

Representation Matters

How the Lack of Diversity in Domestic Minor Sex Trafficking Media Campaigns Perpetuates the Adultification Bias Against Black Children

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Introduction

Representation matters. Especially in the media. Representation matters because it can provide an accurate depiction of a variety of perspectives in the mainstream media. Without proportionate, or equal, representation, people begin to feel like they are not heard or seen, that their perspectives and experiences do not matter, and that they will continue to be overlooked. Over the past few decades, we have seen an increase in diversity in the media. For example, *Julia*, a 1968 sitcom, is recognized as the first television show to have a black female as the main character in a non-servant role;¹ *A Different World*, a 1980s sitcom, was the first television show to depict black college students at a historically black college;² and, in 2009, Disney unveiled its first black princess, Tiana, in the hit movie *The Princess and the Frog*.³

These depictions of black life and culture existed in the real world before their mainstream media debuts. There were black nurses before *Julia* aired,⁴ there were black college students before *A Different World*,⁵ and there were black princesses long before Princess Tiana.⁶ Nevertheless, due to a lack of representation in the media, the public's perception of the "typical" nurse, college student, or princess, was not black.

¹ Walter Opinde, *Julia TV Series: The First Portrayal of the Non-Stereotypical Role of an African-American Woman, Diahann Carroll*, BLACK THEN (Apr. 23, 2019), https://blackthen.com/julia-tv-series-first-portrayal-non-stereotypical-role-african-american-woman-diahann-carroll/.

² Julian Kimble, A Different World Took HBCU Life to Primetime, FADER (Sept. 28, 2017),

https://www.thefader.com/2017/09/28/a-different-world-hbcu-30-anniversary.

³ Brooks Barnes, *Her Prince Has Come*, THE NEW YORK TIMES (May 29, 2009),

https://www.nytimes.com/2009/05/31/fashion/31disney.html.

⁴ Historically Black Nursing Schools: Yesterday and Today, MINORITY NURSE (Mar. 30, 2013),

https://minoritynurse.com/historically-black-nursing-schools-yesterday-and-today/ (noting that historically black universities have trained Black nurses since the late 1800s).

⁵ Monica Anderson, *A Look at Historically Black Colleges and Universities as Howard Turns 150*, PEW RES. CTR. (Feb. 28, 2017), https://www.pewresearch.org/fact-tank/2017/02/28/a-look-at-historically-black-colleges-and-universities-as-howard-turns-150/ (noting that there are over 100 historically black colleges and universities in the United States, all established prior to 1964).

⁶ Janell Hazelwood, *Meghan Markle is Black Royalty: Here Are 6 More Royal Black Women Around the World*, BLACK ENTER. (May 6, 2019), https://www.blackenterprise.com/royal-report-6-regal-black-women-from-around-the-world/ (listing Princess Tatjana of Liechtenstein, Princess Angela of Liechtenstein, Princess Sikhanyiso of Swaziland, and Princess Keisha Omilana of Nigeria as some of many, real life black female royals).

Media representations mold the public's perception of what is "typical" and how society responds to racial minorities.⁷ For example, between 1984 and 1993, during which time A Different World aired, enrollment at historically black colleges and universities (HBCUs) grew 24.3%.8 However, in the eleven years after the series finale of A Different World, enrollment in HBCUs grew only 9.2%, while total enrollment in institutions of higher education grew 20.7%.⁹

Representation not only matters when providing positive depictions of black life and culture, but also when shining a light on social problems that disproportionately affect minorities. One such significant social problem is domestic minor sex trafficking. Domestic minor sex trafficking is the commercial sexual exploitation of American children under the age of 18 within U.S. borders for the purposes of prostitution, pornography, or sexual performance.¹⁰ According to the U.S. Department of Justice, 300,000 children are at risk of being sexually trafficked each year in the United States.¹¹

Victims of domestic minor sex trafficking come from all races, genders, and socioeconomic backgrounds. However, a disproportionate amount of these victims are black girls from low-income communities.¹² Despite the disproportionate representation, an overwhelming majority of awareness campaigns and media coverage shining light on domestic minor sex trafficking depict young white girls as victims, with little to no representation of black children.

https://www.unboundphilanthropy.org/sites/default/files/PopJustice%20Volume%203 Research%20Review.pdf. ⁸ Scott Aughtmon, TV Show "A Different World" Was Unintentional Content Marketing for Historically Black Colleges, RECESSION SOLUTION (Sept. 14, 2017), https://recessionsolution.com/2017/09/14/tv-show-a-differentworld-was-unintentional-content-marketing-for-historically-black-colleges/. ⁹ Id.

¹⁰ Protected Innocence Challenge Toolkit 2018, SHARED HOPE INT'L, https://sharedhope.org/wpcontent/uploads/2018/11/2018ProtectedInnocenceChallengeToolkit.pdf (last visited Dec. 8, 2019).

⁷ See generally Rachel D. Godsil et. al., #PopJustice, Volume 3: Pop Culture, Perceptions, and Social Changes, UNBOUND PHILANTHROPY (Feb. 2016),

¹¹Sebastien Malo, Child Sex Trafficking Victims Need Services Not Punishment, REUTERS (Feb. 13, 2017, 6:14 PM), https://www.reuters.com/article/us-usa-trafficking-children-idUSKBN15S2LN.

¹² African American Human Trafficking Numbers Among the Highest in the Country, THE VOICE OF BLACK CINCINNATI (Nov. 20, 2019), https://thevoiceofblackcincinnati.com/african-american-human-trafficking/.

On the other hand, black girls who are victims of minor sex trafficking are more likely to be arrested for prostitution, or related offenses,¹³ rather than receiving victim services. When society views the "typical victim" of domestic minor sex trafficking as a young white female, a false and dangerous public perception is created where black girls are not victims, but rather willing participants of their exploitation.

Part I of this essay provides an overview of domestic minor sex trafficking of black girls, the media's perception of the typical victim of domestic minor sex trafficking, and state laws related to the prosecution of minors for prostitution. Part II analyzes the on-the-ground effect of state prostitution laws and how the media's influence can alter how laws are implemented. Part III will provide suggestions for how to diversify the media's perception of a domestic minor sex trafficking victim.

Part I

1. The Adultification of Black Girls

In many respects, black girls do not get to enjoy the presumption of childhood. Children are commonly known to be all persons below the age of majority.¹⁴ However, our understanding of childhood is socially constructed.¹⁵ A report published by the Georgetown Law Center on Poverty and Inequality shows that adults were more likely to assume that black girls are older, more independent, more responsible for their offenses, and more knowledgeable about sex — in other words, more adult-like — than white girls of the same age.¹⁶ This is known as adultification

¹³ Priscilla A. Ocen, *(E)Racing Childhood: Examining the Racialized Construction of Childhood and Innocence in the Treatment of Sexually Exploited Minors*, 62 UCLA L. REV. 1586, 1590 (2015) (stating that related offenses include runaway, curfew violations, and other status crimes).

¹⁴ *Id.* at 1592.

¹⁵ *Id*.

¹⁶ Rebecca Epstein & Jamilia J. Blake & Thalia González, *Girlhood Interrupted: The Erasure of Black Girls' Childhood*, GEORGETOWN L. CTR. ON POVERTY AND INEQ., https://www.law.georgetown.edu/poverty-inequality-center/wp-content/uploads/sites/14/2017/08/girlhood-interrupted.pdf. (last visited Feb. 25, 2020).

bias. Professor Priscilla Ocen, a Professor of Law at Loyola Law School in Los Angeles, asserts that black girls live at the margins of childhood, which she defines as "liminal childhood."¹⁷ Ocen explains that black girls are "viewed as dependent, limited rights-bearing subjects while at the same time imbued with adult characteristics such as sexual maturity, individual agency, and criminal responsibility."¹⁸ Therefore, notwithstanding their age, black girls are viewed as "street smart," less dependent on adults, less vulnerable to adult manipulation or abuse, more mature, and thus possessing more agency over their sexuality than their white peers.¹⁹

2. The "Typical" Victim

There are certain risk factors that increase the likelihood that a child may become a victim of domestic minor sex trafficking. These factors include having a history of sexual and physical abuse, community and family instability and dislocation, poverty, being a runaway, throwaway or homeless youth, or history in child protective services or foster care.²⁰ Black girls are more likely to experience these risk factors because they are more likely to experience poverty and be further disconnected from schools and other community support.²¹ Although making up approximately 13% of the general population,²² according to the Federal Bureau of Investigation (FBI), 40% of victims of sex trafficking are black, with this number being significantly larger in metropolitan areas.²³

¹⁷ Ocen, *supra* note 13.

¹⁸ *Id*. at 1594.

¹⁹ *Id.* at 1593.

²⁰ Domestic Child Sex Trafficking and African-American Girls, HUM. RTS. PROJECT FOR GIRLS,

http://rights4girls.org/wp-content/uploads/r4g/2015/02/African-American-Girls-and-Trafficking.pdf (last visited Dec. 8, 2019).

²¹ Id.

²² *Quick Facts: United States*, U.S. CENSUS BUREAU, https://www.census.gov/quickfacts/fact/table/US/PST045219 (last visited Feb. 5, 2020).

²³ Domestic Child Sex Trafficking and African-American Girls, *supra* note 20.

Despite statistics showing that black girls from low-income communicates represent a significant proportion of victims of domestic minor sex trafficking, the media's perception of a "typical" victim is drastically different. Mainstream media's "typical" victim is a young, white girl who is innocent and vulnerable.²⁴ The white female victim possesses little agency and is grateful for the intervention of law enforcement.²⁵ These "picture perfect" victims come from loving families; do well academically; have little to no behavior problems; and are known, involved, and respected members of their communities. The "typical" victim as portrayed by mainstream media looks more like Jaycee Dugard²⁶ or Elizabeth Smart,²⁷ white girls from good families who were abducted and forced into sexual relationships with their captors.

Beyond the headlines, the image of the white girl victim is depicted in various media campaigns bringing awareness to domestic minor sex trafficking. Public campaigns to enhance protections for sexually trafficked children are infused with descriptions of trafficking victims as white girls who represent "Little Barbies" or "The Girl Next Door"²⁸ in order to "invoke outrage for the loss of childhood innocence and empathy for victims."²⁹ For example, a Vanity Fair article titled, *Sex Trafficking of Americans: The Girl Next Door* showed a young white female on a mattress with a much older man in the background.³⁰ An Airlines Ambassadors International poster bringing awareness to human sex trafficking in airports shows the face of a young white

²⁴ Ocen, *supra* note 13, at 1624.

²⁵ Id.

²⁶ Jaycee Dugard is a white female who was abducted from her front yard at age 11 and held captive for 18 years in a shed where she gave birth to two babies, fathered by her abductor. *Jaycee Dugard Biography*, BIOGRAPHY, https://www.biography.com/crime-figure/jaycee-dugard (last updated June 28, 2019).

²⁷ Elizabeth Smart is a white female who was abducted from her home at age 14 and repeated raped and abused by her attacker. *Elizabeth Smart Biography*, BIOGRAPHY, https://www.biography.com/crime-figure/elizabeth-smart (last updated Apr. 16, 2019).

²⁸ Ocen, *supra* note 13, at 1619.

²⁹ Id.

³⁰ Amy Fine Collins, *Sex Trafficking of Americans: The Girls Next Door*, VANITY FAIR (May 2011), https://www.vanityfair.com/news/2011/05/sex-trafficking-201105.

girl, who appears to be about eight years old, with a male hand covering her mouth.³¹ These images have not only been used in the media and public awareness campaigns, but also "have been embraced by federal law enforcement" ³² in anti-trafficking ad campaigns, such as Homeland Security's Blue Campaign: Ericka Series awareness videos.³³ This series of videos, highlighting the visible signs of sex trafficking, follows a girl named Ericka, who is trafficked and forced to recruit other underaged girls. However, all the female actresses used in the series are white. "Invocation of descriptors such as 'the Girl Next Door' and 'Little Barbie' to describe the paradigmatic victim of trafficking reinforces the ideal victim as a child who is white and exemplifies 'chastity, and obedience to parental and state authority."³⁴ As a consequence, "Black girls are excluded from constructs of the paradigmatic victim of child-sex trafficking despite the fact that they are disproportionately targeted by exploiters."³⁵

If the mainstream media, and law enforcement agencies, depict a "typical" victim of domestic minor sex trafficking as an innocent white girl, what is the effect, if any, on exploited children who do not fit the mold? Unfortunately, the effects are devastating. Federal law requires that children reported as missing to law enforcement be entered into the FBI's National Crime Information Center (NCIC).³⁶ However, black girls who are lured away from their homes, if reported missing, are more likely to be considered "runaways" and therefore police and other law

³⁴ Ocen, *supra* note 13, at 1619.

³¹ Glenn Kessler, *Are 68,000 People A Day 'Trafficked Right in Front of our Eyes'? Nope.*, THE WASHINGTON POST (Oct. 11, 2018, 3:00 AM), https://www.washingtonpost.com/politics/2018/10/11/are-people-day-trafficked-right-front-our-eyes-nope/.

³² Ocen, *supra* note 13, at 1619.

³³ Sex Trafficking Awareness Videos, U.S. DEP'T OF HOMELAND SECURITY, https://www.dhs.gov/bluecampaign/videos/sex-trafficking (last visited Feb. 25, 2020).

³⁵ Id.

³⁶ Missing Children Statistics, NAT'L CTR. FOR MISSING & EXPLOITED CHILD.,

http://www.missingkids.com/footer/media/keyfacts (last visited Feb. 5, 2020).

enforcement officials never look for them.³⁷ In addition to the misclassification of black girls as "runaways," their families may be hesitant to contact law enforcement and may lack the financial resources necessary to respond appropriately when a child is missing.³⁸ According to the FBI's NCIC, 421,394 children were reported missing in 2019, 91% of whom were considered to be "endangered runaways."³⁹ The National Center for Missing and Exploited Children (NCMEC) assisted law enforcement with more than 29,000 cases of missing children that year, approximately 4,383 of which are believed to be victims of child sex trafficking.⁴⁰ What remains unknown is how many of the 91% of children considered to be "runaways" were black girls who were misclassified despite being victims of domestic minor sex trafficking.

3. State Laws

Victims of domestic minor sex trafficking are forced to engage in sexual acts for profit, which some classify as prostitution. States take different approaches to the criminalization of juvenile prostitution. Some states prohibit the criminalization of minors for prostitution.⁴¹ Others do not explicitly prohibit the criminalization of minors for prostitution, but they do allow for

³⁷ Harmeet Kaur, *Black Kids Go Missing at a Higher Rate Than White Kids: Here's Why We Don't Hear About Them*, CNN (Nov. 3, 2019, 4:11 PM), https://www.cnn.com/2019/11/03/us/missing-children-of-color-trnd/index.html (listing classification as a runaway as one of the reasons experts say we do not hear about missing children of color).

³⁸ Id.

³⁹ Missing Children Statistics, *supra* note 36.

⁴⁰ Id.

⁴¹ For example, ALA. CODE § 13A-12-123 which states that a sexually exploited child may not be prosecuted for prostitution. And O.C.G.A. § 16-6-9 which states "A person, 18 years of age or older, commits the offense of prostitution when he or she performs or offers or consents to perform a sexual act, including, but not limited to, sexual intercourse or sodomy, for money or other items of value."

affirmative defenses for those who are either under 18 years old or victims of child sex trafficking.⁴² Lastly, some states allow for the criminalization of minors for prostitution.⁴³

Overall, states are moving towards prohibiting the criminalization of minors for prostitution. In 2015, only fifteen states prohibited the criminalization of minors for prostitution.⁴⁴ By 2018, this number rose to twenty-five states.⁴⁵ Currently, there are at least twenty-seven states that prohibit the arrest of juveniles for prostitution,⁴⁶ with more states proposing changes to current laws to include the prohibition of criminalizing minors for prostitution.⁴⁷ However, despite the trend towards the decriminalization of prostitution for minors, black girls continue to be less likely to be identified as victims of domestic minor sex trafficking.

Part II

1. On-the-Ground Effect of State Laws

There are a number of ways to identify victims of domestic minor sex trafficking. School officials, health care and social service providers, law enforcement officials, as well as ethnic,

⁴² Such as KAN. STAT. ANN. § 21-6419 which states, "it shall be an affirmative defense to any prosecution under this section that the defendant committed the violation of this section because such defendant was subjected to human trafficking or aggravated human trafficking, as defined by K.S.A. 21-5426, and amendments thereto, or commercial sexual exploitation of a child, as defined by K.S.A. 21-6422, and amendments thereto."

⁴³ Such as Idaho, whose prostitution statute does not explicitly mention age or affirmative defenses. "A person is guilty of prostitution when he or she: (a) engages in or offers or agrees to engage in sexual conduct, or sexual contact with another person in return for a fee; or (b) is an inmate of a house of prostitution; or (c) loiters in or within view of any public place for the purpose of being hired to engage in sexual conduct or sexual contact." IDAHO CODE ANN. § 18-5613 (West 2019).

⁴⁴ State Law Survey: Prohibiting Criminalization of Juvenile Sex Trafficking Victims Under State Prostitution Laws, SHARED HOPE INT'L, http://sharedhope.org/wp-content/uploads/2015/09/SharedHopeStateLawSurvey_Non-criminalizationofminors.pdf (last visited Dec. 8, 2019).

⁴⁵ Protected Innocence Challenge, *National State Law Survey: Non-Criminalization of Juvenile Sex Trafficking Victims*, SHARED HOPE INT'L, http://sharedhope.org/PICframe8/statesurveycharts/NSL_Survey_Non-CriminalizationofJuvenileSexTraffickingVictims.pdf (last visited Dec. 8, 2019).

⁴⁶ Both Georgia and Hawaii changed their prostitution statutes in 2019 to exclude minors. HAW. REV. STAT. § 712-1200 (2019). O.C.G.A. § 16-6-9 (2019).

⁴⁷ Nevada's statute which states, "engaging in prostitution or solicitation for prostitution not grounds for adjudication as delinquent," goes into effect in July 2022. NEV. REV. STAT. ANN. § SB 293, § 16 (West 2019).

community, and faith-based organizations may encounter victims through their work.⁴⁸ However, when juvenile victims of sex trafficking are discovered by law enforcement officials while engaging in an alleged sexual crime, such as prostitution, law enforcement officials must determine the next course of action. Is the child a victim? Is the child willfully engaging in prostitution or a related offense? The resulting decision by law enforcement determines whether and how a victim may receive services, or if the child is even considered to be a victim. In 2014, the Bureau of Justice reported that 581 girls under the age of 18 were arrested nationwide for prostitution.⁴⁹ According to the FBI, African-American children comprise of 59% of youth whom are arrested for prostitution—more than any other racial group.⁵⁰ In a Los Angeles County study of juveniles arrested for prostitution, it was found that black girls comprised of 92% of arrestees even though they represent only 3% of the overall county population.⁵¹

2. Responses to Black Girl Victims

Law enforcement, judicial, and child welfare responses to black girls who are victims of minor sex trafficking must change to ensure that black girls are treated as victims, have access to the justice system, and receive appropriate interventions and therapeutic services. Although trends in state laws are improving, laws alone are inadequate to ensure that black girls are not criminalized for their exploitation.

While many states allow for a victim's age to be used as an affirmative defense to the crime of prostitution, these defenses are often not properly raised until trial. As a result, the child victim may still be arrested, charged, and imprisoned for the crime of prostitution while awaiting trial.

⁴⁸ Identifying Victims of Human Trafficking: Fact Sheet, DEP'T OF HEALTH AND HUM. SERVS.,

https://www.acf.hhs.gov/sites/default/files/orr/fact_sheet_identifying_victims_of_human_trafficking.pdf (last visited Jan. 19, 2020).

 ⁴⁹ Bill Torpy, *Breaking Down the 169 Sex Trafficking Arrests in Metro Atlanta*, WSB-TV (Feb. 6, 2019, 12:04 PM), https://www.wsbtv.com/news/local/breaking-down-the-169-sex-trafficking-arrests-in-metro-atlanta/915617548.
⁵⁰ Domestic Child Sex Trafficking and African-American Girls, *supra* note 20.

⁵¹ Ocen, *supra* note 13, at 1591.

Further, because prostitution is a misdemeanor crime, many victims will enter guilty pleas to avoid serious punishment, such as jail time, and therefore never reach the adjudication phase of a trial during which they may raise their age as an affirmative defense.

Additionally, although many states have laws precluding children from being arrested for prostitution, child victims may be arrested for status crimes or other trafficking-related offenses, such as possession of drug paraphernalia or obscenity offenses. The discretion of whether to arrest child victims is usually left up to law enforcement officials who may have adultification bias against black girls⁵² and whose perception of the typical victim of child sex trafficking is influenced by mainstream media. Adultification bias and media influences lead to more black girls being arrested for trafficking-related crimes, and therefore black girls are treated as criminals rather than receiving the benefits that come with being labeled a victim.

3. Why Black Girls are Treated Differently

The determination of whether to criminally charge a minor for prostitution "often turns on how closely aligned a child is to the ideal child sex trafficking victim in the eyes of the official tasked with enforcement of the juvenile prostitution statute."⁵³ Black girls, who are stereotyped as sexually promiscuous and independent, do not fit the ideal victim mold and are therefore more likely to be classified as offenders.⁵⁴ Often, discretionary decisions to divert or prosecute exploited children are driven more by the characteristics of the child or the biases of a law enforcement official rather than the conduct of the child or the elements of the offense.⁵⁵ Moreover, although a victim may be able to raise the affirmative defense of her minor status at trial, it is still up to a fact

⁵² Epstein & Blake & González, *supra* note 16, at 8 ("[A]dultification may serve as a contributing cause of the disproportionality in school discipline outcomes, harsher treatment by law enforcement, and the differentiated exercise of discretion by officials across the spectrum of the juvenile justice system").

⁵³ Ocen, *supra* note 13, at 1624.

⁵⁴ Id.

⁵⁵ *Id.* at 1625.

finder—meaning judge or jury—to determine whether or not they believe that the victim is "youthful" and therefore deserving of victim status. If law enforcement, judges, and juries do not view black girls as victims, black girls will continue to be criminally prosecuted for being exploited. Mainstream media depictions of victims of domestic minor sex trafficking must change to include the most at-risk demographic, black girls. Once the media, and society as a whole, changes its perception of a victim, law enforcement and triers of fact will begin to see black girls as young and innocent victims instead of mature and promiscuous criminals.

Part III

The invisibility of black girls in awareness campaigns and widespread stories about missing children heightens the risk that the general public, including those in law enforcement, will not see black girls as victims, but rather as willing participants in their own exploitation, ultimately leading to them being criminalized for their victimhood. In order to change the public's current perception of childhood and innocence, law enforcement, mainstream media platforms, and private and non-profit organizations advocating for victims of domestic minor sex trafficking need to ensure diverse representation in media and public awareness campaigns. Increased diversity in campaigns must be representative of victims of domestic minor sex trafficking, including diversity in race, ethnicity, sexual orientation, body type, and gender identity. Diversification of media images of trafficking victims will not only change the public and law enforcement's perception of a victim, but it will also lead to more accurate identification of victims and more effective prevention and intervention services.

Using photography in awareness campaigns is key to capturing, retaining, and directing people's attention, and will result in the successful delivery of intended messages. Some may argue that using photos of white girls in awareness campaigns regarding domestic minor sex trafficking

12

will increase sympathy to the cause, spurring the general population into action. However, the idea that black girls are not as "relatable" to the public as white girls has a negative impact in the battle against domestic minor sex trafficking. Successful media campaigns are designed to increase public knowledge and change behaviors and attitudes towards an issue.

Diverse representation in the media is a powerful tool that can have a significant impact, as shown by increased enrollment at HBCUs while *A Different World* was on the air. Absent a mainstream depiction of black college students attending an HBCU, enrollment in HBCUs may not have increased as significantly. Similarly, to be effective and have meaningful impact, mainstream media campaigns meant to increase awareness of domestic minor sex trafficking must include black girls in photo campaigns. Including black girls, and other non-white victims of domestic minor sex trafficking, in media campaigns will lead to accurate identification of victims, as well as better prevention and intervention services.

Conclusion

Black girls make up 40% of victims of domestic minor sex trafficking. However, the mainstream media depicts "typical" victims of domestic minor sex trafficking as white girls. Inaccurate and non-representative media campaigns have reinforced an adultification bias against black girls, who are more likely to be seen as willing participants of their exploitation, more likely to be arrested for prostitution or related offenses, and less likely to receive victim services. Changing state laws alone is insufficient to change public and law enforcement perceptions of black girls who have been sexually exploited. In addition to changing state laws to prohibit the criminalization of minors for prostitution and other related offenses, law enforcement, mainstream media outlets, and private and non-profit organizations advocating for victims of domestic minor sex trafficking must diversify awareness campaigns and news coverage depicting victims.

13