

## THE QUEEN V. WEI TANG Information Kit

### Contents

Media release: Sexual slavery laws on trial in landmark High Court appeal .....	2
Media release: High Court to deliver landmark judgement on sexual slavery laws on Thursday (28/8)...	3
Media release: Sex slave victims vindicated by High Court .....	4
Summary of judgements of Gleeson CJ and Haynes J in Wei Tang case .....	5
An open message of thanks to the Justices of the High Court of Australia .....	10
Online media coverage of the Wei Tang appeals .....	13

*Produced January 2009 by Project Respect*

*This publication has been supported with a Small Grant from the Victoria Law Foundation – [www.victorialawfoundation.org.au](http://www.victorialawfoundation.org.au)*

9 May 2008

## **MEDIA RELEASE:**

### **SEXUAL SLAVERY LAWS ON TRIAL IN LANDMARK HIGH COURT APPEAL**

**Australia's laws against sexual slavery will literally be on trial at a two-day appeal before the High Court of Australia, Canberra, commencing on 13<sup>th</sup> May 2008.**

'The case, *The Queen v Wei Tang* is the most crucial test of the effectiveness of our criminal laws against sexual and all other forms of slavery ever to come before an Australian court,' stated Nina Vallins, Joint Co-ordinator of Project Resect Inc, Australia's leading anti-trafficking and slavery non-government organisation.

'The full bench of the High Court will hear arguments about the constitutionality of our criminal laws against slavery, the definition of slavery and what needs to be proven to make out the crime of slavery. The outcome of the Appeal will have huge implications for the protection of people from sexual slavery and servitude and other forms of slavery and servitude,' said Hui Zhou, lawyer working with Project Respect.

The High Court Appeal is a consequence of an Australian Federal Police raid on a brothel in Fitzroy, Melbourne in May 2003. There has been a committal hearing, two trials and a successful appeal by Wei Tang of her slavery conviction in the Victorian Supreme Court of Appeal in the last five years. 'The women who were the subjects of the alleged slavery and courageously testified in each case have remained in virtual limbo for all these years,' said Ms Zhou.

'The slavery laws to be tested in the High Court are almost ten years old. In all this time, there have been only a tiny number of successful prosecutions for slavery and related offences. All Australians should be asking what we need to do differently to better support victims of trafficking, slavery and servitude and to prevent trafficking in the first place through best practice investigations, prosecutions and effective criminal laws,' said Ms Zhou.

'Slavery is defined in Australian and international law as one of the most serious violations of human rights as well as, in certain circumstances, a war crime and a crime against humanity. The human rights of victims of trafficking and slavery must be placed at the centre of the Australian Government's entire approach to preventing and responding to trafficking, slavery and servitude. Nothing less is acceptable. Australia is lagging behind a growing international recognition of the critical link, as shown in Italy, between a human rights-based approach to victim support and the effective criminal prosecutions of perpetrators,' said Ms Vallins.

'Our research and a decade of experience at the coalface of working with trafficked and enslaved women indicates that 1000 women are trafficked into Australia for prostitution every year. There is also evidence that other forms of labour slavery and servitude are also proliferating,' concluded Ms Vallins.

The case is of such significance that the Human Rights and Equal Opportunity Commission will be seeking leave to intervene and make submissions on Australia's international human rights obligations regarding slavery and their application to our anti-slavery laws.

---

**Nina Vallins, Joint Co-ordinator, Project Respect Inc**  
Tel: 03 9416 3401      Email: [info@projectrespect.org.au](mailto:info@projectrespect.org.au)

Media spokespeople will be available prior to and during the Appeal at the High Court, Canberra.

27 August 2008

**MEDIA RELEASE:  
HIGH COURT TO DELIVER LANDMARK JUDGEMENT  
ON SEXUAL SLAVERY LAWS ON THURSDAY (28/8)**

**The High Court will at 10 a.m this Thursday deliver its Judgment on Australia's Criminal Laws against slavery.**

'The case, *The Queen v Wei Tang*' is the most crucial test of the effectiveness of our criminal laws against sexual and all other forms of slavery ever to come before an Australian court.'

The Appeal was heard over two days in Canberra on the 13<sup>th</sup>&14<sup>th</sup> May 2008.

'The full bench of the High Court will deliver judgments that will likely address issues determining the constitutionality of our criminal laws against slavery, the definition of slavery and what needs to be proven to make out the crime of slavery and the applicability of international human rights law on slavery to Australian criminal law.

'The outcome of the Appeal will have huge implications for the protection of people from sexual slavery and servitude and other forms of slavery and servitude as well as the effective prosecution of slavery, trafficking and servitude offences.'

The High Court Appeal is a consequence of an Australian Federal Police raid on a brothel in Fitzroy, Melbourne in May 2003. There has been a committal hearing, two trials and a successful appeal by Wei Tang of her slavery conviction in the Victorian Supreme Court of Appeal in the last five years. 'The five women who were the subjects of the alleged slavery and courageously testified in each case have remained in virtual limbo for all these years.'

'Our research and a decade of experience working at the coalface with trafficked and enslaved women indicates that 1000 women are trafficked into Australia for prostitution every year. There is also evidence that other forms of labour slavery and servitude are also proliferating.'

'Whatever the outcome of the High Court's judgement we urge the Rudd Government to continue to enhance our criminal law and human rights and victims protection regime to more effectively combat human trafficking and slavery.'

---

Media Spokesperson:

Kathleen Maltzahn, author, *Trafficked*, UNSW Press; Founding Director and Committee Member, Project Respect Inc.

Ph: 9416 3401

All quotes can be attributed to Kathleen Maltzahn

The High Court's Judgment will be available soon after 10 a.m at:

<http://www.austlii.edu.au/au/cases/cth/HCA/recent.html>

28 August 2008

**MEDIA RELEASE:**  
**SEX SLAVE VICTIMS VINDICATED BY HIGH COURT**

'The High Court today in a compelling 6-1 majority decision has vindicated the courage and integrity of five women in their long struggle for acknowledgement of and justice for the crimes that were perpetrated against them.'

In the Court's judgements in *R. v. Wei Tang*, six of the seven judges have upheld Australia's anti-slavery criminal laws and defined the crime of slavery in a way that addresses the reality of women trafficked into Australia.

'The High Court in reinstating ten convictions for owning and possessing slaves has recognised that what happened to these women is one of the most serious crimes – a crime against humanity.'

'The implications of the Court's judgement are profound and wide-ranging. One, the Court has provided powerful clarity to investigators, prosecutors, and governments about what elements of slavery need to be proved in order to secure convictions. Two, the Court has embraced a modern understanding of how the crime of slavery operates. Three, the Court has found that consent to come to Australia for prostitution is not equal to consent to enslavement or the conditions of slavery.'

'Today's judgement refutes all of those who have argued that modern-day slavery is nonexistent in this country. It recognises that the use of "contracts" that force women to have sex with 800-900 men are part of the operations of slavery, rather than an acceptable part of prostitution.'

'The legal context is now crystal clear. The onus is on police and prosecutors to step up investigations and prosecutions against the entire spectrum of trafficking, slavery, servitude and debt bondage in this country.'

'The Judgement must also act as a catalyst for the Rudd Government to enact the necessary measures to secure justice in the fight against traffickers. This includes access to visas for victims of trafficking, comprehensive support and rehabilitation, and crimes compensation.'

'The case relied upon the evidence of five women who bravely endured a committal hearing, two trials, and two appeals, at extraordinary personal cost. The Government should also urgently implement additional protections to ensure that other trafficked women do not have to endure the ordeals these five women have been subjected to in repeated court hearings.'

---

Media Spokesperson: Kathleen Maltzahn, author of *Trafficked*, UNSW Press; Founding Director and Committee Member, Project Respect Inc.

All quotes can be attributed to Kathleen Maltzahn

The High Court's Judgement is available at:  
<http://www.austlii.edu.au/au/cases/cth/HCA/recent.html>

## SUMMARY OF JUDGEMENTS OF GLEESON CJ AND HAYNES J IN WEI TANG CASE

### **Facts case**

The respondent owned a licensed brothel in Fitzroy. She had arranged for five Thai women to come to Australia to work as prostitutes. Generally what would occur is that once the women arrived in Australia they would be taken to a apartment or hotel and kept there until a decision was made as to which brothel they would be working at. There was no written contract but there were agreed conditions in terms of a "debt". The women (the complainants) acknowledged a debt usually in the sum of \$40,000 to \$45,000. A sum of \$110 was charged to customers for the complainant's services. However each customer serviced, the complainants' debt would only be reduced by \$50. There was an understanding that once the women had paid off their "debt" they would have the opportunity to earn money on their own account as prostitutes.

On their arrival the women had very little possessions, spoke little English and knew no one in Australia.

### **Terms**

- the women had to work 6 days a week in the respondent's brothel;
- they get 1 free day off (7<sup>th</sup> day);
- serving up to 900 customers over a period of four to six months;
- the women earned nothing in cash;
- if they worked on their free day they could keep the \$50 per customer.

The respondent was convicted of five offences of intentionally possessing a slave, and five offences of intentionally exercising over a slave a power attaching to the right of ownership, namely the power to use, contrary to s 270.3(1)(a) of the Criminal Code (Cth) ("the Code"). She was sentenced to a lengthy term of imprisonment.

### **Why the Judges believes this to be slavery?**

Chief Justice Gleeson considered the following:

#### **Slave/ slavery**

Section 270.3(1)(a) of the *Criminal Code* (Cth) ("the Code") makes it an offence intentionally to possess a slave or to exercise over a slave "any of the other powers attaching to the right of ownership".

#### **Definition of slavery under chapter 8 the Code**

##### **Section 270**

Slavery- is the condition of a person over whom any or all of the powers attaching to the right of ownership are exercised including where such a condition results from a debt or contract made by the person.

Chief Justice Gleeson pointed out that the above definition derived from although it is not identical to the definition of slavery in Art 1 of the 1926 International Convention to Suppress the Slave Trade and Slavery (“the 1926 Slavery Convention”).

## Article 1 of the 1926 Slavery Convention

- (1) Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.
- (2) The slave trade includes all acts involved in the capture, acquisition or disposal of a person with intent to reduce him to slavery; all acts involved in the acquisition of a slave with a view to selling or exchanging him; all acts of disposal by sale or exchange of a slave acquired with a view to being sold or exchanged, and, in general, every act of trade or transport in slaves.

Chief Justice Gleeson noted that the definition refers to the *status* or condition of a person and the *exercise of power* of a person. He then referred to the 1953 Memorandum where the Secretary-General of the United Nations listed such powers as including:

- the capacity to make a person an object of purchase;
- the capacity to use a person and a person’s labour in a substantially unrestricted manner and;
- an entitlement to the fruits of the person’s labour without compensation commensurate to the value of the labour .

Chief Justice Gleeson said that each of those powers was relevant to this case and he applied it as follows:

- the complainants were made an object of purchase;
- for the duration of the contracts the owners had a capacity to use the complainants; and the complainants’ labour in a substantially unrestricted manner; and
- the owners were entitled to the fruits of the complainants’ labour without commensurate compensation

Chief Justice Gleeson referred to the case of *Prosecutor v Kunarac*, before the International Criminal Tribunal for the Former Yugoslavia, where the charges were of “enslavement.” The Trial Chamber identified the following factors to be taken into account:

- control of movement;
- control of physical environment;
- psychological control;
- measures taken to prevent or deter escape;
- force;
- threat of force or coercion;
- duration;
- assertion of exclusivity;
- subjection to cruel treatment and;
- abuse, control of sexuality and forced labour.

Chief Justice Gleeson pointed out that the factors identified in *Kunarac* such as control of moment and control of physical environment, involves questions of degree. He said:

“powers of control, in the context of an issue of slavery, are power of the kind and degree that would attach to a right of ownership if such a right were legally possible, not powers of a kind that are no more than an incident of harsh employment, either generally or at a particular time or place.”

In our case to distinguish between slavery on one hand and harsh and exploitative conditions of labour on the other, Chief Justice Gleeson indicated that this can be found in the nature and extent of the powers exercised over a complainant:

“In particular, a capacity to deal with a complainant as a commodity, and object of sale and purchase, may be a powerful indication that a case falls on one side of the line. So may also the exercise of powers of control over movement which extend well beyond the powers exercised even in the most exploitative of employment circumstances, and absence or extreme inadequacy of payment for services ”

The complainants’ passports and return airfares were retained by the respondent. They lived in premises arranged by the respondent, housed and fed and all medical requirements attended to. They were not kept under lock and key however the trial judge said that in the totality of the circumstances the complainants were effectively restricted to the premises. The trial judge was satisfied on the evidence that the complainants were financially deprived and vulnerable upon arriving in Australia.

Chief Justice Gleeson considered Eames JA judgments in the Court of Appeal where Eames JA states that the

“The offence of possessing a slave...was the respondent’s *appreciation* of the character of her own actions.

“You must be satisfied that the accused was intentionally exercising a power that an owner would have over property and was doing so with the knowledge or in the belief that the complainant was no more than mere property.”

From Eames JA’s statement his Honour thought it was necessary for the prosecution to establish a certain state of knowledge or belief on the part of the respondent as to the source of the powers she was exercising, in addition to an intention to exercise those powers. However in a footnote to his reasons Eames JA said that “it was not necessary to prove that an offender knew that the power to possess or use property was an incident of the right of ownership.” Eames JA contradicts himself and it is difficult to reconcile with his reasoning. As Chief Justice Gleeson pointed out:

“If it is not necessary to prove that the respondent knew what rights of ownership were, it would be curious if it were relevant to consider what she knew or believed about other rights or entitlements. One would have expected that a person could be convicted of the offence of possessing a slave without knowing, or caring, anything about possible alternative sources of right or entitlements.”

Chief Justice Gleeson goes on to say that:

“What the respondent knew or believed about her rights and entitlements as an employer or contractor, as distinct from rights of property, in that perhaps unlikely event that she knew or

believed anything on that subject was not something that the prosecutor had to establish or that the jury had to consider.”

### Summary

Chief Justice Gleeson looked at the power that was exercised over the complainants. He said “the critical powers the exercise of which was disclosed by the evidence were:

- the power to make the complainants an object of purchase;
- the capacity, for the duration of the contracts;
- to use the complainants and their labour in a substantially unrestricted manner;
- the power to control and restrict their movements, and;
- the power to use their services without commensurate compensation.
- It was not necessary for the prosecution to establish that the respondent had any knowledge or belief concerning the source of the powers exercised over the complainants.

### Hayne J

Justice Hayne agreed with Chief Justice Gleeson that:

“The prosecution did not have to prove that the respondent had any knowledge or belief about the source of the powers she exercised over the complainants. What was to be proved was the *intentional possession* and use of each complainant as a slave, which is to say as a person over whom any or all of the powers attaching to the right of ownership were exercised.”

Justice Hayne said that to establish the relevant fault element it was:

“Necessary to show that the respondent meant to engage in the conduct, in respect of each complainant, of exercising powers attaching to the right of ownership.”

### Ownership/ Possession

Justice Hayne explored the powers attaching to the right of ownership. His Justice refers to the ordinary English meaning of the word “ownership” in which one person would have dominion over that other person. Justice Hayne asked two questions:

1. Did the accused possess or exercise some other power attaching to the right of ownership over the complainant? and;
2. Was the complainant a slave?

Justice Hayne referred to the Judgments in the case of *He Kaw Teh v The Queen* in which the judges defined “possession” as being:

- physically in the custody or under the control of the accused (Brennan J)
- reference to the state of affairs in which there is the intentional exercise of physical custody or control over something (Dawson J)

Justice Hayne drew the comparison that possession like ownership refers to “a state of affairs in which there is the complete subjection of that other by the first person.”

## Freedom and Choice

Justice Hayne considered what freedom a person has could determine whether that person was a slave.

Justice Hayne said that

“The way in which all five women were treated in Australia by setting them to work as they did, on the terms that they did, coupled with the restraints on their movement and freedom of other action, permitted a jury to conclude that what the respondent did, when she took up a “share” in four of the women, was to buy them as if they were articles of trade or commerce and thereafter possess and use them.”

His Justice went on to say that despite the fact that the women came to Australia voluntarily “did not preclude the conclusion that each was possessed and used by the respondent as if owned by her.” Once the women had arrived in Australia Justice Hayne said that they had no freedom to choose what was done with them thereafter. The women had no choices and all decisions were to be made by others. He said:

“In this case the evidence permitted the conclusion that the respondent used and possessed each complainant as a slave because it permitted the conclusion, in each case, that the respondent used and possessed the complainant as an item of property at the disposal of those who had bought the complainant regardless of *any* wish she might have.”

*This publication has been supported with a Small Grant from the Victoria Law Foundation – [www.victorialawfoundation.org.au](http://www.victorialawfoundation.org.au)*

## AN OPEN MESSAGE OF THANKS TO THE JUSTICES OF THE HIGH COURT OF AUSTRALIA

*On the 28<sup>th</sup> of August, in a 6-1 decision, the High Court found that brothel owner Wei Tang was guilty of five counts of using and five counts of possessing a slave.*

*On the 14<sup>th</sup> of November 2008, Project Respect ran a seminar with nine Thai and Chinese women who had been trafficked to Australia for prostitution, where Hui Zhou from the Fitzroy Legal Service outlined the key findings in the High Court judgement on the Queen v. Tang.*

*On the 15<sup>th</sup> and 16<sup>th</sup> of November, Project Respect had a weekend away for women in the sex industry, where the women who attended the seminar the previous day developed this shared statement. This is their message:*

We make this statement in response to the 28 August 2008 High Court decision on the Queen v. Tang. We had the same experience as the women in the Wei Tang case.

What happened to us was a nightmare. We can never forget. It comes back to us in dreams. This will affect us til we die. It has changed us.

We were treated very badly. We worked from 11am to 3 or 4 am. We slept only three or four hours a night. Sometimes some of us worked for 24 hours. For four or five months, all we did was prostitution. Even when we had our period, we had to work. Sometimes we worked until we couldn't walk. We had to work until we were very very sick and the customers refused to take us. Only then were we allowed to rest, for one day.

Some owners were not so cruel, but even when they were friendly, they still treated us as slaves.

We were made to feel like animals. Customers were violent. Some of the customers were crazy. They treated us like animals. We were sexually abused, we were dragged, we were hit. Some of us were given drugs so we could work all the time. Some of the women we know have become drug addicts and now they have to keep doing prostitution to pay for drugs.

It was like we were in jail – we had no free time, we couldn't go anywhere, we never had freedom. The traffickers treated us as slaves. We didn't have anywhere to go.

It felt like we survived and died at the same time. We had to keep doing what the traffickers said, for ourselves, and for the people we loved. The traffickers threatened us – we were scared they would hurt us and our families. Some of us thought we could be killed. We blamed ourselves for what happened, because we had wanted to come to Australia.

This changed our lives.

After we had been trafficked, if we met a good man, some of us thought we didn't deserve to be with him, that he deserved someone better. Some of us knew we deserved better, than to be trafficked, but men we loved treated us badly and told us we were dirty and couldn't expect anything better. It was hard to speak when we were treated like that.

Before this High Court decision, we felt the public didn't know what happened to women like us and that they would judge us, and we felt that people like us didn't deserve anything better.

But just because we have been prostitutes doesn't mean we are not good people – we had no choice. We did this to survive.

Even if women chose to do prostitution, they shouldn't be treated this way.

When we were told about the High Court decision, we felt glad. We felt relieved, we felt released. Now we have walked out from the darkness. We can again have a good life, like we did before we came to Australia. We can start a new life now.

We feel now that people believe we are real and understand what we have been through. We feel that the High Court Justices respect and understand us. Because of what happened to us, we didn't trust people. Now it seems there are good people in the world. People outside have believed what happened to us. We feel more valuable.

We agree with the Justices when they say that the situation of the women in the Tang case was slavery. We feel good because the Justices say it doesn't matter what the women did – it was the agents' fault. What they did was slavery.

What should happen now?

We see that even though the government has laws, traffickers still find ways to bring women here. Because each of us has been hurt by slavery, we want to stop other women from being trafficked. We don't want other women to experience what we experienced. We want the government to find more ways to stop slavery.

To help women who have already been hurt by slavery, we want the government to give everyone a new chance. In the past, we felt that people wouldn't give us a chance. Visas are the best thing. Secondly, we need education, so we know how to communicate, so we know how to live in Australia, so we can start a new life. We want help so we can find new jobs, otherwise we have to do the same thing, prostitution. No-one wants to stay with that many men. Of course, we can make a lot of money from prostitution, but it feels there is no respect, no love there.

The High Court judgement has made us happy. We feel we have come from the darkness to the brightness.

The High Court decision is important. Before, all of us were scared to talk. Now, we have hope. We can trust again. We are real. The High Court judgement feels like a blessing, something very good.

Thank you from the heart to the Justices.

16<sup>th</sup> November 2008

The following day, one of the women rang and said she had more to say for the statement. Her additional statement is included here, and supplements the previous statement, which she contributed to and endorses:

It is important that people understand that the experience of being trafficked is absolutely the worst thing you can ever imagine. I want people to know that this is happening in Australia.

Before I came, I had a nice life in Thailand, a nice job. I was tricked by a family member to come here, who sold me.

I experienced the most extreme brutality. I was in a 24-hour brothel, where I was woken at any time to see customers. They didn't wake me up by speaking to me - they kicked me. They made me take speed, so I could keep working. I had a gun pointed at my head.

The people who brought us here are so bad, they damaged not just one but so many lives. It never goes away. They have made it hard for me to trust anyone again.

When someone treats you like a dog for a long time, you start to believe you are a dog. You never get your voice back. You lose your confidence. You feel like you are an animal.

Afterwards, sometimes I felt like I was too dirty to touch my own son. That kind of experience made me feel like I'm not human, makes me feel so dirty, even too dirty to touch my own baby.

Thanks to the Judges, they help so much, they can help people to understand what we have been through.

*These statements have been developed and endorsed by the women mentioned above (they have endorsed the statement having read it in their first language as necessary, as well as English). The women have endorsed that these statements be sent to the High Court Justices, and to politicians, journalist and the wider community, and to women in brothels who may themselves be in slavery or who may be able to help other women they meet in brothels who are.*

***If you would like to write a response to the authors of this statement, please email [info@projectrespect.org.au](mailto:info@projectrespect.org.au).***

#### **Other information**

The Queen v Tang judgement - The Queen v Tang [2008] HCA 39 (28 August 2008) - <http://www.austlii.edu.au/au/cases/cth/HCA/2008/39.html>

Project Respect - [www.projectrespect.org.au](http://www.projectrespect.org.au)

*This publication has been supported with a Small Grant from the Victoria Law Foundation – [www.victorialawfoundation.org.au](http://www.victorialawfoundation.org.au)*

## ONLINE MEDIA COVERAGE OF THE WEI TANG APPEALS

*New legislation helps curb human trafficking*, Platypus magazine, of the Australian Federal Police, March 2009

[http://www.afp.gov.au/data/assets/pdf\\_file/106714/13\\_HumanTrafficking.pdf](http://www.afp.gov.au/data/assets/pdf_file/106714/13_HumanTrafficking.pdf)

*The Wei Tang decision*, ABC Radio National - the Law Report, 2 September 2008

<http://www.abc.net.au/rn/lawreport/stories/2008/2351551.htm>

*High Court reinstates former brothel owner's sex-slavery conviction*, The Herald Sun, August 28 2008

<http://www.news.com.au/heraldsun/story/0,21985,24254377-661,00.html>

*The Queen v. Wei Tang*, High Court of Australia media release, August 28 2008

[http://www.hcourt.gov.au/media/The\\_Queen\\_v\\_Tang.pdf](http://www.hcourt.gov.au/media/The_Queen_v_Tang.pdf)

*Court reinstates sex slave convictions*, The Canberra Times, 29 August 2008

<http://www.canberratimes.com.au/news/local/news/general/court-reinstates-sex-slave-convictions/1257294.aspx?storypage=0#>

*Sex slavery on high*, The Australian, Natalie O'Brien and Elisabeth Wynhausen, May 17 2008

<http://www.theaustralian.news.com.au/story/0,25197,23710453-28737,00.html>

*DPP to test laws in slavery case*, The Australian, Natalie O'Brien and Elisabeth Wynhausen, May 15 2008

<http://www.theaustralian.news.com.au/story/0,25197,23700912-17044,00.html>

*Slavery in the 21<sup>st</sup> Century*, ABC Radio National - the Law Report, 13 May 2008

<http://www.abc.net.au/rn/lawreport/stories/2008/2241462.htm#transcript>

ABC News Radio, 13 May 2008: <http://www.abc.net.au/news/stories/2008/05/13/2242867.htm>

*Madam or Slave Owner*, The Age, Karen Kissane, 16 May 2008

<http://www.theage.com.au/news/national/madam-or-slave-owner/2008/05/16/1210765176472.html>

*Sexual servitude 'not slavery'*, The Age, Karen Kissane, 15 May 2008

<http://www.theage.com.au/news/national/sexual-servitude-not-slavery/2008/05/14/1210764953675.html>

*A question of bondage*, The Age, Dr Anne Gallagher, 14 May 2008

<http://www.theage.com.au/news/opinion/a-question-of-bondage/2008/05/14/1210444528872.html>

*Judge warns many could be snared by slavery laws*, The Age, Karen Kissane, 14 May 2008

<http://www.theage.com.au/news/national/judge-warns-many-could-be-snared-by-slavery-laws/2008/05/13/1210444438501.html>

*Anti-Slavery laws face test in court*, AAP, printed by the Sydney Morning Herald and the Brisbane Times, 13 May 2008

<http://news.smh.com.au/national/antislavery-laws-face-test-in-court-20080512-2d8y.html>