

**DECLARATION OF SARAH L. BESSELL,  
ON BEHALF OF THE HUMAN TRAFFICKING LEGAL CENTER**

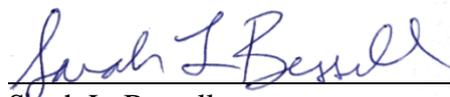
*Petition Alleging Violations by the United States of America of the Human Rights of Domestic  
Workers Employed by Diplomats*

1. My name is Sarah L. Bessell. I am the Deputy Director of the Human Trafficking Legal Center, a non-profit organization dedicated to helping survivors obtain justice. Since its inception in 2012, the Human Trafficking Legal Center has trained more than 4,000 attorneys at top law firms across the country to handle civil trafficking cases pro bono, connected more than 300 individuals with pro bono representation, and educated more than 25,000 community leaders on victims' rights. The organization advocates for justice for all victims of human trafficking.
2. The Human Trafficking Legal Center maintains comprehensive databases of federal civil and criminal trafficking cases filed in U.S. federal courts. These databases contain many cases involving the trafficking of domestic workers for forced labor. In domestic servitude<sup>1</sup> cases, traffickers hold their victims in involuntary servitude in the home, requiring them to cook, clean, and, in some cases, to care for children or elderly members of the household. Victims alleging domestic servitude often describe being subjected to inhumane living conditions and forced to work around the clock for little or no pay.<sup>2</sup>
3. Domestic servitude cases account for just 14% of federal criminal labor trafficking cases charged since 2009.<sup>3</sup> Domestic servitude cases make up 23.5% of all federal civil trafficking cases filed in the U.S. courts.<sup>4</sup> These figures do not capture the full extent of domestic servitude cases in the United States. These numbers underestimate the extent of this abuse due to the paucity of federal forced labor prosecutions<sup>5</sup> and the difficulty survivors face in filing civil lawsuits. Nevertheless, civil and criminal court dockets do provide insight into domestic servitude in the United States.
4. Domestic servitude is a problem that overwhelmingly impacts female migrant workers. In all U.S. federal criminal prosecutions involving the trafficking of domestic workers brought since 2009, the victims were female. On the civil side, 93% of federal civil cases alleging domestic servitude (99 total) were filed by women. The majority of domestic worker victims are foreign-born nationals who have been recruited to work in the United States.<sup>6</sup> In a large number of federal criminal and civil trafficking cases, victims have legal visas to work as domestic workers.<sup>7</sup> A large number of federal civil trafficking cases have been filed by A-3 and G-5 visa holders who were trafficked by diplomats or international officials.<sup>8</sup> Criminal prosecutions of employers of A-3 and G-5 domestic workers -- indeed prosecutions of any employers of domestic workers -- are rare in the United States. And prosecution of cases involving officials with diplomatic immunity, are practically non-existent.<sup>9</sup>
5. Regardless of visa type, immigration status renders domestic workers vulnerable to traffickers. Unscrupulous employers threaten foreign workers with revocation of their employment sponsorship, blacklisting, or even deportation to coerce the workers into domestic servitude. Threats of deportation are a common means of coercion in trafficking cases. In more than two-thirds of federal civil cases involving domestic workers (69 total), defendants allegedly threatened victims with deportation in order to compel their labor.<sup>10</sup> Threats of deportation were alleged in about half of all federal criminal domestic servitude prosecutions (16 total).<sup>11</sup>

6. Physical and sexual violence are common features in domestic servitude cases. More than 40% of federal civil domestic servitude cases (45 total) involved actual physical violence (27% or 29 cases)<sup>12</sup> or threats of violence (15% or 16 cases).<sup>13</sup> In federal criminal domestic servitude cases, the rate of violence or threats of violence was even higher. More than 60% of cases (22 total) involved actual violence (60% or 21 cases)<sup>14</sup> or threats of violence (3% or 1 case).<sup>15</sup> In Minnesota, an employer was sentenced to one year in prison after she pled guilty to holding a domestic worker in forced labor. In addition to forcing the domestic worker to work 18-hour days, the defendant subjected her to constant physical abuse, including punching, kicking, and tearing out the victim's hair.<sup>16</sup> In California, a couple was sentenced to over 15 years in prison for recruiting domestic workers from India and forcing them into domestic servitude. The couple physically abused their victims, in one incident slamming a victim's hands on a gas stove, causing her to suffer first and second degree burns.<sup>17</sup>
7. Sexual violence against domestic workers occurred in 16% of federal civil domestic servitude cases (18 total).<sup>18</sup> Again, the figure was higher in federal criminal cases, with 40% of prosecutions (14 total) alleging sexual violence.<sup>19</sup> Case dockets indicate that domestic workers are subjected to sexual harassment,<sup>20</sup> or forced to give sexual massages to male employers.<sup>21</sup> In more extreme cases, domestic workers were sexually assaulted or raped by their employers or male members of the household.
8. Many domestic workers are denied access to adequate medical care by their employer-traffickers. This abuse was alleged in roughly half of federal civil domestic servitude cases<sup>22</sup> (52 cases) and in about a third of federal criminal prosecutions (12 cases).<sup>23</sup> Some medical conditions may begin as minor issues, but become serious when left untreated. In a civil trafficking case brought in Washington, D.C., *Mazengo v. Mzengi*, a Tanzanian diplomat and his wife held a young woman in domestic servitude for four years, paying her nothing.<sup>24</sup> During this time, the victim suffered severe ingrown toenails that went untreated for years. She was unable to wear shoes or walk without pain. Traffickers finally allowed her to see a doctor; her condition required surgery to remove the ingrown toenails.<sup>25</sup> The doctor told the victim that if she had waited any longer to seek medical treatment she might have lost her toes.<sup>26</sup>
9. Severe medical conditions, left untreated, are sometimes a factor motivating an escape attempt. In *United States v. Al Homoud*, a case prosecuted in Texas, a Qatari military official and his spouse held two women in domestic servitude for eight months. One victim suffered excruciating pain, but was denied medical treatment. Eventually, she told the court, she felt that she had no choice but to run away and "beg for money for food and medicine." This victim was later diagnosed with cancer.<sup>27</sup> Domestic workers are also denied access to dental care. In *Lagasan v. Al-Ghasel*, a domestic worker experienced severe tooth pain but was not allowed to go to the dentist. Following her escape, the victim was required to have seven teeth pulled.<sup>28</sup>
10. In some cases, employers recruit domestic workers with promises of educational opportunities in the United States. The trafficker-employers then deny domestic workers' access to education. Approximately one in ten survivors in federal civil domestic servitude cases experienced limited access to education.<sup>29</sup> A quarter of victims in criminal prosecutions of the perpetrators experienced denial of education.<sup>30</sup> Victims have been promised and denied access to English classes,<sup>31</sup> nursing school,<sup>32</sup> and continuing or general education.<sup>33</sup>

11. Employers frequently create a climate of fear, causing domestic workers to remain in situations of forced labor or involuntary servitude due to fear of arrest or deportation. In *Cruz v. Maypa*,<sup>34</sup> for example, the court of appeals found that the defendants had held the victim as a virtual prisoner by “confiscat[ing] her passport, isolat[ing] her from other people, monitor[ing] her communications, and threaten[ing] that she would be imprisoned and deported if she tried to escape.”<sup>35</sup>
12. These threats can continue even after a domestic worker escapes. More than a quarter of civil domestic servitude cases included allegations that employers used retaliatory or intimidation-based tactics to limit domestic workers’ access to courts.<sup>36</sup> Similar attempts to limit access to courts occurred in about 15% of criminal cases.<sup>37</sup> In *Kiwanuka v. Bakilana*,<sup>38</sup> a domestic worker was allegedly trafficked from Tanzania on a G-5 visa by an employee of the World Bank. The employer promised that she could finish her studies in the United States.<sup>39</sup> Kiwanuka was able to escape with the help of the FBI. Federal authorities prosecuted Bakilana for lying to the FBI, ordering her to pay restitution of \$41,626.80 to Kiwanuka in back wages.<sup>40</sup> Defendants allegedly began searching for the victim, making inquiries about her location with her family back in Tanzania. Kiwanuka stated that she was fearful for her safety and forced to live in hiding.<sup>41</sup>
13. Criminal and civil court documents paint a picture of common elements of the abuse and exploitation of domestic workers. The data of the Human Trafficking Legal Center also illustrate that domestic workers often must resort to federal civil cases in order to have a day in court. Domestic servitude federal prosecutions overall are low: just 39 cases since 2009. In the same period, 2009 to January 2021, domestic workers brought 108 civil cases in the federal courts alleging forced labor and/or involuntary servitude. This failure to prosecute domestic servitude cases is simply part of a larger phenomenon in the United States: a failure to prosecute labor trafficking cases generally. In FY 2020, the U.S. Government prosecuted 210 human trafficking cases; only 14 of those cases were for labor trafficking.<sup>42</sup>
14. The subset of diplomatic/international organization domestic servitude cases paints an even more stark portrait of the de facto impunity that abusive employers enjoy in the United States. Since 2009, federal prosecutors have brought only 11 criminal cases against perpetrators alleged to have held A-3 or G-5 domestic worker visa-holders in forced labor. In contrast, domestic workers with A-3 and G-5 visas brought 38 civil cases against their employers in the same period.

I swear under penalty of perjury that the foregoing declaration is true and correct.

  
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Sarah L. Bessell

March 1, 2021  
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Date

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<sup>1</sup> “Domestic servitude” is a term of art synonymous with the forced labor and involuntary servitude of domestic workers. The U.S. Department of State defines domestic servitude as, “[i]nvoluntary domestic servitude is a form of human trafficking found in distinct circumstances—work in a private residence—that create unique vulnerabilities for victims.” See U.S. Dep’t of State, *What is Modern Slavery?*, <https://www.state.gov/what-is-modern-slavery/#domestic>.

<sup>2</sup> See e.g. Report and Recommendation at 8, 9, *Lagasan v. Al-Ghasel*, 1:14-cv-01035 (E.D. Va. Feb. 18, 2015) (plaintiff forced to work up to 19 hours per day, seven days per week, cleaning, cooking, laundering, and caring for defendants’ children, denied access to medical care, isolated from the outside world, and forced to sleep on a closet floor).

<sup>3</sup> Since 2009, the U.S. government reports that it has filed 212 criminal labor trafficking cases in the federal courts. See U.S. Dep’t of State, *Trafficking in Persons Report*, 2010 - 2020. For FY 2020 data, see U.S. Dep’t of Justice, *Justice Department Recognizes the 10th Annual Human Trafficking Prevention Month* (Jan. 29, 2021), <https://www.justice.gov/opa/pr/justice-department-recognizes-10th-annual-human-trafficking-prevention-month>. Of these, the Human Trafficking Legal Center has identified 39 cases of domestic servitude filed under federal trafficking laws found at Chapter 77 of Title 18 of the U.S. Code. Data on file with the Human Trafficking Legal Center.

<sup>4</sup> Since 2003, trafficking victims have filed 460 cases under the Trafficking Victims Protection Reauthorization Act’s private right of action. Of those, 108 have been filed by victims of domestic servitude. Data on file with the Human Trafficking Legal Center.

<sup>5</sup> The U.S. government reports that it filed only 12 forced labor prosecutions in fiscal year 2019. See U.S. Dep’t of State, *Trafficking in Persons Report*, 2020. Only 14 forced labor prosecutions were filed in fiscal year 2020. See U.S. Dep’t of Justice, *Justice Department Recognizes the 10th Annual Human Trafficking Prevention Month* (Jan. 29, 2021), <https://www.justice.gov/opa/pr/justice-department-recognizes-10th-annual-human-trafficking-prevention-month>.

<sup>6</sup> All federal civil domestic servitude lawsuits have been filed by foreign-born victims. Four criminal cases, stemming from three unique trafficking incidents, involved U.S. citizen victims. In two of those cases, the U.S. citizen victims had cognitive or developmental disabilities, see *US v. Brown (Daniel)*, 1:13-cr-00341 (N.D. Oh.); *US v. Callahan (Jordie) et al*, 1:13-cr-00339 (N.D. Oh.); *US v. Knope (Raylaine) et al*, 2:18-cr-00160 (E.D. La.), while the third victim was a minor, see *US v. Soe (Yan) et al*, 1:09-cr-00031 (W.D. N.Y.).

<sup>7</sup> See Human Trafficking Legal Center, *Federal and Criminal Civil Trafficking Cases Involving Legal Visas* (2020), <https://www.htlegalcenter.org/wp-content/uploads/Federal-Trafficking-Cases-Involving-Legal-Visas.pdf>.

<sup>8</sup> Thirty-eight civil trafficking lawsuits have been filed by A-3/G-5 domestic workers, equating to 35% of all domestic servitude civil cases filed in the U.S. federal courts. See *Ayapponey v. Kunikiranman*, 1:08-cv-04133 (N.D. Ill.); *Baoanan v. Baja*, 1:08-cv-05692 (S.D. N.Y.); *Barjo v. Cherian*, 8:18-cv-01587 (D. Md.); *Bhardwaj v. Dayal*, 1:11-cv-04170 (S.D. N.Y.); *Butigan v. Al-Malki*, 1:13-cv-00514 (E.D. Va.); *Carazani v. Zegarra*, 1:12-cv-00107 (D.D.C.); *Chere v. Taye*, 2:04-cv-06264 (D. N.J.); *Cruz v. Maypa*, 1:13-cv-00862 (E.D. Va.); *Doe v. Amal*, 1:12-cv-01359 (E.D. Va.); *Doe v. Khobragade*, 1:18-cv-11134 (S.D. N.Y.); *Doe v. Penzato*, 3:10-cv-05154 (N.D. Cal.); *Doe v. Siddig*, 1:10-cv-01256 (D.D.C.); *Doe v. Zinsou*, 1:19-cv-07025 (S.D. N.Y.); *Elat v. Ngoubene*, 8:11-cv-2931 (D. Md.); *Gurung v. Malhotra*, 1:10-cv-05086 (S.D. N.Y.); *Hussain v. Shaukat*, 1:16-cv-00322 (E.D. Va.); *Jeganathan v. Krishnan*, 1:16-cv-06784 (S.D. N.Y.); *Judavar v. Al Mannai*, 1:11-cv-00625 (D.D.C.); *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C.); *Kunamwene v. Mwoombola et al*, 1:19-cv-01957 (D.D.C.); *Laamime v. Abouzaid*, 1:13-cv-00793 (E.D. Va.); *Leo v. Al Naser*, 1:08-cv-01263 (D.D.C.); *Lipenga v. Kambalame*, 8:14-cv-03980 (D. Md.); *Maysaroh v. American Arab Communications, LLC*, 1:13-cv-01743 (D.D.C.) (later 1:14-cv-00866 (E.D. Va.)); *Mazengo v. Mzengi*, 1:07-cv-00756 (D.D.C.); *Nabong v. Paddayuman*, 1:17-cv-00400 (D.D.C.); *Oluoch v. Orina*, 11-cv-3117 (S.D. N.Y.) (later 1:14-cv-421 (S.D. N.Y.)); *Ouedraogo v. Bonkougou*, 1:15-cv-01345 (S.D. N.Y.); *Pattaiso v. Alahmad*, 1:14-cv-00041 (M.D. Pa.); *Rana v. Islam*, 1:14-cv-1993 (S.D. N.Y.); *Rios Fun v. Pulgar*, 2:13-cv-03679 (D. N.J.); *Sabbithi v. Al Saleh*, 1:07-cv-115 (D.D.C.); *Sakala v. Milunga*, 8:16-cv-00790 (D. Md.); *Sulaiman v. Laram*, 1:16-cv-08182 (S.D. N.Y.); *Tamang v. Mehra*, 1:17-cv-00370 (E.D. Va.); *Tekle v. Al Saud*, 1:18-cv-00211 (E.D. Va.); *Villarreal v. Tenorio*, 8:11-cv-2147 (D. Md.); *Waru v. Madhvani*, 1:05-cv-00662 (D.D.C.).

<sup>9</sup> The U.S. Department of State can request a waiver of immunity from a diplomat’s host country, but as of 2016, this had only occurred two times in human trafficking cases. See *United States v. Soborun*, 2:12-mj-03121 (D. N.J.); *United States v. Khobragade*, 1:14-cr-00176 (S.D. N.Y.); *Martina E. Vandenberg & Sarah Bessell*, *Diplomatic Immunity and the Abuse of Domestic Workers: Criminal and Civil Remedies in the United States*, 26 DUKE J. COMP. & INT’L L. 595, 619 n.216 (2016); *Martina E. Vandenberg*, *Opinion, Diplomats Who Commit Domestic-Worker*

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*Crimes Shouldn't Get a Free Pass*, WASHINGTON POST (Jan. 1, 2014),

[https://www.washingtonpost.com/opinions/diplomats-who-commit-domestic-worker-crimes-shouldnt-get-a-free-pass/2014/01/01/61b750b6-719d-11e3-9389-09ef9944065e\\_story.html](https://www.washingtonpost.com/opinions/diplomats-who-commit-domestic-worker-crimes-shouldnt-get-a-free-pass/2014/01/01/61b750b6-719d-11e3-9389-09ef9944065e_story.html).

<sup>10</sup> See *Ayapponey v. Kunikiraman*, 1:08-cv-04133 (N.D.Ill.); *C.G.B. v. Santa Lucia*, 2:15-cv-03401 (D.N.J.); *Daniel v. Madumere*, 4:19-cv-01945 (S.D.Tex.); *Mbome v. Njie*, 4:18-cv-00597 (N.D.Tex.); *Barjo v. Cherian*, 8:18-cv-01587 (D.Md.); *Bhardwaj v. Dayal*, 1:11-cv-04170 (S.D.N.Y.); *Butigan v. Al-Malki*, 1:13-cv-00514 (E.D.Va.); *Carazani v. Zegarra*, 1:12-cv-00107 (D.D.C.); *Dumapias v. Haybyrne*, 1:20-cv-00297 (E.D.Va.); *Chere v. Taye*, 2:04-cv-06264 (D.N.J.); *Cruz v. Maypa*, 1:13-cv-00862 (E.D.Va.); *Baxla v. Chaudhri*, 1:16-cv-01218 (E.D.Va.); *Doe v. Amal*, 1:12-cv-01359 (E.D.Va.); *Doe v. Howard*, 1:11-cv-01105 (E.D.Va.); *DSouza v. Lobo*, 2:09-cv-00410 (E.D.N.Y.); *Fernandes v. Hayes*, 6:11-cv-00137 (W.D.Tex.); *Woods v. Armand*, 1:17-cv-02550 (E.D.N.Y.); *Jose v. Joshua et al*, 2:19-cv-04583 (E.D.N.Y.); *Abafita v. Aldukhan*, 1:16-cv-06072 (S.D.N.Y.); *Doe v. Penzato*, 3:10-cv-05154 (N.D.Cal.); *Lagayan v. Odeh*, 1:15-cv-01953 (D.D.C.); *Hara v. Mak*, 2:13-cv-02924 (E.D.N.Y.); *Doe v. Zinsou*, 1:19-cv-07025 (S.D.N.Y.); *Midjan v. Chan*, 3:07-cv-01977 (N.D.Cal.); *Franco v. Diaz*, 1:14-cv-1909 (E.D.N.Y.); *Garcia v. Curtright*, 6:11-cv-06407 (D.Or.); *Gurung v. Malhotra*, 1:10-cv-05086 (S.D.N.Y.); *Lagasan v. Al-Ghasel*, 1:14-cv-01035 (E.D.Va.); *Hernandez v. Attisha*, 3:09-cv-02257 (S.D.Cal.); *Jeganathan v. Krishnan*, 1:16-cv-06784 (S.D.N.Y.); *Judavar v. Al Mannai*, 1:11-cv-00625 (D.D.C.); *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C.); *Kunamwene v. Mwoombola et al*, 1:19-cv-01957 (D.D.C.); *Laamime v. Abouzaid*, 1:13-cv-00793 (E.D.Va.); *Blanco v. Perdomo*, 1:13-cv-20374 (S.D.Fla.); *Lama v. Malik*, 2:13-cv-02846 (E.D.N.Y.); *Lipenga v. Kambalame*, 8:14-cv-03980 (D.Md.); *Bibi v. Shakil-v. Ur-Rahman et al.*, 1:20-cv-10478 (E.D.Va.); *Oh v. Choi*, 1:11-cv-03764 (E.D.N.Y.); *Mazengo v. Mzengi*, 1:07-cv-00756 (D.D.C.); *Paucar v. Marquez*, 13-cv-24067 (S.D.Fla.); *Ramos v. Hoyle*, 1:08-cv-21809 (S.D.Fla.); *Moulouki v. Epee*, 1:14-cv-05532 (N.D.Ill.); *Nabong v. Paddayuman*, 1:17-cv-00400 (D.D.C.); *Ndukwe v. Ndukwe*, 2:09-cv-06443 (D.N.J.); *Oluoch v. Orina*, 11-cv-3117 (S.D.N.Y.) (later: 1:14-cv-421 (S.D.N.Y.)); *Bergado v. Velonza*, 2:17-cv-09070 (C.D.Cal.); *Bolocon v. Sermoneta*, 1:16-cv-00521 (S.D.N.Y.); *Ouedraogo v. Bonkougou*, 1:15-cv-01345 (S.D.N.Y.); *Pattaiso v. Alahmad*, 1:14-cv-00041 (M.D.Pa.); *Ara v. Khan*, 1:07-cv-1251 (E.D.N.Y.); *Eusebio v. Assaf*, 1:11-cv-00811 (N.D.Ill.); *Martinez v. Calimlim*, 2:08-cv-00810 (E.D.Wis.); *Masangcay v. Kamenetskaya*, 1:18-cv-03666 (E.D.N.Y.); *Mortal v. Nolasco*, 1:10-cv-06008 (E.D.N.Y.); *Roncesvalles v. Gulec*, 0:19-cv-60495 (S.D.Fla.); *Suarez v. Scudder*, 2:18-cv-05777 (E.D.N.Y.); *Sabbithi v. Al Saleh*, 1:07-cv-115 (D.D.C.); *Sakala v. Milunga*, 8:16-cv-00790 (D.Md.); *Sulaiman v. Laram*, 1:16-cv-08182 (S.D.N.Y.); *Salgado v. Gunawardane*, 2:04-cv-7378 (C.D.Cal.); *Dlamini v. Babb*, 1:13-cv-02699 (N.D.Ga.); *Tekle v. Al Saud*, 1:18-cv-00211 (E.D.Va.); *Nassali v. Kanya*, 8:19-cv-02444 (D.Md.); *Canal v. de la Rosa Dann*, 09-cv-3366 (N.D.Cal.); *Villarreal v. Tenorio*, 8:11-cv-2147 (D.Md.); *Mendoza v. Valdavia*, 1:19-cv-08011 (N.D.Ill.); *Waru v. Madhvani*, 1:05-cv-00662 (D.D.C.); *Mugambiwa v. Chiweshe*, 1:17-cv-02541 (D.Md.).

<sup>11</sup> See *US v. Albarghuthi (Huthaifa) et al*, 3:10-cr-00339 (N.D.Tex.); *US v. Aman (Zahida) et al*, 3:19-cr-00085 (E.D.Va.); *US v. Babb (Juna) et al*, 1:09-cr-00520 (N.D.Ga.); *US v. Bello (Bidemi)*, 1:10-cr-00397 (N.D.Ga.); *US v. Ding (Fang Ping) et al*, 4:09-cr-00573 (N.D.Cal.); *US v. Edwards (Alfred) et al*, 8:11-cr-00316 (D.Md.); *US v. Homoud (Hassan) et al*, 5:15-cr-00391 (W.D.Tex.); *US v. Hunaity (Alia)*, 1:18-cr-00723 (D.N.J.); *US v. Jensen (Donald) et al*, 4:12-cr-00085 (S.D.Iowa); *US v. Kartan (Satish) et al*, 2:16-cr-00217 (E.D.Cal.); *US v. Kenit (Edk) et al*, 3:11-cr-05182 (W.D.Wash.); *US v. Mondragon (Angel) et al*, 2:15-cr-00386 (W.D.Wash.); *US v. Murra (Olga)*, 4:16-cr-00078 (N.D.Tex.); *US v. Nsobundu (Chudy) et al*, 4:16-cr-00089 (S.D.Tex.); *US v. Sihombing (Elina) et al*, 2:11-cr-02237 (D.N.M.); *US v. Tolan (Mervat) et al*, 1:11-cr-00526 (E.D.Va.).

<sup>12</sup> See *Edwards v. Edwards*, 8:12-cv-03761 (D.Md.); *Baoanan v. Baja*, 1:08-cv-05692 (S.D.N.Y.); *Balite v. Bishman*, 6:11-cv-6252 (D.Or.); *Mistry v. Udwardia*, 5:12-cv-00034 (W.D.Ok.); *Daniel v. Madumere*, 4:19-cv-01945 (S.D.Tex.); *Mbome v. Njie*, 4:18-cv-00597 (N.D.Tex.); *Doe v. Pletin*, 2:18-cv-06974 (E.D.N.Y.); *Guobadia v. Irowa*, 2:12-cv-4042 (E.D.N.Y.); *Brojer v. Kuriakose*, 2:11-cv-03156 (E.D.N.Y.); *Samirah v. Sabhnani*, 2:08-cv-2970 (E.D.N.Y.); *Chere v. Taye*, 2:04-cv-06264 (D.N.J.); *Meda v. Kogda*, 1:17-cv-06853 (S.D.N.Y.); *Woods v. Armand*, 1:17-cv-02550 (E.D.N.Y.); *Lagayan v. Odeh*, 1:15-cv-01953 (D.D.C.); *Doe v. Zinsou*, 1:19-cv-07025 (S.D.N.Y.); *Franco v. Diaz*, 1:14-cv-1909 (E.D.N.Y.); *Hussain v. Shaukat*, 1:16-cv-00322 (E.D.Va.); *Judavar v. Al Mannai*, 1:11-cv-00625 (D.D.C.); *Garnica v. Edwards*, 1:13-cv-3943 (S.D.N.Y.); *Leo v. Al Naser*, 1:08-cv-01263 (D.D.C.); *Oh v. Choi*, 1:11-cv-03764 (E.D.N.Y.); *Mazengo v. Mzengi*, 1:07-cv-00756 (D.D.C.); *Ara v. Khan*, 1:07-cv-1251 (E.D.N.Y.); *Rana v. Islam*, 1:14-cv-1993 (S.D.N.Y.); *Rong v. Hong Kong Entertainment, Ltd.*, 1:05-cv-48 (N.M.I.); *Roe v. Howard*, 1:16-cv-00562 (E.D.Va.); *Sabbithi v. Al Saleh*, 1:07-cv-115 (D.D.C.); *Velez v. Sanchez*, 1:04-cv-04797 (E.D.N.Y.); *Canal v. de la Rosa Dann*, 09-cv-3366 (N.D.Cal.).

<sup>13</sup> See *Arma v. Prakoso*, 8:14-cv-03113 (D.Md.); *Butigan v. Al-Malki*, 1:13-cv-00514 (E.D.Va.); *Dumapias v. Haybyrne*, 1:20-cv-00297 (E.D.Va.); *Doe v. Amal*, 1:12-cv-01359 (E.D.Va.); *Abafita v. Aldukhan*, 1:16-cv-06072 (S.D.N.Y.); *Doe v. Khobragade*, 1:18-cv-11134 (S.D.N.Y.); *Doe v. Penzato*, 3:10-cv-05154 (N.D.Cal.); *Elat v.*

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Ngoubene, 8:11-cv-2931 (D.Md.); Gurung v. Malhotra, 1:10-cv-05086 (S.D.N.Y.); Lagasan v. Al-Ghasel, 1:14-cv-01035 (E.D.Va.); Laamime v. Abouzaid,, 1:13-cv-00793 (E.D.Va.); Moulouki v. Epee, 1:14-cv-05532 (N.D.Ill.); Oluoch v. Orina, 1:14-cv-421 (S.D.N.Y.) (prev: 11-cv-3117 (S.D.N.Y.)); Ouedraogo v. Bonkougou, 1:15-cv-01345 (S.D.N.Y.); Pattaiso v. Alahmad, 1:14-cv-00041 (M.D.Pa.); Waru v. Madhvani, 1:05-cv-00662 (D.D.C.).

<sup>14</sup> See US v. Ac-Salazar (Santos) et al, 1:20-cr-00700 (N.D.Ill.); US v. Albarghuthi (Huthaifa) et al, 3:10-cr-00339 (N.D.Tex.); US v. Avelenda (Jose), 2:11-cr-00949 (C.D.Cal.); US v. Bello (Bidemi), 1:10-cr-00397 (N.D.Ga.); US v. Brown (Daniel), 1:13-cr-00341 (N.D.Oh.); US v. Callahan (Jordie) et al, 1:13-cr-00339 (N.D.Oh.); US v. Cros-Toure (Denise) et al, 4:18-cr-00230 (N.D.Tex.); US v. Ding (Fang Ping) et al, 4:09-cr-00573 (N.D.Cal.); US v. Huang (Lili), 0:16-cr-00263 (D.Minn.); US v. Hunaity (Alia), 1:18-cr-00723 (D.N.J.); US v. Kartan (Satish) et al, 2:16-cr-00217 (E.D.Cal.); US v. Knope (Raylaine) et al, 2:18-cr-00160 (E.D.La.); US v. Majeed (Firas) et al, 3:16-cr-00819 (S.D.Cal.); US v. Mondragon (Angel) et al, 2:15-cr-00386 (W.D.Wash.); US v. Murra (Olga), 4:16-cr-00078 (N.D.Tex.); US v. Nsobundu (Chudy) et al, 4:16-cr-00089 (S.D.Tex.); US v. Paz-Rodriguez (Ronald) et al, 4:20-cr-00082 (N.D.Okla.); US v. Penzato (Giuseppe) et al, 3:12-cr-00089 (N.D.Cal.); US v. Sihombing (Elina) et al, 2:11-cr-02237 (D.N.M.); US v. Soe (Yan) et al, 1:09-cr-00031 (W.D.N.Y.); US v. Toviave (Jean Claude), 2:11-cr-20259 (E.D.Mich.).

<sup>15</sup> US v. Yannai (Joseph), 1:10-cr-00594 (E.D.N.Y.).

<sup>16</sup> See U.S. Dep't of Justice, *Woodbury Woman Sentenced To Prison In Labor Trafficking Case* (Aug. 24, 2017), <https://www.justice.gov/usao-mn/pr/woodbury-woman-sentenced-prison-labor-trafficking-case>.

<sup>17</sup> See U.S. Dep't of Justice, *Former Stockton Couple Convicted of Human Trafficking Charges Related to Forced Labor of Foreign Nationals* (Mar. 18, 2019), <https://www.justice.gov/usao-edca/pr/former-stockton-couple-convicted-human-trafficking-charges-related-forced-labor-foreign>. See also U.S. Dep't of Justice, *Husband Sentenced to over 15 Years in Prison for Human Trafficking Convictions Related to Forced Labor of Foreign Nationals* (Oct. 22, 2020), <https://www.justice.gov/usao-edca/pr/husband-sentenced-over-15-years-prison-human-trafficking-convictions-related-forced>.

<sup>18</sup> See Arma v. Prakoso, 8:14-cv-03113 (D.Md.); Balite v. Bishman, 6:11-cv-6252 (D.Or.); Chere v. Taye, 2:04-cv-06264 (D.N.J.); Doe v. Amal, 1:12-cv-01359 (E.D.Va.); Doe v. Howard, 1:11-cv-01105 (E.D.Va.); Doe v. Penzato, 3:10-cv-05154 (N.D.Cal.); Doe v. Pletin, 2:18-cv-06974 (E.D.N.Y.); Doe v. Zinsou, 1:19-cv-07025 (S.D.N.Y.); Josenia Ferreyra Santos v. Villalona et al., 1:20-cv-05253 (S.D.N.Y.); Judavar v. Al Mannai, 1:11-cv-00625 (D.D.C.); Leo v. Al Naser, 1:08-cv-01263 (D.D.C.); Maysaroh v. American Arab Communications, LLC, 1:13-cv-01743 (D.D.C.) (later 1:14-cv-00866 (E.D.Va.)); Mistry v. Udwardia, 5:12-cv-00034 (W.D.Ok.); Nabong v. Paddayuman, 1:17-cv-00400 (D.D.C.); Ouedraogo v. Bonkougou, 1:15-cv-01345 (S.D.N.Y.); Paucar v. Marquez, 13-cv-24067 (S.D.Fla.); Roe v. Howard, 1:16-cv-00562 (E.D.Va.); Woods v. Armand, 1:17-cv-02550 (E.D.N.Y.).

<sup>19</sup> See US v. Albarghuthi (Huthaifa) et al, 3:10-cr-00339 (N.D.Tex.); US v. Andres (Javier) et al, 2:14-cr-01461 (D.Az.); US v. Avelenda (Jose), 2:11-cr-00949 (C.D.Cal.); US v. Brown (Daniel), 1:13-cr-00341 (N.D.Oh.); US v. Callahan (Jordie) et al, 1:13-cr-00339 (N.D.Oh.); US v. Jensen (Donald) et al, 4:12-cr-00085 (S.D.Iowa); US v. Kenit (Edk) et al, 3:11-cr-05182 (W.D.Wash.); US v. Mondragon (Angel) et al, 2:15-cr-00386 (W.D.Wash.); US v. Nnaji (Ngozi) et al, 4:09-cr-00172 (N.D.Tex.); US v. Penzato (Giuseppe) et al, 3:12-cr-00089 (N.D.Cal.); US v. Soe (Yan) et al, 1:09-cr-00031 (W.D.N.Y.); US v. Tolan (Mervat) et al, 1:11-cr-00526 (E.D.Va.); US v. Toviave (Jean Claude), 2:11-cr-20259 (E.D.Mich.); US v. Yannai (Joseph), 1:10-cr-00594 (E.D.N.Y.).

<sup>20</sup> Edwards v. Edwards, 8:12-cv-03761 (D.Md.); Maysaroh v. American Arab Communications, LLC, 1:13-cv-01743 (D.D.C.) (later 1:14-cv-00866 (E.D.Va.)); Chere v. Taye, 2:04-cv-06264 (D.N.J.).

<sup>21</sup> Balite v. Bishman, 6:11-cv-6252 (D.Or.); Chere v. Taye, 2:04-cv-06264 (D.N.J.); Lama v. Malik, 2:13-cv-02846 (E.D.N.Y.).

<sup>22</sup> See Abafita v. Aldukhan, 1:16-cv-06072 (S.D.N.Y.); Ara v. Khan, 1:07-cv-1251 (E.D.N.Y.); Avila v. Espinel, 1:19-cv-08385 (N.D.Ill.); Barjo v. Cherian, 8:18-cv-01587 (D.Md.); Bergado v. Velonza, 2:17-cv-09070 (C.D.Cal.); Bibi v. Shakil-v. Ur-Rahman et al, 1:20-cv-10478 (E.D.Va.); Blanco v. Perdomo, 1:13-cv-20374 (S.D.Fla.); Brojer v. Kuriakose, 2:11-cv-03156 (E.D.N.Y.); C.G.B. v. Santa Lucia, 2:15-cv-03401 (D.N.J.); Carazani v. Zegarra, 1:12-cv-00107 (D.D.C.); Chere v. Taye, 2:04-cv-06264 (D.N.J.); Cruz v. Maypa, 1:13-cv-00862 (E.D.Va.); Doe v. Amal, 1:12-cv-01359 (E.D.Va.); Doe v. Howard, 1:11-cv-01105 (E.D.Va.); Doe v. Khobragade, 1:18-cv-11134 (S.D.N.Y.); Doe v. Siddig, 1:10-cv-01256 (D.D.C.); Doe v. Zinsou, 1:19-cv-07025 (S.D.N.Y.); Dumapias v. Haybyrne, 1:20-cv-00297 (E.D.Va.); Elat v. Ngoubene, 8:11-cv-2931 (D.Md.); Garnica v. Edwards, 1:13-cv-3943 (S.D.N.Y.); Guobadia v. Irowa, 2:12-cv-4042 (E.D.N.Y.); Hernandez v. Attisha, 3:09-cv-02257 (S.D.Cal.); Jose v. Joshua et al, 2:19-cv-04583 (E.D.N.Y.); Josenia Ferreyra Santos v. Villalona et al., 1:20-cv-05253 (S.D.N.Y.); Kiwanuka v. Bakilana, 1:10-cv-01336 (D.D.C.); Laamime v. Abouzaid, 1:13-cv-00793 (E.D.Va.); Lagasan v. Al-Ghasel, 1:14-cv-01035 (E.D.Va.); Leo v. Al Naser, 1:08-cv-01263 (D.D.C.); Lipenga v. Kambalame, 8:14-cv-03980

(D.Md.); *Martinez v. Calimlim*, 2:08-cv-00810 (E.D.Wis.); *Masangcay v.;* *Kamenetskaya*, 1:18-cv-03666 (E.D.N.Y.); *Mathai v. George*, 1:13-cv-00997 (N.D.N.Y.); *Maysaroh v. American Arab Communications, LLC*, 1:13-cv-01743 (D.D.C.) (later 1:14-cv-00866 (E.D.Va.)); *Mazengo v. Mzengi*, 1:07-cv-00756 (D.D.C.); *Mbome v. Njie*, 4:18-cv-00597 (N.D.Tex.); *Meda v. Kogda*, 1:17-cv-06853 (S.D.N.Y.); *Mistry v. Udwadia*, 5:12-cv-00034 (W.D.Ok.); *Moulouki v. Epee*, 1:14-cv-05532 (N.D.Ill.); *Mugambiwa v. Chiweshe*, 1:17-cv-02541 (D.Md.); *Munoz v. Rossi*, 1:13-cv-00884 (D.D.C.); *Oh v. Choi*, 1:11-cv-03764 (E.D.N.Y.); *Paucar v. Marquez*, 13-cv-24067 (S.D.Fla.); *Ramos v. Hoyle*, 1:08-cv-21809 (S.D.Fla.); *Rios Fun v. Pulgar*, 2:13-cv-03679 (D.N.J.); *Roncesvalles v. Gulec*, 0:19-cv-60495 (S.D.Fla.); *Sabbithi v. Al Saleh*, 1:07-cv-115 (D.D.C.); *Salgado v. Gunawardane*, 2:04-cv-7378 (C.D.Cal.); *Samirah v. Sabhnani*, 2:08-cv-2970 (E.D.N.Y.); *Sulaiman v. Laram*, 1:16-cv-08182 (S.D.N.Y.); *Sulastri v. Halsey*, 2:12-cv-3538 (E.D.N.Y.); *Tekle v. Al Saud*, 1:18-cv-00211 (E.D.Va.); *Woods v. Armand*, 1:17-cv-02550 (E.D.N.Y.).

<sup>23</sup> See *US v. Ac-Salazar (Santos) et al*, 1:20-cr-00700 (N.D.Ill.); *US v. Bello (Bidemi)*, 1:10-cr-00397 (N.D.Ga.); *US v. Cros-Toure (Denise) et al*, 4:18-cr-00230 (N.D.Tex.); *US v. Hunaity (Alia)*, 1:18-cr-00723 (D.N.J.); *US v. Kenit (Edk) et al*, 3:11-cr-05182 (W.D.Wash.); *US v. Mondragon (Angel) et al*, 2:15-cr-00386 (W.D.Wash.); *US v. Paz-Rodriguez (Ronald) et al*, 4:20-cr-00082 (N.D.Okla.); *US v. Sihombing (Elina) et al*, 2:11-cr-02237 (D.N.M.); *US v. Soe (Yan) et al*, 1:09-cr-00031 (W.D.N.Y.).

<sup>24</sup> Report and Recommendation at 4, *Mazengo v. Mzengi*, No. 1:07-cv-00756 (D.D.C. Dec. 20, 2007).

<sup>25</sup> *Id.* at 5-6.

<sup>26</sup> *Id.* at 6.

<sup>27</sup> Transcript of Sentencing Hearing at 22-24, *US v. Homoud*, No. 15-cr-00391 (W.D. Tex. Feb. 9, 2016).

<sup>28</sup> *Lagasan v. Al-Ghasel*, 1:14-cv-01035 (E.D.Va.).

<sup>29</sup> See *Chigangu v. NDusha*, 5:14-cv-00062 (E.D.Ky.); *Doe v. Siddig*, 1:10-cv-01256 (D.D.C.); *Elat v. Ngoubene*, 8:11-cv-2931 (D.Md.); *Guobadia v. Irowa*, 2:12-cv-4042 (E.D.N.Y.); *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C.); *Lipenga v. Kambalame*, 8:14-cv-03980 (D.Md.); *Mistry v. Udwadia*, 5:12-cv-00034 (W.D.Ok.); *Mugambiwa v. Chiweshe*, 1:17-cv-02541 (D.Md.); *Ouedraogo v. Bonkougou*, 1:15-cv-01345 (S.D.N.Y.); *Velez v. Sanchez*, 1:04-cv-04797 (E.D.N.Y.); *Woods v. Armand*, 1:17-cv-02550 (E.D.N.Y.).

<sup>30</sup> See *US v. Ac-Salazar (Santos) et al*, 1:20-cr-00700 (N.D.Ill.); *US v. Bello (Bidemi)*, 1:10-cr-00397 (N.D.Ga.); *US v. Cros-Toure (Denise) et al*, 4:18-cr-00230 (N.D.Tex.); *US v. Hunaity (Alia)*, 1:18-cr-00723 (D.N.J.); *US v. Kenit (Edk) et al*, 3:11-cr-05182 (W.D.Wash.); *US v. Mondragon (Angel) et al*, 2:15-cr-00386 (W.D.Wash.); *US v. Paz-Rodriguez (Ronald) et al*, 4:20-cr-00082 (N.D.Okla.); *US v. Sihombing (Elina) et al*, 2:11-cr-02237 (D.N.M.); *US v. Soe (Yan) et al*, 1:09-cr-00031 (W.D.N.Y.).

<sup>31</sup> *Chigangu v. NDusha*, 5:14-cv-00062 (E.D.Ky.).

<sup>32</sup> *Mugambiwa v. Chiweshe*, 1:17-cv-02541 (D.Md.).

<sup>33</sup> *Doe v. Siddig*, 1:10-cv-01256 (D.D.C.); *Guobadia v. Irowa*, 2:12-cv-4042 (E.D.N.Y.); *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C.); *Lipenga v. Kambalame*, 8:14-cv-03980 (D.Md.); *Ouedraogo v. Bonkougou*, 1:15-cv-01345 (S.D.N.Y.); *Mistry v. Udwadia*, 5:12-cv-00034 (W.D.Ok.); *Velez v. Sanchez*, 1:04-cv-04797 (E.D.N.Y.); *Woods v. Armand*, 1:17-cv-02550 (E.D.N.Y.).

<sup>34</sup> 773 F.3d 138 (4th Cir. 2014)

<sup>35</sup> *Id.* at 145-46.

<sup>36</sup> See *Abafita v. Aldukhan*, 1:16-cv-06072 (S.D.N.Y.); *Arma v. Prakoso*, 8:14-cv-03113 (D.Md.); *Bibi v. Shakil-v. Ur-Rahman et al*, 1:20-cv-10478 (E.D.Va.); *Bonilla v. Buch*, 1:18-cv-02092 (D.Colo.); *Butigan v. Al-Malki*, 1:13-cv-00514 (E.D.Va.); *Chere v. Taye*, 2:04-cv-06264 (D.N.J.); *Chigangu v. NDusha*, 5:14-cv-00062 (E.D.Ky.); *Cruz v. Toliver*, 5:04-cv-231 (W.D.Ky.); *Doe v. Amal*, 1:12-cv-01359 (E.D.Va.); *Doe v. Howard*, 1:11-cv-01105 (E.D.Va.); *Doe v. Pletin*, 2:18-cv-06974 (E.D.N.Y.); *Doe v. Siddig*, 1:10-cv-01256 (D.D.C.); *Dumapias v. Haybyrne*, 1:20-cv-00297 (E.D.Va.); *Elat v. Ngoubene*, 8:11-cv-2931 (D.Md.); *Franco v. Diaz*, 1:14-cv-1909 (E.D.N.Y.); *Hara v. Mak*, 2:13-cv-02924 (E.D.N.Y.); *Josenia Ferreyra Santos v. Villalona et al.*, 1:20-cv-05253 (S.D.N.Y.); *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C.); *Kunamwene v. Mwoombola et al*, 1:19-cv-01957 (D.D.C.); *Lagayan v. Odeh*, 1:15-cv-01953 (D.D.C.); *Lipenga v. Kambalame*, 8:14-cv-03980 (D.Md.); *Mathai v. George*, 1:13-cv-00997 (N.D.N.Y.); *Moulouki v. Epee*, 1:14-cv-05532 (N.D.Ill.); *Nassali v. Kamyia*, 8:19-cv-02444 (D.Md.); *Oluoch v. Orina*, 1:14-cv-421 (S.D.N.Y.) (prev: 11-cv-3117 (S.D.N.Y.)); *Rios Fun v. Pulgar*, 2:13-cv-03679 (D.N.J.); *Roe v. Howard*, 1:16-cv-00562 (E.D.Va.); *Sabbithi v. Al Saleh*, 1:07-cv-115 (D.D.C.); *Sulaiman v. Laram*, 1:16-cv-08182 (S.D.N.Y.); *Velez v. Sanchez*, 1:04-cv-04797 (E.D.N.Y.).

<sup>37</sup> See *US v. Edwards (Alfred) et al*, 8:11-cr-00316 (D.Md.); *US v. Kenit (Edk) et al*, 3:11-cr-05182 (W.D.Wash.); *US v. Nsobundu (Chudy) et al*, 4:16-cr-00089 (S.D.Tex.); *US v. Penzato (Giuseppe) et al*, 3:12-cr-00089 (N.D.Cal.); *US v. Sihombing (Elina) et al*, 2:11-cr-02237 (D.N.M.).

<sup>38</sup> Complaint at 17, *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C. Aug. 9, 2010).

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<sup>39</sup> *Id.* at 4–5.

<sup>40</sup> See Restitution Judgment, *US v. Bakilana*, 1:10-cr-00093 (E.D.Va. July 2, 2010). See Judgment, *US v. Bakilana*, 1:10-cr-00093 (E.D.Va. July 2, 2010).

<sup>41</sup> Complaint at 17, *Kiwanuka v. Bakilana*, 1:10-cv-01336 (D.D.C. Aug. 9, 2010).

<sup>42</sup> See U.S. Dep't of Justice, *Justice Department Recognizes the 10th Annual Human Trafficking Prevention Month* (Jan. 29, 2021), <https://www.justice.gov/opa/pr/justice-department-recognizes-10th-annual-human-trafficking-prevention-month>.