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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

v.

**LAURA EVET LAMBDEN and BEN
ALLEN RIGGS,**

Defendants.

Case No. 3:13-cr-00294-JO

**BRIEF OF *AMICUS CURIAE* SHARED
HOPE INTERNATIONAL IN SUPPORT
OF SENTENCING**

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FEDERAL RULE OF APPELLATE PROCEDURE 29(5)

DISCLAIMER

Counsel of Record for Shared Hope International authored this brief in part, with assistance from the Senior Director of Shared Hope International.

INTRODUCTION

Shared Hope International (“Shared Hope”) respectfully submits this Brief of Amicus Curiae, pursuant to Rule 29 of the Federal Rules of Appellate Procedure to support the imposition of a sufficiently serious sentence for the offense of commercial sexual exploitation of a child.

INTEREST OF AMICUS CURIAE

Shared Hope International was established in 1998 to assist victims of sex trafficking and to affect policy and practices to eradicate the crime at both the federal and state levels. Through application-based research Shared Hope International has examined the impact of the commercial sex buyer on the growth and prevalence of child sex trafficking. Shared Hope International is uniquely positioned to inform the Court regarding issues relevant to this case.

STATEMENT OF THE CASE

Defendant Riggs pleaded guilty to the Mann Act, 18 U.S.C. § 2421, admitting that “on or about September 22, 2012, in the District of Oregon and elsewhere, he knowingly caused co-defendant Laura Lambden to transport a person (M.F.), in interstate commerce from Vancouver, Washington to his residence in Oregon City, Oregon, while having the intent that M.F. engage in prostitution. Defendant further admits that he engaged in a commercial sexual act with M.F.” The more serious charges of Sex Trafficking of a Minor (which would have required a

mandatory minimum sentence of 10 years in prison) and Production of Child Pornography (which would have required a mandatory minimum sentence of 15 years in prison) were dismissed under the terms of the plea agreement. The U.S. Attorney's Office agreed to a sentencing range of 46-57 months' imprisonment with a recommendation that the Court sentence the defendant at the high end of the applicable guideline range: 57 months in prison, followed by three years of supervised release.

ARGUMENT

Charging buyers with federal sex trafficking crimes is beginning to happen in those jurisdictions that recognize the fundamental role the buyer of sex acts plays in a sex trafficking crime.¹ In this way, the federal prosecutors and courts are providing leadership for state and local

¹ See, e.g., Indictment at 1, *U.S. v. Gollither*, No. 5:13-cr-50106 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Murphy*, No. 5:13-cr-50103 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Miller*, No. 5:13-cr-50102 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Fox, Jr.*, No. 5:13-cr-50094 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Falk*, No. 5:13-cr-50093 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Gravens*, No. 5:13-cr-50101 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Aguillar*, No. 5:13-cr-50095 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Larive, Jr.*, No. 5:13-cr-50100 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Austin*, No. 5:13-cr-50105 (D.S.D. Aug. 13, 2013); Indictment at 1, *U.S. v. Clyde*, No. 5:14-cr-50067 (D.S.D. Aug. 13, 2014); Indictment at 1, *U.S. v. Curaba*, No. 5:14-cr-50065 (D.S.D. Aug. 13, 2014); Indictment at 1, *U.S. v. Fielding*, No. 5:14-cr-50064 (D.S.D. Aug. 13, 2014); Indictment at 1, *U.S. v. Holden*, No. 5:14-cr-50068 (D.S.D. Aug. 13, 2014); Indictment at 1, *U.S. v. Thymaras*, No. 5:14-cr-50063 (D.S.D. Aug. 13, 2014); Information at 1, *U.S. v. Driskill*, No. 3:13-cr-30179 (S.D. Ill. Aug. 12, 2013); Indictment at 2, *U.S. v. Sacco*, No. 3:08-cr-00077 (N.D. NY Feb 15, 2008); Indictment at 5, *U.S. v. Payer*, No. 4:10-cr-40081 (D.S.D. Aug. 3, 2010); Indictment at 2, *U.S. v. Albers*, No. 4:09-cr-00078 (W.D. Mo. Mar. 10, 2009); Indictment at 2, *U.S. v. Childers*, No. 4:09-cr-00079 (W.D. Mo. Mar. 10, 2009); Indictment at 2, *U.S. v. Cockell*, No. 4:09-cr-00080 (W.D. Mo. Mar. 10, 2009); Indictment at 2, *U.S. v. Oflyng*, No. 09-00084-01-CR-W-SOW (W.D. Mo. Mar. 10, 2009); Indictment at 1-2, *U.S. v. Doerr*, No. 4:09-cr-00031-FJG (W.D. Mo. Feb. 3, 2009); Indictment at 2, *U.S. v. Johnson*, No. 4:09-cr-00034 (W.D. Mo. Feb. 3, 2009); Indictment at 2, *U.S. v. Mikoloyck*, No. 4:09-cr-00036-GAF (W.D. Mo. Feb. 3, 2009); Indictment at 1, *U.S. v. Krogman*, No. 4:11-cr-40017 (D.S.D. Mar. 2, 2011); *U.S. v. Bonestroo*, 2012 WL 13704, at *1 (D.S.D. Jan. 4, 2012), rev'd sub nom; *U.S. v. Jungers*, 702 F.3d 1066 (8th Cir. 2013); *U.S. v. Jungers*, 834 F. Supp. 2d 930, 930

law enforcement to view the buyer of sex acts in a sex trafficking case as distinct from a “john” in a prostitution case, and to prosecute the two differently. Purchasing sex acts with a 13-year-old is wholly different from prostitution, amounting essentially to purchased child rape. The significant federal sentencing levels for the crimes of sex trafficking and child pornography supplemented with mandatory sex offender registration present real punishment and deterrence when applied fully and consistently.²

However, more severe penalties are only an effective deterrent when they are fully enforced. Research focusing on outcomes of state prosecutions of child sex trafficking revealed penalties for buyers of sex acts with minors varied substantially, ranging from no term of imprisonment to 24 years, but median sentences demonstrated that the vast majority of cases resulted in little or no jail time.³ By contrast, buyer prosecutions for attempted sex trafficking, resulted in 10-15 year minimum sentences under federal law.⁴ As the enforcement of state laws lags behind the legislative trend to acknowledge the seriousness of child sex trafficking offenses committed by sex buyers, federal prosecutions are a critical mooring in the effort to end the commodification of children through strong penalties for those who buy sex with children.

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(D.S.D. 2011), rev'd, 702 F.3d 1066 (8th Cir. 2013). *See also* Shared Hope, *Demanding Justice Report* (2014), Case Studies at 89-109, available at http://sharedhope.org/wp-content/uploads/2014/08/Demanding_Justice_Report_2014.pdf.

² *See generally* *Demanding Justice Report*, *supra* n. 1 (study examining outcomes of investigations and prosecutions of buyers in child sex trafficking cases in four local sites finding excessive leniency and low sentencing undermining deterrence of strong laws).

³ *Id.* at 62.

⁴ *Id.* at 100-01, 107-09 (case studies *Sex Trafficking Buyer Convictions in Missouri* and *Anti-Demand Enforcement in the Dakotas*, examining how state, local and federal law enforcement cooperated to run internet stings targeting individuals seeking to purchase sex with children).

I. *Impact of Demand*

Sex trafficking, which includes the commercial sexual exploitation of any minor in prostitution, is a pervasive and growing problem in the United States.⁵ Of suspected human trafficking incidents in the U.S. investigated by federal human trafficking task forces between January 2008 and June 2010, the vast majority involved either prostitution or the sexual exploitation of a child.⁶

The buyers of commercial sex acts are the primary cause of the crime of child sex trafficking.⁷ This is not a victimless crime. Child sex trafficking victims suffer physical violence, emotional trauma, vulnerability and continuing health consequences.⁸ Child sex trafficking victims frequently become the victims of adult sex trafficking or prostitution after turning 18 because they are unable to escape or live a “normal” life.⁹

⁵See, e.g., Trafficking Victims Protection Act of 2000 (“TVPA”) § 103(9), (14); 22 U.S.C.A. § 7101.

⁶Bureau of Justice Statistics, *Most Suspected Incidents of Human Trafficking Involved Allegations of Prostitution of an Adult or Child* (Apr. 28, 2011), available at <http://www.bjs.gov/content/pub/press/cshti0810pr.cfm>.

⁷Linda A. Smith, Samantha Healy Vardaman & Melissa A. Snow, Shared Hope, *The National Report On Domestic Minor Sex Trafficking: America’s Prostituted Children 20* (2009), available at http://sharedhope.org/wp-content/uploads/2012/09/SHI_National_Report_on_DMST_2009.pdf.

⁸Laura J. Lederer, et al., *The Health Consequences of Sex Trafficking and Their Implications for Identifying Victims in Healthcare Facilities*, 23 *Annals Health L.* 61, 62 (Winter 2014); see also U.S. Dept. of St., *Trafficking in Persons Report 31* (June 2013) (“Sex trafficking has devastating consequences for minors”).

⁹Melissa Farley, et al., *Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder*, 2 *J. Trauma Prac.* 40 (2003) (47%—of 854 total respondents—of prostituted male, female, and transgendered persons reported first entering prostitution as a minor. 42% of the 130 respondents in the USA reported first entering prostitution as a minor.)

II. *Children Are Particularly Vulnerable to Sex Trafficking.*

Millions of girls worldwide and hundreds of thousands of girls in the U.S. fall victim to commercial sexual exploitation.¹⁰ Some estimates indicate that the U.S. has the third-largest number of children being trafficked in the world.¹¹ Victims come from all backgrounds and are of all races and ages.¹² The average age of entry into prostitution is estimated between 12 and 14.¹³ One Portland Metro Area study (where the offense was committed¹⁴, *see* Plea Agreement Letter ¶ 6) found 469 unduplicated CSEC victims identified between 2009 and 2013.¹⁵ The average age of these victims was 15.5 years with girls as young as eight years old identified as

¹⁰ *ILO 2012 Global Estimate of Forced Labour—Executive Summary*, available at http://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_181953.pdf; Linda Smith & Cindy Coloma, *Renting Lacy: A Story of America's Prostituted Children*, Shared Hope, 95 (2009). The sex trafficking industry victimizes men and boys too, but because the victims of sex trafficking are predominately women and girls, Amicus usually refer to the trafficking of “girls” herein. *See* TVPA § 102(b)(4) (“Traffickers primarily target women and girls.”)

¹¹ *See* Sara Dillon, *What Human Rights Law Obscures: Global Sex Trafficking and the Demand for Children*, 17 *UCLA Women's L.J.* 121, 130 (2008).

¹² UNICEF, *End Trafficking Campaign*, <http://www.unicefusa.org/mission/protect/trafficking> (last visited Oct. 7, 2014) (“Cases of human trafficking have been reported in all 50 U.S. States; anyone can be trafficked regardless of race, class, education, gender, age, or citizenship....”).

¹³ Memo. re: Commercial Sexual Exploitation in the Portland Metro Area to U.S. Att’y Amanda Marshall et al. from Christopher Carey and Lena Teplitsky, at 3 (Portland St. Univ.) Aug. 5, 2013; Estes, Richard J. and Neil Alan Weiner. *Executive Summary: Commercial Sexual Exploitation of Children in the U.S., Canada and Mexico*, Univ. of Penn., Feb. 2002 rev’n.

¹⁴ Office of Mgmt. & Budget, Exec. Office of the Pres., OMB Bull. No. 08-01, *Update of Statistical Area Definitions and Guidance on Their Uses*, at 45 (2007), available at <http://www.whitehouse.gov/sites/default/files/omb/bulletins/fy2008/b08-01.pdf> (defining Clackamas County as part of the Portland-Vancouver-Beaverton, OR-WA Metropolitan Statistical Area).

¹⁵ *Infra* n. 19.

victims of commercial sexual exploitation.¹⁶ The extent of commercial sexual exploitation in Oregon has been chronicled in numerous news articles and documentaries.¹⁷

Children are particularly vulnerable to sex trafficking because of their emotional and economic dependence on others.¹⁸ Adolescents have not fully developed the ability to analyze decisions and understand consequences.¹⁹ As a result, children enmeshed in the sex trafficking industry often fail to recognize that they are being exploited, manipulated, or that they are in danger.²⁰ Numerous laws recognize that a minor requires protection from decisions related to sexual activity.²¹ Now, many states are recognizing that laws criminalizing prostitution should

¹⁶ *Id.*

¹⁷ “In Search of Love: Teens Lured Into Sex Trade,” ABC News, Sept. 22, 2010, available at <http://abcnews.go.com/US/portland-emerges-hub-child-sex-trafficking/story?id=11690544>; Shared Hope, *Chosen: A Documentary by Shared Hope International* (2013) (featuring a girl from Oregon who was recruited for sex trafficking and forced to perform in Portland strip clubs).

¹⁸ See, e.g., *Miller v. Alabama*, 567 U.S. ___, 132 S. Ct. 2455, 2464 (2012) (“children ‘are more vulnerable . . . to negative influences and outside pressures,’ including from their family and peers; they have limited ‘contro[l] over their own environment’ and lack the ability to extricate themselves from horrific, crime-producing settings”) (quoting *Roper v. Simmons*, 543 U.S. 551 (2005)); *Roper*, 543 U.S. at 569 (“juveniles are more vulnerable or susceptible to negative influences and outside pressures”).

¹⁹ See *Miller*, 132 S. Ct. at 2465 (children have a “proclivity for risk” and an “inability to assess consequences”). Megan Annitto, *Consent, Coercion, and Compassion: Crafting a Commonsense Approach to Commercial Sexual Exploitation of Minors*, 30 Yale L. & Pol’y Rev. 59 (2011) (“underdevelopment in certain areas of the adolescent brain affect behavior, decision making, and the ability to understand consequences”); Lawrence Steinberg, *Risk Taking in Adolescence: New Perspectives from Brain and Behavioral Science*, 16 Current Directions in Psychol. Sci. 55, 56 (2007) (children have not developed the “psychosocial capacities that improve decision making . . . such as impulse control, emotion regulation, delay of gratification, and resistance to peer influence”).

²⁰ See, e.g., Annitto, *supra* n. 23, at 13 (“when a pimp introduces a young girl into prostitution, she fails to recognize that she is a victim and becomes trapped”).

²¹ *Christensen v. Royal Sch. Dist.*, 156 Wn.2d 62, 68 (Wash. 2005) (children “are too immature to rationally or legally consent” to sex).

not apply to children because trafficked children are victims.²² Federal law recognizes this, eliminating the requirement to prove force, fraud or coercion was used to commit the trafficking when the victim is a child.²³

Children with a history of abuse, poverty, neglect; runaway or homeless youth; and youth in foster homes or under the care of social services are particularly vulnerable as traffickers target the most economically and socially vulnerable populations.²⁴ However, virtually any child is vulnerable due to their reliance on adults for basic needs.²⁵ Traffickers are also adept at taking advantage of children’s developmental immaturity.²⁶ Traffickers nurture an emotional connection with a child, providing whatever the child needs at the time—affection, protection, shelter, food, clothing—coupled with severe violence, torture and/or rape to gain control over the

²² Tessa L. Dysart, *Child, Victim, or Prostitute, Justice through Immunity for Prostituted Children*, 21 Duke J. Gender L. & Pol’y 255, 265-67 (2014).

²³ 18 U.S.C. § 1591(a); TVPA § 103(8), (13).

²⁴ See *U.S. v. Brooks*, 610 F.3d 1186, 1199-200 (9th Cir. 2010) (adults targeted minors with “no money, no job, and . . . nowhere to live”); *In re B.W.*, 313 S.W.3d 818, 825-26 (Tex. 2010) (children with a history of abuse and/or neglect are most at risk of sexual exploitation); *Protecting Vulnerable Children: Preventing and Addressing Sex Trafficking of Youth in Foster Care*, Testimony of John D. Ryan for the U.S. House of Rep. Comm. on Ways and Means Subcomm. on Human Resources (Oct. 23, 2013), available at <http://www.missingkids.com/Testimony/10-23-13>.

²⁵ Covenant House, *Homelessness, Survival Sex and Human Trafficking: As Experienced by the Youth of Covenant House New York*, 6-7, 14-15, 20 (May 2013), available at <http://www.covenanthouse.org/sites/default/files/attachments/Covenant-Housetrafficking-study.pdf>

²⁶ See Joan A. Reid, *Doors Wide Shut: Barriers to the Successful Delivery of Victim Services for Domestically Trafficked Minors in a Southern U.S. Metropolitan Area*, 20 Women & Crim. Just. 147, 148-50, 158 (2010).

child.²⁷ The buyers of the sex acts provide the market incentive for these traffickers to continue committing their crimes banking on the buyers' complicit silence.²⁸

III. *The Consequences for Child Victims of Sex Trafficking Are Devastating.*

A child sold for a sex act is not a child who has "chosen" to engage in prostitution.²⁹ The U.S. Department of Justice explains, "Using the term prostitution in connection with children can confuse one's understanding of this form of child sexual exploitation. The term itself implies the idea of choice, when in fact that is not the case. It is important to emphasize that the children involved are victims."³⁰

The consequences of this repeated exploitation are devastating in cases of child sex trafficking.³¹ Sex trafficking victims endure serious physical injuries from beatings and rapes by traffickers and buyers.³² Victims are more susceptible to drug or alcohol addiction, both as a form of control by their trafficker and as a source of self-medication to survive their repeated

²⁷ See, e.g., Smith & Coloma, *supra* n. 11, at 119-20; *In re B. W.*, 313 S.W.3d at 824-25 ("Most of these children are controlled by their pimps through a combination of emotional and financial security mixed with violence and drugs, and are unaware that the treatment they are receiving is against the law.").

²⁸ Meredith Dank et al., *Estimating the Size and Structure of the Underground Commercial Sex Economy in Eight Major U.S. Cities*, 192-95 (The Urban Institute 2014) (discussing the growing use of the internet by traffickers to attract "trustworthy" buyers).

²⁹ See, e.g., *Exploiting Americans on American Soil: Domestic Trafficking Exposed*, Hearing on H.R. 972 before the Comm'n on Sec. & Cooperation in Europe, 109th Cong., at 6 (2005) ("[C]hildren can never consent to prostitution. It is always exploitation.")

³⁰ See Dept. of Just. Website, *Child Exploitation and Obscenity Section*, <http://www.justice.gov/criminal/ceos/subjectareas/prostitution.html> (last visited Oct. 7, 2014).

³¹ See Linda A. Smith et al., *The National Report on Domestic Minor Sex Trafficking: America's Prostituted Children*, Shared Hope, 41-42 (May 2009), available at http://sharedhope.org/wpcontent/uploads/2012/09/SHI_National_Report_on_DMST_2009.pdf.

³² See, e.g., Melissa Farley, *Prostitution, Trafficking, and Cultural Amnesia: What We Must Not Know in Order To Keep the Business of Sexual Exploitation Running Smoothly*, 18 Yale J.L. & Feminism 109, 112-17 (2006) (detailing the extreme violence that victims of commercial sexual exploitation endure).

sexual exploitation.³³ Most sex trafficking victims suffer from significant mental health issues, including depression, anxiety, nightmares, flashbacks, and/or low self-esteem.³⁴ They have an increased risk of contracting serious diseases and having dietary issues, including severe weight loss, malnutrition, and eating disorders.³⁵ Additionally, many child sex trafficking victims become pregnant as a result of their sexual exploitation, sometimes intentionally by their trafficker as a means of maintaining control over the girl.³⁶ In fact, a Portland Metro Area study found that 16.6% of the 331 trafficked youth with active cases were already parents.³⁷

IV. *Deterrence Value of Serious Sentencing.*

Buyers of sex acts are likely to avoid the full punishment available under the law.³⁸ However, research shows that serious punishment would be an effective deterrent. Men interviewed for a study on deterring demand in London stated that consequences that would deter them from buying commercial sex include: the threat of imprisonment; being added to a sex offender registry; public exposure such as a billboard announcement, a newspaper notice, or an

³³ See, e.g., Lederer, *supra* n. 8, at 75-76.

³⁴ *Id.*, at 68, 71-74, 79.

³⁵ *Id.*, at 61, 62; see TVPA §102(b)(11) (“[t]rafficking exposes victims to serious health risks,” including “deadly diseases [like] HIV and AIDS”).

³⁶ See Protected Innocence Legislative Framework (2011), Shared Hope Int’l, at 6, available at http://sharedhope.org/wp-content/uploads/2012/09/SHI_ProtectedInnocence_Methodology_FINAL.pdf; U.S. Dept. of St., *Trafficking in Persons Report* 31 (June 2013) (“Sex trafficking has devastating consequences for minors, including long-lasting physical and psychological trauma, disease (including HIV/AIDS), drug addiction, unintended pregnancy, malnutrition, social ostracism, and death.”). See also, Lederer, *supra* n. 9, at 72-3 (71.2% of the 66 women who responded indicated at least one pregnancy while being trafficked; 21.2% indicated five or more pregnancies. More than 55% of the women surveyed had at least one abortion and 30% had multiple abortions during the time of being trafficked. Of the 34 respondents answering the question, 18 indicated the abortions were at least partially forced upon them by their trafficker. The age at which pregnancy or abortion occurred was not provided).

³⁷ See *supra* n. 19, at 4.

³⁸ See *Demanding Justice Report*, *supra* n. 1.

Internet webpage; or a letter to their family or employer.³⁹ The interviewees also cited increased fines, increased criminal penalties, suspension of a driver's license, or car impoundment as deterrents.⁴⁰ Men interviewed in Chicago identified similar deterrents to buying sex, with 83% responding that jail time would be a deterrent to buying sex.⁴¹ However, of the 113 interviewees who purchased sex in Chicago, only 7% had ever been arrested for soliciting a woman in prostitution.⁴² Although one man claimed to have been arrested twenty-five times, most of those who had been arrested had only been arrested once.⁴³ The overwhelming majority of men who bought sex stated that more severe penalties for soliciting prostitution would deter them.⁴⁴

CONCLUSION

Efforts to combat sex trafficking through law enforcement action have traditionally focused on the trafficker, but more recent efforts and resources have been allocated to understanding the dynamic of demand as part of the trafficking crime in order to better counter it.⁴⁵ Some states have enacted laws that more harshly criminalize the purchase of sex with a

³⁹ Farley et al., *Prostitution and Trafficking in Nine Countries*, *supra* n. 10, at 22.

⁴⁰ *Id.*

⁴¹ Rachel Durchslag & Samir Goswami, Chi. Alliance Against Sexual Exploitation, *Deconstructing The Demand For Prostitution: Preliminary Insights From Interviews With Chicago Men Who Purchase Sex*, 24 (2008), available at <http://www.salvationarmychicago.net/promise/files/2012/11/deconstructing.pdf>.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ Farley et al., *Prostitution and Trafficking in Nine Countries*, *supra* n. 10, at 26.

⁴⁵ *See, e.g.*, Office of Legal Policy, U.S. Dep't of Justice, Attorney General's Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking In Persons 62 (2010), available at <http://www.justice.gov/archive/ag/annualreports/agreporthumantrafficking2010.pdf> (outlining several U.S. government-funded research projects and programs addressing demand and providing statistics for fiscal year 2010 and showing that there were 113 defendants charged under § 1591 and 85 convictions in 71 cases under § 1591).

minor,⁴⁶ but many have not. Enforcement of federal sex trafficking laws are the cornerstone of combatting these crimes. Demand for the commercial sex acts is what drives traffickers to offer children for sale. Sentencing buyers to serious prison terms is essential to deterring the crime. Victims are counting on it.

DATED this 7th day of October, 2014.

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⁴⁶ See Shared Hope, *State Survey Law: Base Penalties for Buying Sex Acts With Minors*, available at http://sharedhope.org/wp-content/uploads/2014/06/Shared-Hope-State-law-survey_Buyer-Base-Penalties_through-8.1.pdf.

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing document on the following

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