

## MICHIGAN LAWYERS IN THE FIGHT AGAINST SLAVERY

BY E. CHRISTOPHER JOHNSON JR.

**2013** marks the 150th anniversary of the Emancipation Proclamation. However, as noted by President Obama when he declared January as National Slavery and Human Trafficking Prevention Month, “[T]he Emancipation Proclamation...and the 13th Amendment...stand as testaments to the gains we have made in pursuit of freedom and justice for all, and they remind us of the work that remains to be done.”<sup>1</sup>

Last year, God gave my wife, Rhonda, and me a life-changing wake-up call in the words of Isaiah 1:17 to “...seek justice [and] defend the oppressed...” when we came face to face with slavery in the red-light district of Mumbai (formerly Bombay), India on a mission trip. Back home, I discovered that slavery is also alive and well in Michigan. Modern-day slavery, or human trafficking, is either a “commercial sex act” or the “recruitment, harboring, transportation, provision, or obtaining of a person for labor or services” induced by the use of force, fraud, or coercion.<sup>2</sup> There are more slaves today (some say as many as 27 million) than ever before—even more than during the 400 years of the trans-Atlantic slave trade that brought my ancestors to this country.<sup>3</sup> Slavery is a major criminal enterprise<sup>4</sup> and a \$32 billion industry<sup>5</sup>—second only to drug trafficking. President George W. Bush summed it up well when he referred to it as “one of the worst offenses against human dignity.”<sup>6</sup> I could not agree more with our last two presi-

dents that we have a great deal of work to do to end this scourge on humanity.

### Responding to Slavery in Michigan

As noted by Michigan Attorney General Bill Schuette,

Every day across America, and right here in Michigan, men, women and children are bound by the chains of modern-day slavery. Our Constitution’s 13th amendment bans slavery in all its forms, but human traffickers use force, fraud and coercion to hide their victims in the shadows. Our own family members are forced into prostitution, domestic servitude and other forms of labor. Even more alarming, approximately 40 percent of human trafficking cases involve the sexual abuse of a child.<sup>7</sup>

In April 2012, the Attorney General’s office successfully prosecuted the first human-trafficking case under Michigan’s new human-trafficking law.<sup>8</sup> Sedrick Mitchell, also known as “Gruesome,” was convicted of multiple counts relating to the prostitution of two young Michigan girls. Mitchell had forced the two girls, 14 and 15 years old, to prostitute themselves in Detroit, beating them if they did not earn him enough money.<sup>9</sup> Assistant Attorney General Kelley Carter, who serves with me on the Michigan Human Trafficking Task Force (Task Force),<sup>10</sup> is Schuette’s lead prosecutor

**FAST FACTS:**

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**The International Labour Organization estimates that 12.3 million children, women, and men are currently trapped in forced labor and many of them may be in the supply chains of products we all eat, wear, or otherwise use.**

**The growing consumer awareness of the impact of slavery in our daily lives demonstrates that success awaits a business that invests in fair labor.**

of crimes defined under the human-trafficking law. She is now working on a second case: a Southfield prostitution ring known as "Detroit Pink," which exploits girls as young as 15.<sup>11</sup>

Schuette has also formed the state's first Human Trafficking Unit on his staff under the leadership of Chief Deputy Attorney General Carol Isaacs. In addition to the cases prosecuted by Carter, this unit is working to educate law enforcement and the general public about the growing crime of human trafficking.

Barbara McQuade, the United States Attorney for the Eastern District of Michigan, has also made human trafficking a priority. In a recent statement to me, she mentioned that the last defendant in a nine-member international conspiracy to compel Eastern European women to work in exotic dance clubs in the Detroit metropolitan area was recently sentenced. The conspiracy recruited women in the Ukraine, facilitated their illegal entry into the United States, and then harbored them for commercial advantage and private financial gain. The lead defendant, Aleksandr Maksimenko, was sentenced to 14 years in prison after pleading guilty of involuntary servitude and immigration and money laundering conspiracies. Maksimenko was ordered to reimburse the victims of the conspiracy a total of \$1,570,450 in earnings they had handed over to the conspirators. In addition, between 2007 and 2010, the United States Attorney's office convicted Robert "Blue Diamond" Young (25-year sentence), Dennis "Detroit Slim" Paige (13-year sentence), Robert "Motor City Mink" Daniels (35-year sentence), and eight others for sex-trafficking crimes related to minors. The United States Attorney's office participates in the Task Force to share information and coordinate efforts relating to human-trafficking investigations.<sup>12</sup>

University of Michigan Law School Professor Bridgette Carr, another member of the Task Force, is a leading human-trafficking legal expert and the founder of the nation's first Human Trafficking Clinic.<sup>13</sup> Students at the clinic help trafficking victims by representing them on criminal law and immigration issues, among others.<sup>14</sup> Elizabeth Campbell, staff attorney, explains that approximately 80 percent of the clinic's clients are labor-trafficking victims. Often, they're foreign nationals who follow opportunities to the United States seeking the promise of a better life. But when they arrive, they find themselves in debt bondage, being told that they owe a large sum of money to the trafficker, who controls every aspect of their lives.<sup>15</sup> Carr is also educating the Task Force and others about the need to update Michigan's human-trafficking law to better protect child victims of human trafficking.<sup>16</sup>

## Response at the National Level

Schuette is also part of the Leadership Council of the Pillars of Hope<sup>17</sup> initiative led by the president of the National Association of Attorneys General (NAAG), Washington Attorney General Rob McKenna. The NAAG recently indicated that the initiative will continue beyond McKenna's term, recognizing the desperate need to stop human trafficking.<sup>18</sup>

Another State Bar of Michigan member, Ambassador at Large Luis CdeBaca, is the top federal antitrafficking official, heading the State Department's Trafficking in Persons (J/TIP) Office, which leads the global fight against slavery. Central to the effort is the annual Trafficking in Persons (TIP) Report that details global antitrafficking efforts and ranks countries according to antislavery efforts.<sup>19</sup> And Congress is currently considering the reauthorization of the Trafficking Victims Protection Act (TVPA),<sup>20</sup> which, among other things, provides funding to the J/TIP Office. The J/TIP Office is just one of numerous governmental agencies that are part of the President's Interagency Task Force to Monitor and Combat Trafficking in Persons, which also includes the United States Secretaries of Labor, Health and Human Services, Defense, Homeland Security, and Transportation and the United States Attorney General.

An additional bill is before the United States House of Representatives: the Business Transparency on Trafficking and Slavery Act,<sup>21</sup> modeled after California's Transparency in Supply Chain Act.<sup>22</sup> Both laws require companies to report antislavery supply-chain efforts such as verifying supply chains to address trafficking/slavery, auditing suppliers to assess their compliance with company standards on trafficking/slavery, and requiring certification that product materials meet antitrafficking standards. But the federal bill goes further to include child labor, require disclosure of companies' antitrafficking policy (if they have one), and require information to be published online and submitted to the Securities and Exchange Commission.<sup>23</sup>

## Slavery in Supply Chains

As a corporate lawyer, the fact that slavery exists in corporate supply chains is unconscionable. Partially, this is driven by the demand for cheap goods and services, which has led some corporations to aggressively exact lower prices from their suppliers. This, along with globalization, makes exploitation of workers much more common and accepted. In many instances this is accomplished through corrupt labor sourcing practices employed by labor brokers who mislead workers. The result is that all corporate supply chains are susceptible to the taint of slavery.<sup>24</sup> The International Labour Organization estimates that 12.3 million children, women, and men are currently trapped in forced labor and many of them may be in the supply chains of products we all eat, wear, or otherwise use.<sup>25</sup> You can check this out for yourself by visiting <http://slaveryfootprint.org/> to see how many slaves are working for you. By the way, I was embarrassed to discover I have 71 slaves working for me, so I have some work to do!

In recent testimony before Congress, Ambassador CdeBaca stated that many raw materials from cotton, chocolate, and coffee to steel, rubber, and tin are produced with forced labor, so we all use slave-made products, and even reputable corporations profit

from slavery. He added that this is why companies must focus on the front end of their supply chains in the places from which they obtain raw materials to begin the fight against slavery.<sup>26</sup>

Supply-chain monitoring identifies slavery in any form—whether in manufacturing, harvesting of raw materials, or commercial sex. A number of new initiatives in this area are emerging,<sup>27</sup> including the nearly 600 companies that have adopted the Luxor Implementation Guidelines, endorsing a new way of looking at forced-labor supply-chain monitoring and labor sourcing.<sup>28</sup> CdeBaca noted that these efforts can help reduce demand, and without demand the profit motive disappears.<sup>29</sup>

## Growing Litigation and Regulatory Risk

Since 2008, the TVPA has provided that those who profit from trafficking—even through “reckless disregard”—are criminally responsible and subject to civil liability.<sup>30</sup> The Alien Tort Statute (ATS), allowing aliens to bring tort actions in United States courts for violations of international law,<sup>31</sup> creates another litigation risk. For example, in *Adbikari v Daoud & Partners*, corporations were accused of labor violations. The court held that human trafficking and forced-labor violations are actionable under the ATS.<sup>32</sup> However, this position is being challenged in *Kiobel v Royal Dutch Petroleum Co*, now before the United States Supreme Court.<sup>33</sup>

In addition, a federal judge in California was the first to grant class action status to a human-trafficking case involving 350 Filipino teachers, demonstrating that the provisions of the TVPA can apply to a class of victims.<sup>34</sup> Add this to the supply-chain-transparency legislation already passed in California and being considered by other states (recall that NAAG is involved), and also being considered in Congress, and it is clear that the law in this area is developing in a way that creates potentially significant risk to corporations that do not guard against human trafficking.

## The Business Case for Corporate Responsibility

Given the foregoing, it should be clear that a company without an effective compliance program to detect and prevent human trafficking in its supply chain has an increased risk of criminal and civil liability. The criminal liability of corporations for the misdeeds of directors, officers, and even lower-level employees and independent contractors (such as labor brokers) is fairly well established in American jurisprudence.<sup>35</sup> In the trafficking arena, liability can arise, as mentioned earlier, for a corporation that profits from trafficking—even through “reckless disregard,” such as in the case of a corporation with slavery or forced labor in its supply chain.<sup>36</sup> However, this liability can be mitigated under the federal sentencing guidelines for organizations if the corporation proves it had an effective compliance program in place to prevent human trafficking in its supply chain.<sup>37</sup> This certainly creates a business case for fighting human trafficking by either (1) maintaining supply-chain stability and building a positive reputation through ensuring slave-free supply chains or (2) avoiding a negative reputation, prosecution, litigation, or supply-chain disruption by failing to do so.

Aside from the regulatory/litigation risk, corporations are also being held accountable in the court of public opinion for exploitation that occurs in their overseas business operations.<sup>38</sup> For example,

there is continuing pressure on Apple, Inc.; The Hershey Company; and other companies for alleged abuses in this area.<sup>39</sup> Conversely, taking steps to avoid such violations can help build shareholder trust and consumer loyalty while avoiding costly litigation.<sup>40</sup>

The growing consumer awareness of the impact of slavery in our daily lives demonstrates that success awaits a business that invests in fair labor. It's wrong to assume consumers won't pay more for fair trade goods.<sup>41</sup> A study in November 2005 by Harvard economists demonstrated that a 10 to 20 percent price premium could be acceptable to consumers from identifiable anti-trafficking efforts on the part of a retail brand.<sup>42</sup> Companies are investing in fair labor practices and labeling products accordingly to improve conditions,<sup>43</sup> and consumers are buying products they know are fairly made. Similarly, organizations such as the Interfaith Center on Corporate Responsibility are challenging publicly held companies to address forced child labor and human trafficking for sexual and economic purposes.<sup>44</sup>

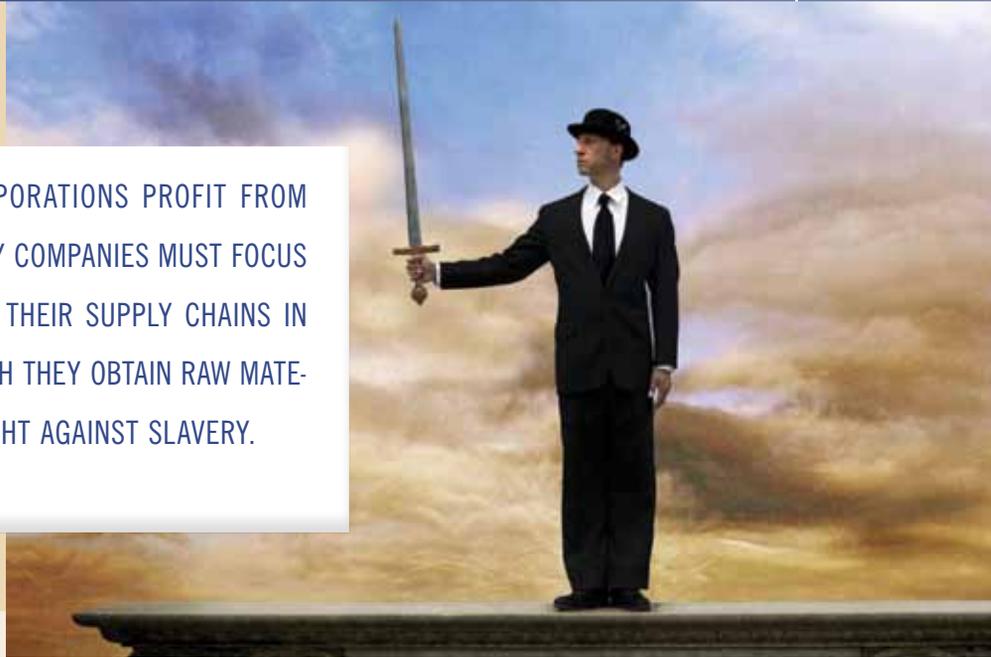
This carrot-and-stick approach is similar to what we used to advance diversity at General Motors North America when I was its general counsel. We argued that our nation's increased diversity, its effects on consumers, and the lack of diversity in the legal profession<sup>45</sup> created a strong business case for increased diversity among GM's outside counsel. Through a number of initiatives, we caused our outside counsel to significantly increase ethnic and gender diversity and made it clear that those who followed suit would be rewarded with more business, while those who did not might lose business. It didn't matter whether the positive or negative suggestion led to the change. Firms knew the importance of diversity to GM, and diversity increased. As we used to say at GM, “What gets measured, gets done.”

## A New Abolitionist Movement

So where does this leave us? For starters, a corporate lawyer's role now includes discerning the risks of noncompliance with antitrafficking laws and the rule of law around the world. We don't have to substitute the public good for shareholder return. Instead, we need to help corporate boards and CEOs recognize the risks and rewards involved in antislavery compliance. Certainly, slavery is a despicable injustice to be righted by widespread compliance with the rule of law. In addition, a legitimate business case can be made that profiting from slavery is an unacceptable reputational, litigation, and regulatory risk. If corporations do not take action voluntarily, then workers, consumers, or other lawyers will hold them accountable. The choice is to lead or follow. As Ambassador CdeBaca noted, “You don't want to wait until the plaintiff's lawyer shows up at the door.”<sup>46</sup>

During the Civil Rights Movement, boycotts became part of our national heritage. Consider the farmworker Coalition of Imnokalee Workers (CIW) as a present-day example in the human-trafficking arena. The CIW, composed of Florida labor-trafficking survivors, launched the nation's first farmworker boycott of a major fast-food company, accusing Taco Bell and other corporations of exploitation. Taco Bell eventually agreed to ongoing restitution payments to workers and to double the profit percentage workers receive. Taco Bell also agreed to an enforceable code of conduct for fast-food suppliers, including incentives and the creation of an investigative body. The CIW has since reached similar

EVEN REPUTABLE CORPORATIONS PROFIT FROM SLAVERY....THIS IS WHY COMPANIES MUST FOCUS ON THE FRONT END OF THEIR SUPPLY CHAINS IN THE PLACES FROM WHICH THEY OBTAIN RAW MATERIALS TO BEGIN THE FIGHT AGAINST SLAVERY.



agreements with McDonald's Corporation, Burger King Corporation, and Subway.<sup>47</sup>

Every lawyer can have a role. Ask, What is my company doing to police its supply chain? What am I buying as a consumer?<sup>48</sup> What corporations do I invest in?<sup>49</sup> Learn about slavery and tell others. Call the human-trafficking hotline at (888) 373-7888 to report suspicious activity or learn more about human trafficking. Represent survivors of trafficking. Advocate along with Bridgette Carr for legislative reform of Michigan and other state and national laws. Charge crimes under the human-trafficking law, as Attorney General Bill Schuette does. Volunteer with or contribute to any one of the national or state efforts in this area listed on the website of the Michigan Abolitionist Project, whose leadership team both my wife and I have joined.<sup>50</sup> A number of law schools have initiatives in this area. In particular, the Modern Abolitionist Legal Society at Michigan State University College of Law, led by Sara Warpinski, another Task Force member, identifies areas in which attorneys can help in this fight.<sup>51</sup> The American Bar Association, through its Rule of Law Initiative, has a long history of antitrafficking initiatives, which will be expanded under the leadership of ABA President-Elect Laurel Bellows, who has identified the fight against human trafficking as one of her presidential initiatives.<sup>52</sup>

Personally, I intend to follow the call I heard from God in Mumbai to eliminate slavery as my primary mission in life. The means will be varied and will include membership on the Task Force, the Michigan Abolitionist Project, the ABA activities noted above, raising awareness through articles like this or events such as a recent one held at Thomas M. Cooley Law School,<sup>53</sup> or attacking slavery in supply chains through a new Center on Corporate Responsibility that I am forming.

Like me, I hope you find the things I have described in this article not only horrific, but also an affront to the rule of law that we, as lawyers, swore to uphold. Whether it is happening next door or halfway around the world, as Dr. Martin Luther King Jr. said, "Injustice anywhere is an affront to justice everywhere."<sup>54</sup> So where will you stand in the fight? All Michigan lawyers can have a strong antislavery voice. If we join together, by the time the 150th anniversary of the Emancipation Proclamation comes around, we will have freed even more slaves, helped more human-trafficking

victims recover from their bondage, and prevented additional people from becoming entangled in the web of human trafficking. Therefore, now is the time to become an abolitionist, so we can celebrate not only the historic signing of the Emancipation Proclamation, but also these current-day victories to guarantee the freedom and liberty promised by it. ■



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*He would like to thank the following for their assistance with this article: Ambassador Luis CdeBaca and his staff at J/TIP, particularly Amy O'Neill Richard, Kim Natoli, and Mai Shiozaki; U.S. Attorney for the Eastern District of Michigan Barbara McQuade; Michigan Attorney General Bill Schuette and his staff; Bridgette Carr and Elizabeth Campbell from the University of Michigan Trafficking Clinic; Cooley Associate Dean Nelson Miller; librarian Helen Levenson; students Sarah Pixler, Alex Ruggieri, and Laura Hartless; and his fellow panel members at the NAAG Summit, Stephanie Richard, Shawn MacDonald, and Steve Lippman. He also wants to thank his wife, Rhonda, for her support and guidance during the writing of this article.*

## FOOTNOTES

1. The White House Office of the Press Secretary, *Presidential Proclamation—National Slavery and Human Trafficking Prevention Month, 2012*, available at <<http://www.whitehouse.gov/the-press-office/2011/12/30/presidential-proclamation-national-slavery-and-human-trafficking-prevent>>. All websites cited in this article were accessed June 7, 2012.
2. United States Department of State, *2011 Trafficking in Persons Report*, June 2011, p 8, available at <<http://www.state.gov/documents/organization/164452.pdf>>.
3. UN News Centre, *UN and partners launch initiative to end "modern slavery" of human trafficking* <<http://www.un.org/apps/news/story.asp?NewsID=22009>>; Bales, *Disposable People: New Slavery in the Global Economy* (Berkeley: University of California Press, 1999), pp 8–9.

4. See Shelley, *Human Trafficking: A Global Perspective* (Cambridge: Cambridge University Press, 2010), p 2.
5. UN News Centre, n 3 *supra*.
6. President George W. Bush, *The National Training Conference on Human Trafficking*, July 16, 2004, available at <<http://www.gpo.gov/fdsys/pkg/PPP-2004-book2/pdf/PPP-2004-book2-doc-pg1350.pdf>>.
7. Attorney General Bill Schuette, *Schuette Statement on National Human Trafficking Awareness Day*, available at <[http://www.michigan.gov/ag/0,4534,7-164-46849\\_47203-269042--,00.html](http://www.michigan.gov/ag/0,4534,7-164-46849_47203-269042--,00.html)>.
8. Attorney General Bill Schuette, *Gruesome: Guilty* <<http://www.michigan.gov/ag/0,4534,7-164-46849-274256--,00.html>>.
9. *Id.*
10. The Task Force is a collaborative effort of more than 60 law enforcement, victim services providers, and community entities to prevent the trafficking of persons within the state of Michigan, pursue prosecution of perpetrators, and protect and rehabilitate trafficking victims. It is led by Jane White, a former Lansing police officer and director of the Criminal Justice and Law Center, Mid-Michigan Police Academy. Michigan Human Trafficking Task Force, *Mission* <<http://www.humantrafficking.msu.edu/>>.
11. Attorney General Bill Schuette, n 8 *supra*.
12. Statement of Barbara L. McQuade, United States Attorney for the Eastern District of Michigan, made to the author on May 3, 2012.
13. University of Michigan Law School, *Human Trafficking Clinical Program* <<http://www.law.umich.edu/clinical/humantraffickingclinicalprogram/Pages/default.aspx>>.
14. Mejia & White, *Human trafficking, modern-day slavery* <<http://michiganradio.org/post/human-trafficking-modern-day-slavery>>.
15. *Id.*
16. Concerning the weakness of Michigan's laws, see Shared Hope International, *Protected Innocence Initiative: Michigan Report Card* <[http://www.sharedhope.org/Portals/0/Documents/Report\\_cards\\_1229/ReportCards\\_all%20states\\_FINAL\\_MI.pdf](http://www.sharedhope.org/Portals/0/Documents/Report_cards_1229/ReportCards_all%20states_FINAL_MI.pdf)>.
17. The Four Pillars are (1) making the case, (2) holding traffickers accountable, (3) mobilizing communities to care for victims, and (4) public awareness and issue advocacy. National Association of Attorneys General, *Pillars of Hope: Attorneys General Unite Against Human Trafficking* <[http://www.naag.org/assets/files/pdf/meetings/2012\\_summit/Pillars\\_of\\_Hope\\_One-Page-9-7-11.pdf](http://www.naag.org/assets/files/pdf/meetings/2012_summit/Pillars_of_Hope_One-Page-9-7-11.pdf)>.
18. See generally National Association of Attorneys General, *Presidential Initiative Summit in Seattle Shines Spotlight on Human Trafficking*, NAAGazette, April 27, 2012, available at <<http://www.naag.org/assets/files/pdf/gazette/6.3-4.Gazette.pdf>>.
19. Trafficking in Persons Report, June 2011, n 2 *supra*.
20. PL 106-386, 114 Stat 1464. The Trafficking Victims Protection Reauthorization Act of 2011, HR 2830 (2011), would renew PL 106-386 and is available at <<http://thomas.loc.gov/cgi-bin/query/z?c112:H.R.2830>>.
21. Business Transparency on Trafficking and Slavery Act, HR 2759 (2011), available at <<http://thomas.loc.gov/cgi-bin/query/z?c112:H.R.2759>>.
22. Cal Civ Code 1714.43 (2010).
23. HR 2759, n 21 *supra*; see also Remarks of Stephanie Richard, Coalition to Abolish Slavery & Trafficking, at the Presidential Initiative Summit of the National Association of Attorneys General, March 29, 2012, available at <[http://www.naag.org/assets/files/pdf/meetings/2012\\_summit/THU/PANEL.Public%20Response%20-%20Corporations%20Taking%20the%20Lead%20in%20Fighting%20Human%20Trafficking.pdf](http://www.naag.org/assets/files/pdf/meetings/2012_summit/THU/PANEL.Public%20Response%20-%20Corporations%20Taking%20the%20Lead%20in%20Fighting%20Human%20Trafficking.pdf)>.
24. See Bales and Soodalter, *The Slave Next Door* (University of California Press, 2009), p 146.
25. International Labour Organization, *Forced Labour* <<http://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>>.
26. Ambassador Luis CdeBaca, Testimony Before the Subcommittee on Africa, Global Health and Human Testimony of the House Committee on Foreign Affairs (June 13, 2011), available at <<http://www.state.gov/j/tip/rls/rm/2011/166093.htm>>.
27. E.g., Verite's "Help Wanted" Toolkit <<http://www.verite.org/>>; Microsoft and Manpower's memberships in End Human Trafficking Now! and the development and use of an excellent eBusiness Learning Tool <[http://www.endhumantraffickingnow.com/e-learning\\_tool\\_fight\\_human\\_trafficking.php](http://www.endhumantraffickingnow.com/e-learning_tool_fight_human_trafficking.php)>; the American Apparel and Footwear Association's representation of more than 800 brands that have signed a pledge not to source cotton from Uzbekistan <<http://www.wewear.org/aafa-on-the-issues/category/?CategoryId=38>>; and the Business Coalition Against Trafficking, members of which include Ford Motor Company, Delta Air Lines, Inc., Microsoft Corporation, Exxon Mobil Corporation, Carlson Companies, LexisNexis Group, and others <<http://blogs.state.gov/index.php/site/entry/bcat>>. The Automotive Industry Action Group is also actively reviewing this issue <<http://www.aiag.org/staticcontent/committees/workgroup.cfm?group=CRTC&FC=CR&grp=WCOC#T91YcbBFESE>>.
28. End Human Trafficking Now!, *Luxor Implementation Guidelines to the Athens Ethical Principles: Comprehensive Compliance Programme for Businesses*, available at <[http://www.unglobalcompact.org/docs/issues\\_doc/human\\_rights/Resources/Luxor\\_Implementation\\_Guidelines\\_Ethical\\_Principles.pdf](http://www.unglobalcompact.org/docs/issues_doc/human_rights/Resources/Luxor_Implementation_Guidelines_Ethical_Principles.pdf)>.
29. CdeBaca testimony, n 26 *supra*.
30. 18 USC 1591, 1595, and 1599.
31. 28 USC 1350.
32. *Adhikari v Daoud & Partners*, 697 F Supp 2d 674, 679 (SD Tex, 2009).
33. *Kiobel v Royal Dutch Petroleum Co*, 642 F3d 268 (CA 2, 2011), cert gtd 565 US \_\_\_; 132 S Ct 472; 181 L Ed 2d 292 (2011). The United States Court of Appeals for the Second Circuit held that there was no jurisdiction over corporations under the ATS. This created a circuit split with the Eleventh, Ninth, Seventh, and DC Circuits. The United States Supreme Court granted certiorari and heard arguments in February 2012 to decide whether there is jurisdiction over corporations under customary international law. An opinion is expected by summer 2012.
34. *Tanedo v East Baton Rouge Parish Sch Bd*, unpublished opinion of the US District Court for the Central District of California, issued December 12, 2011 (Case No. LA CV10-01172); 2011 WL 7095434; see also Southern Poverty Law Center, *Precedent-Setting Decision Issued in SPLC Teacher Trafficking Case* <<http://www.splcenter.org/get-informed/news/precedent-setting-decision-issued-in-splc-teacher-trafficking-case-0>>.
35. See, e.g., Brickley, Kathleen F., Perspectives on Corporate Criminal Liability (January 1, 2012). Encyclopedia of Criminology & Criminal Justice, Springer, 2012; Washington University in St. Louis Legal Studies Research Paper No. 12-01-02. Available at SSRN: <<http://ssrn.com/abstract=1980346>>.
36. See n 30 *supra*.
37. United States Sentencing Commission, *An Overview of the Organizational Guidelines* <[http://www.uscc.gov/Guidelines/Organizational\\_Guidelines/ORGOVERVIEW.pdf](http://www.uscc.gov/Guidelines/Organizational_Guidelines/ORGOVERVIEW.pdf)>.
38. See, e.g., *Presbyterian Church of Sudan v Talisman Energy, Inc*, 374 F Supp 2d 331, 335 (SD NY, 2005) and *Sinaltrainal v Coca-Cola Co*, 256 F Supp 2d 1345 (SD Fla, 2003).
39. See change.org, *Human Trafficking* <<http://www.change.org/topics/humantrafficking>>.
40. See Dellinger, *Corporate social responsibility: A multifaceted tool to avoid Alien Tort Claims Act litigation while simultaneously building a better business reputation*, 40 Cal W Int'l LJ 55 (2009).
41. See n 4 *supra* at 313, citing Vogel, *The Market for Virtue and the Potential and Limits of Corporate Social Responsibility* (Washington, DC: Brookings Institution Press, 2005).
42. Hiscox and Smyth, *Is There Consumer Demand for Improved Labor Standards? Evidence from Field Experiments in Social Product Labeling* <<http://dev.wcfia.harvard.edu/sites/default/files/HiscoxSmythND.pdf>>.
43. CdeBaca testimony, n 26 *supra*.
44. See Interfaith Center on Corporate Responsibility, *Corporate Engagement in Action* <<http://www.iccr.org/issues/>>.
45. See, e.g., Fershtman, *Diversity: A little more conversation, a little more action*, 91 Mich B J 14 (January 2012).
46. CdeBaca, *How Individuals, Faith-Based Communities and Investors Can End Modern Slavery* (November 21, 2011), available at <<http://vimeo.com/32471501>>.
47. Coalition of Immokalee Workers <<http://ciw-online.org/>>.
48. See Fair Trade Resource Network, *Home* <<http://www.fairtraderesource.org/>>; Slavery Footprint, *How Many Slaves Work for You?* <<http://www.slaveryfootprint.org/>>; and The Not for Sale Campaign, *Free2Play* <<http://www.notforsalecampaign.org/free2play/>>.
49. Interfaith Center on Corporate Responsibility, *40 Years of Faithful Investments in People and Planet* <<http://www.iccr.org>>.
50. To contribute or volunteer, visit Michigan Abolitionist Project <<http://www.michiganabolitionistproject.org/>>.
51. Modern Abolitionist Legal Society <<http://www.law.msu.edu/students/student-org-profile.php?id=104>>.
52. See ABA Rule of Law Initiatives, available at <[http://www.americanbar.org/advocacy/rule\\_of\\_law/thematic\\_areas/criminal\\_law\\_anti\\_human\\_trafficking.html](http://www.americanbar.org/advocacy/rule_of_law/thematic_areas/criminal_law_anti_human_trafficking.html)>, and Laurel Bellows's remarks before the ABA House of Delegates, available at <<http://www.abanow.org/2011/08/american-bar-association-names-illinois-lawyer-laurel-bellows-president-elect/>>.
53. Thomas M. Cooley Law School, *Cooley Raises Awareness and Explores Solutions to Human Trafficking* <[http://www.cooley.edu/news/2012/cooley\\_raises\\_awareness\\_and\\_explores\\_solutions\\_to\\_human\\_trafficking.html](http://www.cooley.edu/news/2012/cooley_raises_awareness_and_explores_solutions_to_human_trafficking.html)>.
54. The Reverend Martin Luther King Jr., *Letter from a Birmingham Jail*, April 16, 1963, available at <[http://www.africa.upenn.edu/Articles\\_Gen/Letter\\_Birmingham.html](http://www.africa.upenn.edu/Articles_Gen/Letter_Birmingham.html)>.