misused and can provide efficient, and often anonymous, ways to commit illegal actions and crimes, such as the trafficking of human beings.⁶ Indeed, cyber technologies have given traffickers the unprecedented ability to exploit a greater number of victims while expanding their operations beyond traditional geographic boundaries.⁷

The use of technology in trafficking takes many forms. First, is the crucial use of text messaging, digital cameras and mobile devices to “offer, advertise and sell sex services.” Traffickers make use of technology to send photos of their victims to potential customers in real time, so as to rapidly arrange transactions or place and change online ads concerning these victims.⁸ Second, technology and social networking sites are used by traffickers to identify and recruit new potential victims. In the case of labour trafficking, for example, the creation of fictitious employment or immigration assistance websites are used to put victims in contact with traffickers. A third case is that of coerced victims offered to consumers over the internet and forced to perform sex acts online through webcams and chat technologies.⁹

The challenges posed by the internet were defined in 2012 by the 44th President of the United States, Barack Obama, as “one of the most pressing human rights issues of our time.”¹⁰ Despite this recognition, a comparison of laws on the issue of human trafficking made in 2012 across all U.S. states and Washington DC evidenced that only a few states had “enacted laws that address the role of technology in facilitating and disrupting human trafficking.”¹¹

⁶ Council of Europe, “Group of Specialists on the Impact of the Use of New Information Technologies on Trafficking in Human Beings for the Purpose of Sexual Exploitation,” Together Against Trafficking in Human Beings, 2003, https://ec.europa.eu/anti-trafficking/group-specialists-impact-use-new-information-technologies-trafficking-human-beings-purpose-sexual_it, 17.

⁷ Greiman V. and Bain C., “The emergence of cyber activity as a gateway to human trafficking,” *Journal of Information Warfare*, Vol.12 No.2, Peregrine Technical Solutions, 2013, <https://www.jstor.org/stable/26486854>, 42.

⁸ See note above, 42-43.

⁹ See note above, 44.

¹⁰ Mark Latonero et al., “The Rise of Mobile and the Diffusion of Technology-Facilitated Trafficking,” *University of Southern California - Center on Communication Leadership & Policy*, November 13, 2012, https://doi.org/https://cpb-us-e1.wpmucdn.com/sites.usc.edu/dist/e/695/files/2012/11/HumanTrafficking2012_Nov12.pdf, 14.

¹¹ See note above.

Nowadays, the challenge for legislatures is finding a way to uniformly define and address the technologies used to perpetrate these crimes.¹² In a global and interconnected world, where things change and evolve quickly, legislation needs to consider and face this new challenge to human rights, both in their protection and in their violation in situations of regulatory gaps.

Section 230 – Communication Decency Act

Many social networks and specific websites that have been used to facilitate human trafficking (such as *Backpage.com*, now seized) are legally based in the U.S. This may complicate victims' efforts to obtain justice, due to both the difficulty of locating anonymous defendants and the need to overcome the high wall of immunity provided by Section 230 of the Communication Decency Act.¹³ This federal law confers immunity from civil liability to digital intermediaries for the contents published by third parties on their platforms. This immunity applies even when they choose to take control and remove content in a “Good Samaritan” act.¹⁴

This law was the result of an attempt to balance the principle and the right of freedom of expression (one of the pillars of the U.S. Constitution's First Amendment) and the necessity to keep obscene and harmful content away from users. The debate began with a famous case: in 1995, a society founded by Jordan Belfort and Danny Porush, the *Stratton Oakmont Inc.*, sued *Prodigy Services Corp.*, an Internet Services Provider (ISP), on charges of defamation for a statement published in its popular message board concerning *Stratton Oakmont Inc.*¹⁵ The New York Supreme Court, finding that *Prodigy* held itself out as a “family-friendly” provider with policies of monitoring and editing content, and without

¹² Latonero et al., “The Rise of Mobile,” 15.

¹³ Benjamin Volpe, “From Innovation to Abuse: Does the Internet Still Need Section 230 Immunity?,” *Catholic University Law Review* 68, no. 3 (2019), <https://scholarship.law.edu/lawreview/vol68/iss3/11>, 598.

¹⁴ Brett G. Johnson, “Beyond Section 230: Liability, Free Speech, and Ethics on Global Social Networks,” *The Business, Entrepreneurship & Tax Law Review* 2, no. 2, Symposium: Innovation in Media and Entertainment Law (2018), <https://scholarship.law.missouri.edu/betr/vol2/iss2/4/>, 288.

¹⁵ No. 31063194, 1995 N.Y. Misc. LEXIS 229 (N.Y. Sup. Ct. May 24, 1995).

considering evidence that the company had millions of subscribers with evident difficulty in screening each message manually, found *Prodigy* to be a publisher for the purposes of defamation.¹⁶ Thus, even without the defamatory statements, the company would be liable as a publisher due to its policies. This judgment set up a “paradoxical no-win situation” in which the more an ISP tried to keep some type of material (obscene or harmful, for example) away from its users, the more it would be liable for that material. Consequently, an ISP has a strong incentive to over-filter in order to avoid litigation.¹⁷

This case opened a discussion about the relationship between liability and freedom of expression in cyberspace. The following year, in 1996, the U.S. Congress adopted the *Communications Decency Act (CDA)* as part of the *Telecommunications Act*.¹⁸ In particular, Section 230 states:

“(c) Protection for "Good Samaritan" blocking and screening of offensive material

(1) Treatment of publisher or speaker

No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider.

(2) Civil liability

No provider or user of an interactive computer service shall be held liable on account of-

(A) any action voluntarily taken in good faith to restrict access to or availability of material that the provider or user considers to be obscene, (...), whether or not such material is constitutionally protected; or

(B) any action taken to enable or make available to information content providers or others the technical means to restrict access to material described in paragraph.”¹⁹

¹⁶ Paul Ehrlich, “Communications Decency Act § 230,” *Berkeley Technology Law Journal* 17, no.1, Annual Review of Law and Technology (2002), <http://www.jstor.org/stable/24120113>, 404.

¹⁷ See note above.

¹⁸ Danielle K. Citron and Benjamin Wittes, “The Problem Isn’t Just Backpage: Revising Section 230 Immunity,” *Georgetown Law Technology Review*, no.2 (2018), https://scholarship.law.bu.edu/faculty_scholarship/631, 456.

¹⁹ United State Code (USC), “Title 47-TELECOMMUNICATIONS: 230: Protection for private blocking and screening of offensive material,” Office of the Law Revision Counsel, Paragraph C, <https://uscode.house.gov/view.xhtml?req=title:47%20section:230%20edition:prelim>.

Congress intended that ISPs be immune from suits, because their function is to provide online access and not to create content²⁰. However, some are concerned that immunity under Section 230 of the CDA removes the burden on service providers to police the content posted on their websites. In a 2011 case (*M.A. ex rel. P.K. v. Village Voice Media Holdings, LLC*), for example, a minor sought to hold website operator *Backpage.com* liable for having been sexually trafficked. Indeed, the trafficker had used the website to post in the ads sexually explicit images of the minor. However, the Court, despite the fact that *Backpage.com* provided tools for filtering postings in adult categories and profited from the activities of its users, held that the immunity under Section 230 was extended to the website since it decreed that *Backpage.com* was not responsible for the content of the ad, nor did it do anything to encourage such content.²¹

A similar case occurred in 2016 (*Jane Doe No.1 v. Backpage.com*).²² The plaintiffs, victims of sex trafficking, sued the same website, alleging that *Backpage.com* did not enjoy immunity by Section 230 because “it had deliberately structured its service to enable sex trafficking”.²³ Nevertheless, the evidence showed that the defendant had deleted postings discouraging sex trafficking and changed its rules to protect the practice: the accusing party had shown evidence that the website had tailored its rule to avoid the detection of the crime allowing, for example, anonymized email. However, despite the evidence being recognized as “persuasive,” the Court judged that *Backpage.com* enjoyed immunity from liability.²⁴

For a while, the website appeared to have implemented policies on sensitive content, especially between 2008 and 2009, in order to filter or entirely delete an ad if it contained a

²⁰ Volpe, “From Innovation to Abuse,” 603.

²¹ Latonero et al., “The Rise of Mobile,” 18.

²² *Jane Doe No. 1 v. Backpage.com LLC* (1st Cir. March 14, 2016), <https://casetext.com/case/does-v-backpagecom-llc-1>

²³ Citron and Wittes, “The Problem Isn’t Just Backpage,” 460.

²⁴ Citron and Wittes, “The Problem Isn’t Just Backpage,” 461.

term from a list of “forbidden words”. Already in 2009, however, it was quite clear that this policy was failing, as *Backpage.com* recognized that removing entire ads with illegal content was not good for their business and thus opted instead to just edit ads, knowingly eliminating possible evidence of illegal activities.²⁵ Moreover, in 2017, in a Report of the Permanent Subcommittee on Investigation of the U.S. Senate, it was found that the executives were aware that websites facilitated illegal activities such as child sex trafficking.²⁶ As result, in April 2018, the U.S. Department of Justice seized the website for prostitution ads involving child victims of sex trafficking.²⁷

In the same year, Congress passed the *Allow States and Victims to Fight Online Sex Trafficking Act 2017*, which clarifies that “Section 230 was never intended to provide legal protection to websites that unlawfully promote and facilitate prostitution and websites that facilitate traffickers in advertising the sale of unlawful sex acts with sex trafficking victims.”²⁸

Since its implementation in 1996, Section 230 has been interpreted and applied in a variety of different ways across different cases by US judges. Sometimes, as is shown by the cases just presented, the Section has offered a “safe harbor”²⁹ for platforms, even when they are not properly acting as a “good Samaritan.” These cases offer dangerous precedents for the protection of individuals and human rights in online spaces. For this reason, it is important to involve non-State actors, such as private entities and NGOs, in the active process of

²⁵ Committee on Homeland and Security and Governmental Affairs (Portman R., McCaskill C.), U.S. Senate, “Backpage.com’s Knowing Facilitation of Online Sex Trafficking – Staff Report,” *Permanent Subcommittee on Investigations* (January 10, 2017): 18-21, <https://www.hsgac.senate.gov/subcommittees/investigations/hearings/backpagecoms-knowing-facilitation-of-online-sex-trafficking>.

²⁶ See note above, 16-17.

²⁷ “Justice Department Leads Effort to Seize Backpage.com, the Internet’s Leading Forum for Prostitution Ads, and Obtains 93-Count Federal Indictment”, U.S. Department of Justice, Office of Public Affairs (Press Release No. 18-427), April 9, 2018, <https://www.justice.gov/opa/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution-ads>.

²⁸ Pub. L. No. 115-164, 132 Stat. 1253, § 2, Apr. 11, 2018, SEC. 2.(1) SENSE OF CONGRESS, <https://www.congress.gov/115/plaws/publ164/PLAW-115publ164.pdf>

²⁹ Citron and Wittes, “The Problem Isn’t Just Backpage,” 455.

monitoring and guaranteeing human rights are observed and protected in online platforms. Although States are the main duty-bearers concerning human rights, private actors should also have a responsibility in this respect.³⁰

The role of Non-State Actors

Intermediaries, as private entities, are not the most suitable actors to determine whether content is legal or illegal, since this requires a balance of competing interests.³¹ Following the guiding principles of corporate social responsibility, ISPs and Internet Companies have the opportunity to take a part in a collective response to the problem of human trafficking.

However, it must be acknowledged that the detection of individuals engaged in human trafficking online is an extremely difficult task for technology firms.³² The efforts of private entities are (or should be) supported by the work of Nongovernmental Organizations (NGOs). Since many NGOs work directly with the victims of trafficking, they can play a fundamental role in understanding how technology can be used in anti-trafficking efforts.³³

One of the most important functions that NGOs perform is “as collectors, filterers, translators and presenters of information regarding alleged violations”.³⁴ These human rights organizations collect popular concerns and popular support for various cases, generating political pressure, and then translate that into activities targeted to protect, prevent and end abuses. To this end, the internet, which facilitates quick and inexpensive transfer of information all over the world, can play an important role.³⁵

³⁰ Frank La Rue, “Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression,” *UN General Assembly: Human Rights Council* (May 11, 2011), https://www2.ohchr.org/english/bodies/hrcouncil/docs/17session/a.hrc.17.27_en.pdf, 13.

³¹ See note above, 12.

³² Latonero, “Human Trafficking Online,” 34-35.

³³ Latonero, “Human Trafficking Online,” 37.

³⁴ Jamie Frederic Metzl, “Information Technology and Human Rights,” *Human Rights Quarterly* 18, no. 4 (1996): 705-746, <https://doi.org/10.1353/hrq.1996.0045>, 707.

³⁵ See note above, 708.

The first step is connectivity. It was seen at the beginning of this article that internet access is not so universal or equally distributed. For NGOs of the poorest countries, since establishing an internet connection requires not only a physical apparatus but also education and training, connecting to information technology systems can be difficult or even impossible without assistance.³⁶ Despite these obstacles, NGOs have been able to create communication where none existed before, consolidate existing or develop new networks and increase the audience on specific human rights violations.³⁷

NGOs working through the internet face many new challenges. There is the risk of being overwhelmed by information overload, which can lead to difficulties in translating the amounts of information into a usable basis for knowledge or research, and which involve a considerable verification effort.³⁸ Another relevant challenge for human rights organizations is to be able to link their efforts in the dissemination of information with real action that can increase public awareness and involvement.³⁹

Together with sharing information and cooperation, NGOs working directly with the victims of trafficking have a primary role in improving services, support and in understanding how technology can be useful to anti-trafficking efforts. For this reason, they should consider cooperating with ISPs in order to agree on a “common ground” to utilize technological tools for better communication and information sharing.⁴⁰ It is also in social networking sites’ best interest, given the growth of socially-conscious consumer trends, to build client trust in their service.⁴¹ This may be linked with the so-called “spotlight phenomenon” according to which corporations, wanting to maintain a good brand image, adopt more socially responsible reforms in response to public anger. This phenomenon is expanding by the advancements in

³⁶ Metzl, “Information Technology,” 718.

³⁷ Metzl, “Information Technology,” 721.

³⁸ Metzl, “Information Technology,” 726-728.

³⁹ Metzl, “Information Technology,” 730-731.

⁴⁰ Latonero, “Human Trafficking Online,” 37-38.

⁴¹ See note 30.

telecommunications and information technologies and by the use of such channels by NGOs.⁴²

However laudable corporations' actions may be, these actions may be inadequate if the answer is not prompt and really effective, or if the users do not report illicit or illegal acts.⁴³

Conclusion

The internet offers new ways of conducting human trafficking, and emerging technologies are giving rise to new challenges in fighting this particular crime.⁴⁴ We have explored how technologies may not necessarily increase trafficking itself but facilitate its activity introducing challenges both at the legislative level and to the actions of non-state actors that also can take part in this collective response.⁴⁵

At the international level, there remain no effective internationally approved instruments to regulate what circulates on the internet, which in turn leaves loopholes for trafficking in human beings, specifically for sexual exploitation. This evidences the need for “minimum common and effective international standards” and for a more cooperative attitude between countries. While child pornography, for example, is categorically banned in most countries, the attitude towards trafficking of adults is much less clear and legal action seems to be less effective.⁴⁶

To face these challenges, a first step is to review legislation. Section 230 CDA and its immunity have been broadly interpreted over the years and have created a high wall difficult to overcome for those seeking restitution. As such, it seems to have served to facilitate “Bad Samaritan” behaviors, rather than a “Good Samaritan” approach.

⁴² Colin M. Barry, Chad K. Clay and Michael E. Flynn, “Avoiding the Spotlight: Human Rights Shaming and Foreign Direct Investment,” *International Studies Quarterly* .57, no. 3 (2013), <https://www.jstor.org/stable/24017922>, 534-535.

⁴³ Latonero, “Human Trafficking Online,” 36.

⁴⁴ Greiman and Bain, “The emergence of cyber activity as a gateway to human trafficking”, *Journal of Information Warfare* 12, no. 2 (2013): 48, <https://www.jstor.org/stable/26486854>.

⁴⁵ Council of Europe, “Group of specialists,” 93.

⁴⁶ See note above, 94.

A second step concerns raising awareness through education and training systems, to enable young people, judges, journalists, police forces, partners in the private sector, and all entities potentially involved in counter-trafficking initiatives, to learn how to use new technologies to advance trafficking reduction. In particular ISPs, hosts, access providers, authors, companies and individuals should be made aware of the danger of broadcasting illegal content, thus underlining the work of governments in encouraging a code of good conduct and self-regulation.⁴⁷ In this regard, it is relevant to also consider the role of NGOs: along with their role of disseminating information, sensitizing and taking action, NGOs can work with ISPs, that have an interest in maintaining a good image, to find a transnational common ground for action and develop sustained and fruitful cooperation.

While it is true that new technologies can facilitate human rights violations, there is still much to be researched and analyzed. Trafficking in persons across online spaces sadly represents just one typology of the new victims that suffer from the dangers that new technologies, maybe not enough regulated, pose to human security.

⁴⁷ Council of Europe, “Group of specialists,” 97.

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