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SUPREME COURT, U.S.

IN THE
Supreme Court of the United States

KEO RATHA, *et al.*,

Petitioners,

v.

PHATTHANA SEAFOOD CO., LTD., *et al.*,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED
STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

**BRIEF OF HUMAN RIGHTS AND LABOR
RIGHTS ORGANIZATIONS AND EXPERTS
AS *AMICI CURIAE* IN SUPPORT OF
PETITIONERS**

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INTERESTS OF *AMICI CURIAE*¹

Since Congress first enacted the Trafficking Victims Protection Act of 2000, it has expanded and strengthened it through successive reauthorizations.² Congress has broadened the scope of the TVPRA in order to impose criminal and civil liability on individuals, corporations, and other legal persons who use, or knowingly benefit from ventures that use, forced labor, as well as those who aid and abet these practices. Through this legislation, Congress has bolstered efforts to hold traffickers accountable, opening the courthouse doors to victims of these egregious crimes.

The Ninth Circuit's decision below undermined the very statutory scheme Congress put in place to combat forced labor by restrictively interpreting due process requirements and finding respondents were beyond the reach of the statute. The court's decision not only misapplies the law of this Court and conflicts with other Courts of Appeals, but it seriously impairs the TVPRA and Congress's efforts to fight against human trafficking and forced labor. Because the court's decision is wrong and will significantly compromise the enforcement and intended purpose of the TVPRA, the following

1. No counsel for any party has authored this brief in whole or in part, and no person other than the *amici curiae* or its counsel has made any contribution intended to fund the preparation or submission of this brief. After receiving timely notice, the parties have consented to the filing of this brief.

2. *Amici* refer to the Trafficking Victims Protection Act of 2000 along with its subsequent reauthorizations and amendments as the "TVPRA," except where specifically noted otherwise.

organizations respectfully submit this brief as *amici curiae* in support of petitioners.

Freedom Network USA (“FNUSA”) is the largest alliance of advocates against human trafficking in the United States, including ninety-one members that serve more than 2,000 trafficking survivors per year in over forty cities.

Global Labor Justice-International Labor Rights Forum (“GLJ-ILRF”) works transnationally to advance policies and laws that protect decent work, strengthen workers’ ability to advocate for their rights, and hold corporations accountable for labor rights violations in their supply chains.

Greenpeace USA (“GPUS”) is part of global Greenpeace, a network of independent campaigning organizations that expose global environmental problems and promote solutions that are essential to a green and peaceful future, including working to expose the nexus of forced labor and environmental destruction pervasive in the commercial fishing industry.

The Human Trafficking Institute (“HTI”) works to stop human trafficking at its source by empowering police and prosecutors to stop traffickers.

The Human Trafficking Legal Center (“HTLC”) is a non-profit organization that advocates for justice for victims of human trafficking and forced labor and uses U.S. law to hold corporations accountable for forced labor in global supply chains.

The International Lawyers Assisting Workers Network (“ILAW”), a program of the Solidarity Center, is a global network of lawyers and advocates from over 80 countries dedicated to the promotion and defense of workers’ rights worldwide, including the elimination of forced labor.

Oxfam America is a development and human rights organization with operations across the globe. It pushes companies to weed out forced labor in its agribusiness supply chains, with a particular focus on the seafood sector in Southeast Asia.

Share (Asia Pacific) Limited (“Liberty Shared”) aims to prevent human trafficking through legal advocacy, technological interventions, and strategic collaborations with NGOs, corporations, and financial institutions globally.

David Abramowitz is a Professor and former Chief Counsel for the Committee on Foreign Affairs of the U.S. House of Representatives.

Janie Chuang is a Professor of Law at American University Washington College of Law. Professor Chuang teaches and writes about issues relating to human trafficking, labor migration, and global governance.

SUMMARY OF THE ARGUMENT

The Ninth Circuit's erroneous decision in this case thwarts the very purpose of the TVPRA. In finding that respondents were not "present in the United States," as set forth in 18 U.S.C. § 1596, the Ninth Circuit undermined the very scheme Congress put in place to combat forced labor ventures just like the one in this case. There is no real dispute here that respondents subjected petitioners to forced labor.³ There is also no doubt that the shrimp petitioners were forced to package was intended for sale in the United States. And, yet, the Ninth Circuit, applying the purposeful-direction test to define the limits of due process here, found that respondents could not be held liable under the TVPRA.

Jurisdiction over defendants who violate U.S. law through conduct targeting U.S. markets comports with due process, and there is no justification for the Ninth Circuit's holding otherwise. Congress created explicit extraterritorial jurisdiction in 2008, expanding the TVPRA's reach to apply to forced labor perpetrated outside of the United States. It did so after years of investigation and hearings. *See generally* *Brief of Members of Congress Sen. Blumenthal, Rep. Smith et al., Nestlé USA, Inc. v. John Doe I, et al.*, 141 S. Ct. 1931 (2021)

3. Respondents conceded in their motions for summary judgment that triable evidence supported at least four of petitioners' allegations that they were subject to peonage, forced labor, involuntary servitude, and human trafficking while employed by respondents. Because the Ninth Circuit held that respondents did not fall within the extraterritorial jurisdiction authorized in § 1596(a)(2), it did not reach whether the other three of petitioners' claims could survive summary judgment. *See* Pet. App. 15a n.4.

(Nos. 19-416 & 19-453). Congress provided mechanisms – both civil and criminal – to hold perpetrators of human trafficking abroad accountable in the United States, creating a narrowly-tailored jurisdictional regime. The Ninth Circuit has twisted this regime, undercutting all efforts to use the law as Congress intended.

The court's error was compounded by its assessment of the relevant "harm" for purposes of the purposeful-direction test. Nothing in due process jurisprudence limits the consideration of harm to direct injuries suffered by a plaintiff only within the U.S. Imposing such a requirement on trafficking victims seeking recovery from perpetrators who expressly targeted a U.S. market eviscerates the accountability Congress created under the TVPRA.

In short, the court's errors below not only skew the due process principles the court purported to apply, but they severely weaken enforcement efforts aimed at human trafficking. The TVPRA is an essential measure carefully designed to combat the unique and significant challenges created by the transnational nature of human trafficking and forced labor. The Ninth Circuit's decision undermines the very provisions enacted to combat the complexities of this global problem.

ARGUMENT

In the decision below, the Ninth Circuit found that respondents were not "present in the United States," as set forth in 18 U.S.C. § 1596, after consideration of the due

process principles governing specific jurisdiction.⁴ In so doing, the Ninth Circuit misapplied *Calder v. Jones*, 465 U.S. 783 (1984), by requiring application of the purposeful-direction test for all intentional torts and analogous claims and by focusing solely on the location of the harm suffered by petitioners as opposed to respondents' contacts with the forum. *Ratha v. Phatthana Seafood Co.*, 35 F.4th 1159, 1172 n. 13 (9th Cir. 2022). These errors subvert the TVPRA and undermine Congress's efforts to combat human trafficking.

I. Congress Enacted the TVPRA to Address the Global Problem of Human Trafficking and its Domestic Impact

A. Forced Labor

As the U.S. Department of State has recognized, labor trafficking “exists in formal and informal labor markets of both lawful and illicit industries, affecting skilled and unskilled workers from a spectrum of educational backgrounds.” U.S. Dep't of State, *Trafficking In Persons Report* 13 (2015) (“State Trafficking Report”).⁵ The

4. Respondents have never challenged personal jurisdiction here, and the question of specific jurisdiction is not before the Court. However, for purposes of its decision, the Ninth Circuit assumed that the scope of extraterritorial jurisdiction under the TVPRA, as set forth in 18 U.S.C. § 1596(a), could be defined by the same due process principles governing a court's power over a defendant. *Ratha*, 35 F.4th at 1172. As such, the court's holdings implicate any application of those principles and are not limited to the TVPRA context.

5. Available electronically at <https://www.state.gov/documents/organization/245365.pdf> (last accessed November 10, 2022).

risk, however, “is more pronounced in industries that rely upon low-skilled or unskilled labor,” including jobs “often filled by socially marginalized groups including migrants, people with disabilities, or minorities.” *Id.* at 14. Traffickers can and do “target vulnerable workers anywhere to fill labor shortages everywhere along a supply chain.” *Id.* at 13.

The pervasiveness of forced labor and labor trafficking is evident in the numbers. The International Labour Organization estimates that in 2021, 27.5 million people were trapped in forced labor. International Labour Organization, *Global Estimate of Modern Slavery: Forced Labour and Forced Marriage* 17 (2022).⁶ That is an increase of 2.7 million people since 2016. *Id.* at 2. More than 17 million of those people suffered forced labor in the private sector. *Id.* at 10. Moreover, that exploitation has been extraordinarily profitable for the private sector. It is estimated that the total illegal profits obtained from the use of forced labor worldwide amount to over \$150 billion per year. International Labour Organization, *Profits and Poverty: The Economics of Forced Labour* 13 (2014).⁷ Those profits, earned with near impunity, serve to feed and sustain forced labor.

Forced labor often occurs in supply chains outside of the United States. But the repercussions extend into markets far beyond the physical location of the forced

6. Available electronically at https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf (last accessed November 16, 2022).

7. Available electronically at http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_243391.pdf (last accessed November 10, 2022).

labor. End-markets, like that in the U.S., play a critical role in sustaining the system of labor exploitation. Goods made with forced labor must have markets, and U.S.-based corporations all too often knowingly purchase and sell goods made with forced labor because the subsidized labor allows for increased profits. Corporations engaged in ventures with these foreign suppliers reap profits in the forum state. “[C]orporations at the end of the supply chain may avoid the actual costs of providing for the workers, but they can still profit from obtaining cheaper goods.” Elizabeth M. Wheaton, Edward J. Schauer & Thomas V. Galli, *Economics of Human Trafficking*, 48 INT’L MIGRATION 114, 128 (2010); Laura Ezell, *Human Trafficking in Multinational Supply Chains: A Corporate Director’s Fiduciary Duty to Monitor and Eliminate Human Trafficking Violations*, 69 Vand. L. Rev. 499, 507 (2016).

The supplier’s reliance on forced labor distorts markets. As a result, U.S. corporations that do not rely on forced labor are placed at a competitive disadvantage, as they cannot compete in the market with the lower prices enabled by forced labor. See *Rodriguez, et al. v. Pan American Health Organization*, 29 F.4th 706, 716 n.5 (D.C. Cir. 2022) (“Section 1589(b) also protects commercial entities that decline to benefit from forced labor and may be harmed by competition from products or services garnering implicit subsidies from forced labor.”).

B. The TVPRA

In 2000, Congress passed the Trafficking Victims Protection Act—the first comprehensive piece of U.S. legislation aimed at prosecuting and preventing human

trafficking, including labor trafficking. See President William J. Clinton, *Statement by the President on HR 3244 10/28/00*, 2000 WL 1617225, at *1 (statute “provides important new tools and resources to combat the worldwide scourge of trafficking in persons and provides vital assistance to victims of trafficking.”). Over the next few years, Congress reauthorized the statute and expanded its provisions to include a civil cause of action, 18 U.S.C. § 1595, increase funding to combat trafficking, and authorize programs to assist victims. See *Br. of Members of Congress Sen. Blumenthal, et al.*, 141 S. Ct. 1931 (2021).

In 2008, Congress recognized that the statutory scheme’s scope of enforcement, intended to be comprehensive, suffered from critical gaps. For example, many perpetrators could evade the reach of the statute by committing human trafficking abroad and then shipping the forced-labor-tainted goods to the United States. Naomi Jiyoung Bang, *Unmasking the Charade of the Global Supply Contract: A Novel Theory of Corporate Liability in Human Trafficking and Forced Labor Cases*, 35 *Hous. J. Int’l L.* 255, 274 (2013). On the flip side, many domestic companies that knowingly profited from the trafficking could insulate themselves through creative structuring of their business ventures. See *id.* at 257 (“Corporations driving [the use of human trafficking and forced labor in supply chains] easily avoid accountability given the extraterritorial location of suppliers, and the appearance of ‘arm’s length’ contracts with their suppliers.”).

Congress sought to close these gaps with amendments to the TVPRA. *Id.* at 314. In particular, Congress added extraterritorial jurisdiction for a number of the statute’s

provisions. Congress also targeted the market for forced labor by imposing liability for individuals or entities who “knowingly benefit” from participation in a venture involving forced labor, among other offenses. 18 U.S.C. §§ 1595, 1596. The resulting statute was praised by legislators on both sides of the aisle as the culmination of a decade’s work “to ramp up our country’s efforts to prevent trafficking, protect victims, and prosecute perpetrators.” *See, e.g.*, 153 Cong. Rec. H14087, H14113 (daily ed. Dec. 4, 2007) (statement of Rep. John Lee).

II. The Ninth Circuit’s Exclusive Application of the Purposeful-Direction Test Unduly Narrows the Reach of the TVPRA

The Ninth Circuit’s decision below undermines the intended reach of the TVPRA by adopting an unjustifiably cramped interpretation of due process requirements. In particular, the court held that the purposeful-direction test from this Court’s *Calder* decision must be satisfied when a plaintiff brings intentional tort or analogous claims, such as a claim under the TVPRA, against a foreign defendant. *Ratha*, 35 F.4th at 1172. The purposeful-direction test provides that a defendant has the requisite contacts with a forum when it has: “(1) committed an intentional act, (2) expressly aimed at the forum state, (3) causing harm that the defendant knows is likely to be suffered in the forum state.” *Dole Food Co. v. Watts*, 303 F.3d 1104, 1111 (9th Cir. 2002). By mandating the application of this test, the Ninth Circuit effectively adopted these factors as additional due process requirements whenever a plaintiff brings claims based on the defendant’s intentional conduct.

As explained more fully in the petition, the Ninth Circuit's holding cannot be squared with the decisions of this Court and other Courts of Appeals. Purposeful direction is just one method of establishing a defendant's necessary contacts with the forum. But—just as in all other cases—jurisdiction in intentional tort cases also comports with due process where a defendant undertakes “some act by which [it] purposefully avails itself of the privilege of conducting activities within the forum State.” *Hanson v. Denckla*, 357 U.S. 235, 253 (1958). The Ninth Circuit erred in refusing to consider whether respondents had sufficient contacts under this purposeful-availing test, and its opinion conflicts with the decisions of other circuits that relied on the test to uphold jurisdiction over foreign defendants. See, e.g., *Atchley v. AstraZeneca UK Ltd.*, 22 F.4th 204, 215 (D.C. Cir. 2022) (finding foreign suppliers purposefully availed themselves of conducting business in forum based on contracts with U.S. manufacturer to be exclusive agent in Iraq); *Waldman v. Palestine Liberation Org.*, 835 F.3d 317, 342 (2d Cir. 2016) (“It should hardly be unforeseeable to a bank that selects and makes use of a particular forum’s banking system that it might be subject to the burden of a lawsuit in that forum for wrongs related to, and arising from, that use.”); *Licci ex rel. Licci v. Lebanese Canadian Bank, SAL*, 732 F.3d 161, 174 (2d Cir. 2013) (finding jurisdiction proper in United States where plaintiffs’ claims are related to defendant’s use of United States banks); *Louis Vuitton Malletier, S.A. v. Mosseri*, 736 F.3d 1339, 1357 (11th Cir. 2013) (finding foreign defendant’s solicitation of business from forum residents sufficient to support jurisdiction).

The Ninth Circuit’s holding is especially dangerous here because it undermines Congress’s intent in

enacting the TVPRA. Congress recognized the need for a comprehensive and creative solution to attack the problem of human trafficking and forced labor, including the need to hold foreign corporate actors accountable. *See* 22 U.S.C. § 7101(21) (“Trafficking of persons is an evil requiring concerted and vigorous action by countries of origin, transit or destination, and by international organizations”). Thus, Congress acted to expand the reach of the statute, and the Ninth Circuit’s imposition of additional requirements defeats the intended design by limiting the scope of corporations subject to the TVPRA. *Br. of Members of Congress Sen. Blumenthal, et al.* at 24-25 (“In 2008, Congress also clarified that the TVPRA was intended to reach extraterritorial conduct. The new § 1596 specified that ‘[i]n addition to any domestic or extra-territorial jurisdiction otherwise provided by law,’ federal courts have jurisdiction to hear criminal and civil allegations of extra-territorial forced labor and other TVPRA violations . . .”); *see also S.E.C. v. Joiner*, 320 U.S. 344, 350–51 (1943) (“[C]ourts will construe the details of an act in conformity with its dominating general purpose, will read the text in the light of context and will interpret the text so far as the meaning of the words fairly permits so as to carry out in particular cases the generally expressed legislative policy”). Under the Ninth Circuit’s decision, foreign corporations that use forced labor can escape liability under the statute while still targeting and profiting from United States consumers with their tainted products—the very outcome Congress sought to avoid.

Nor is there any justification for the Ninth Circuit’s restrictive interpretation of the due process limits. This Court has long recognized that a corporate defendant may be forced to answer for its conduct in a forum whenever

the defendant seeks to exploit that market or “delivers its products into the stream of commerce with the expectation that they will be purchased by consumers in the forum State.” *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 298 (1980); *see also Walden v. Fiore*, 571 U.S. 277, 285 (2014) (internal quotation marks and alterations omitted); *Keeton v. Hustler Mag., Inc.*, 465 U.S. 770, 781 (1984); *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 141 S. Ct. 1017, 1025 (2021). Simply put, “[d]ue process does not require [the court] to allow [a defendant] to exploit this country’s vast, rich markets and at the same time avoid the jurisdiction of our courts.” *Tobin v. Astra Pharm. Prod., Inc.*, 993 F.2d 528, 544 (6th Cir. 1993) (quoting *Mott v. Schelling & Company*, No. 91–1540, 1992 WL 116014, 1992 (6th Cir. May 29, 1992)).

The same principles should have applied here. As the Ninth Circuit acknowledged, respondents intentionally sought to exploit the U.S. market for shrimp and purposefully targeted their goods at the United States. *Ratha*, 35 F.4th at 1172. They made at least 14 shipments of shrimp, over 200 tons, to California during the time petitioners were forced to work for them, intending the shrimp to be sold to end-use consumers within this country. Moreover, the goods were packaged specifically for sale to Wal-Mart, and respondents worked with their distributor to ensure that their goods met the specifications required to be sold within the United States. Holding respondents to answer for their human-trafficking violations in the production of those goods falls easily within the limits of due process. There is simply no basis for the Ninth Circuit’s erroneous ruling, which improperly limits liability under the TVPRA, in direct contravention of the clear intent and purpose of Congress when enacting the statutory scheme.

III. The Ninth Circuit's Definition of "Harm" Ignores the Purpose of the TVPRA and the Realities of Human Trafficking

The Ninth Circuit also erred in its application of the purposeful-direction test by focusing on the physical location of petitioners instead of on the natural and foreseeable outcome of respondents' actions. Specifically, the court held that the third prong of the purposeful-direction test was not satisfied, that is, that respondents' conduct did not cause harm they knew was likely to be suffered in the United States. *Ratha*, 35 F.4th at 1172. In doing so, the court noted that it did not matter how many shipments respondents made to exploit the U.S. market because the injury was not suffered there. *Id.* at 1172 n.13. The court assumed that because petitioners were induced into labor trafficking in Cambodia and forced to work in Thailand, a harm did not occur within the United States. This myopic definition of "harm" is not required under the Due Process Clause and displays a fundamental misunderstanding of the realities of trafficking and forced labor.

This Court has long recognized that companies who intentionally exploit a market cannot escape the power of the forum's courts through formalities. *See Keeton* 465 U.S. 770 at 782; *Ford Motor Co.*, 141 S. Ct. at 1017. Thus, it is well within the recognized limits of the Due Process Clause to hold a foreign supplier liable for the human rights violations committed in the production of goods targeted for the United States. *See Asahi Metal Indus. Co. v. Superior Ct. of California, Solano Cnty.*, 480 U.S. 102, 112 (1987) (conduct such as "designing the product for the market in the forum" shows purposeful direction).

Such contacts go far beyond the mere “placement of a product into the stream of commerce,” *id.*, and they are not “random, isolated, or fortuitous,” *Ford Motor Co.*, 141 S. Ct. at 1025 (quoting *Keeton* 465 U.S. at 774). Nothing more is required, and the Ninth Circuit’s holding that a plaintiff must suffer foreseeable harm in the U.S. has no basis in Due Process Clause jurisprudence.

Moreover, the Ninth Circuit’s consideration of the relevant “harm” is unnecessarily restrictive. *First*, the court erred in failing to consider the harm petitioners suffered through the creation and maintenance of a market within the United States for the goods produced with their forced labor. A plaintiff need not be physically within a forum to experience harm there. Indeed, a plaintiff need not have contact with the forum at all. This Court does not “require[] a plaintiff to have ‘minimum contacts’ with the forum State before permitting that State to assert personal jurisdiction over a nonresident defendant. On the contrary, [it has] upheld the assertion of jurisdiction where such contacts were entirely lacking.” *Keeton*, 465 U.S. at 779 (citing *Perkins v. Benguet Mining Co.*, 342 U.S. 437 (1952)).

This is particularly important in the context of forced labor and labor trafficking where the global markets facilitate, enable, and encourage transnational exploitation. That dynamic is evident here. Petitioners were trafficked from their home country to produce goods for respondents. Respondents then forced petitioners to produce goods designed and intended to be sold in the United States. The demand for forced labor abroad is intrinsically tied to the demand for goods from consumers within the United States. Respondents’ desire to take

advantage of the U.S. market for shrimp spurred their abuse of petitioners. As this Court recognized in *Keeton*, the physical location of a plaintiff is not the only location harm is suffered, 465 U.S. at 780, and the domestic market for shrimp is inextricably linked to petitioners' injuries.

Second, the Ninth Circuit's definition of harm fails to consider the broader injuries forced labor and trafficking cause to the integrity of and competition within the United States market. For example, U.S. corporations that do not use forced labor in their supply chain must struggle to compete with lower priced goods of the less scrupulous companies who cut costs through forced labor. See *Rodriguez*, 29 F.4th at 716 n.5 (“§ 1589(b) . . . criminalizes knowing benefit, financial or otherwise, from participation in a venture that has provided or obtained forced labor. Section 1589(b), like § 1589(a), protects against involuntary servitude. . . . Section 1589(b) also protects commercial entities that decline to benefit from forced labor and may be harmed by competition from products or services garnering implicit subsidies from forced labor.”); The White House, *2021 National Action Plan to Combat Human Trafficking* at 15 (“Globally and in the United States, forced labor and associated harmful employment practices hide the true cost of labor and subvert the legitimate job market, such as displacing American workers, driving down wages, and corrupting the domestic and global economy. These practices create an uneven playing field for responsible businesses that invest in measures to prevent forced labor in their product supply chains.”).⁸ Nor is this a hypothetical harm in the

8. Available electronically <https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf> (last accessed November 19, 2022).

instant case. Petitioners presented the court with a declaration from the President of the Louisiana Shrimp Association, in which he detailed the effects shrimp produced with forced labor in Thailand has had on the market in the United States, including significant price declines resulting in unfair prices with which Louisiana shrimpers struggle to compete. Declaration of Acy Cooper, ¶¶ 4-8.

United States consumers are also harmed by the inability to avoid goods tainted by slave labor. These goods are all but impossible for end-use consumers to distinguish from their untainted counterparts, and, thus, citizens are forced to unwittingly support the oppressive system. Sarah Dadush, *The Law of Identity Harm*, 96 Wash. U.L. Rev. 803, 804–05 (2019).

Put simply, the Ninth Circuit's ruling failed to appreciate the true scope of the harms caused by forced labor and labor trafficking. But Congress understood these harms, and it acted repeatedly, intentionally and with bipartisan support to enact a comprehensive statutory scheme to fight against these harms. After extensive hearings and research, Congress adopted a statutory scheme, which included extraterritorial jurisdiction, venture liability and a civil remedy, because it recognized that these were essential tools in the fight against human trafficking. The Ninth Circuit's restrictive view of the relevant injuries is not only contrary to the law but does real harm to the TVPRA and the fight against human trafficking.

CONCLUSION

The Ninth Circuit's decision misinterprets the due process principles governing the power of courts over foreign defendants and conflicts with decisions of this Court and other Courts of Appeals. The court's decision undermines the effectiveness of the TVPRA and severely hampers efforts to combat the global problem of human trafficking. The petition for a writ of certiorari should be granted.

Respectfully submitted.

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