

United States Federal Courts' Continuing Failure to Order Mandatory Criminal Restitution for Human Trafficking Victims



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This report was written by Alexandra F. Levy, senior staff attorney at the Human Trafficking Legal Center, and edited by Martina E. Vandenberg, president of the Human Trafficking Legal Center. WilmerHale partners Bill McLucas and Leonard Pierce edited the report and led a team of WilmerHale lawyers in conducting extensive research on federal criminal cases.

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I. EXECUTIVE SUMMARY

Criminal restitution achieves two goals: first, it fosters the criminal justice aims of deterrence, rehabilitation and accountability. Second, restitution also serves the remedial purpose of making crime victims whole by reimbursing them for financial harm caused by crime. **Under federal law, criminal restitution for trafficking victims is mandatory.**¹ The Trafficking Victims Protection Act requires that federal courts order restitution in trafficking cases in the “full amount of the victim’s losses.”² This includes out-of-pocket expenses and the value to the defendant of the victim’s services, regardless of their legality.³

The mandatory restitution law is currently observed in the breach. Federal courts rarely order restitution to trafficking victims. And, even when restitution is ordered, trafficking victims rarely receive these funds. This persistent chasm between the law as written and as applied raises three critical questions. First, why do courts fail to order mandatory restitution for trafficking victims? Second, what can be done to remedy this failure? And third, how can collection efforts be improved?

This report, based on an analysis of federal prosecutions over a seven-year period, addresses these three questions.

In 2014, the Human Trafficking Pro Bono Legal Center (now the Human Trafficking Legal Center) and the law firm WilmerHale jointly published a report, entitled “When ‘Mandatory’ Does Not Mean Mandatory: Failure to Obtain Criminal Restitution in Federal Prosecution of Human Trafficking in the United States,” in which the authors examined federal restitution data in human trafficking cases brought between 2009 and 2012.⁴ The analysis demonstrated that despite the clear black letter law, courts awarded mandatory restitution to trafficking victims in just 36% of cases.⁵ The research found a strong correlation between the federal prosecutor’s approach to restitution and the likelihood that the court would order it.⁶ Predictably, a judge was more likely to order restitution when the prosecutor pursued it aggressively.⁷ When prosecutors requested restitution, courts ordered restitution in 51% of cases.⁸ Yet prosecutors requested restitution in only 63% of cases analyzed in the original data set.⁹

Data collected and analyzed since the publication of the initial findings provided a disheartening portrait of a continuing failure on the part of United States federal courts to order criminal restitution to trafficking victims. **The updated data indicated that the percentage of trafficking cases ending with a mandatory criminal restitution order dropped from 36% in the prior period to just 27% in the current research date range.**¹⁰

Not all the news was bad. Since the publication of the 2014 Mandatory Restitution Report, the number of federal jurisdictions with at least one restitution order in a human trafficking case jumped from 28 to 41.¹¹ And federal prosecutors also requested restitution more often: the updated data registered an uptick in prosecutorial requests from 63% to 67%.¹²

Nevertheless, the updated data set also demonstrated that prosecutors' requests for restitution enjoyed far less success before federal judges. The percentage of cases with restitution requests that ended with restitution orders dropped from 51% in the 2014 data set to just 37% in the new time period.¹³

This trend should raise an alarm: while the frequency of restitution *requests* increased slightly from 2014 to 2016, the frequency of restitution *orders* decreased significantly. This report analyzes these two opposing trends: on the one hand, prosecutors stepped up to the plate by requesting restitution more frequently, while on the other, courts granted a lower percentage of restitution requests. The overall result: an even smaller percentage of trafficking victims obtained restitution orders.¹⁴

The law is clear, but something is going very wrong. In the overwhelming majority of cases, courts are denying trafficking victims the compensation to which they are, by statute, entitled.

What should be done? The data analysis presented in this paper points to a number of strategies that might better protect the rights of trafficking victims to obtain restitution. The recommendations set forth below include the following:

1. Continue to educate prosecutors that restitution is mandatory in human trafficking cases and provide resources to assist them in presenting their arguments in court;
2. Ensure that federal judges hearing trafficking cases have training on mandatory restitution in human trafficking cases; and
3. Provide trafficking victims with victim-witness counsel to advocate for restitution and other victims' rights issues before federal courts.

Mandatory restitution is the law. Ultimately, it is federal judges who must enforce the law. But advocates, including prosecutors, can play a role in ensuring that restitution orders become the rule, not the exception.

II. METHODOLOGY AND DATA ANALYSIS

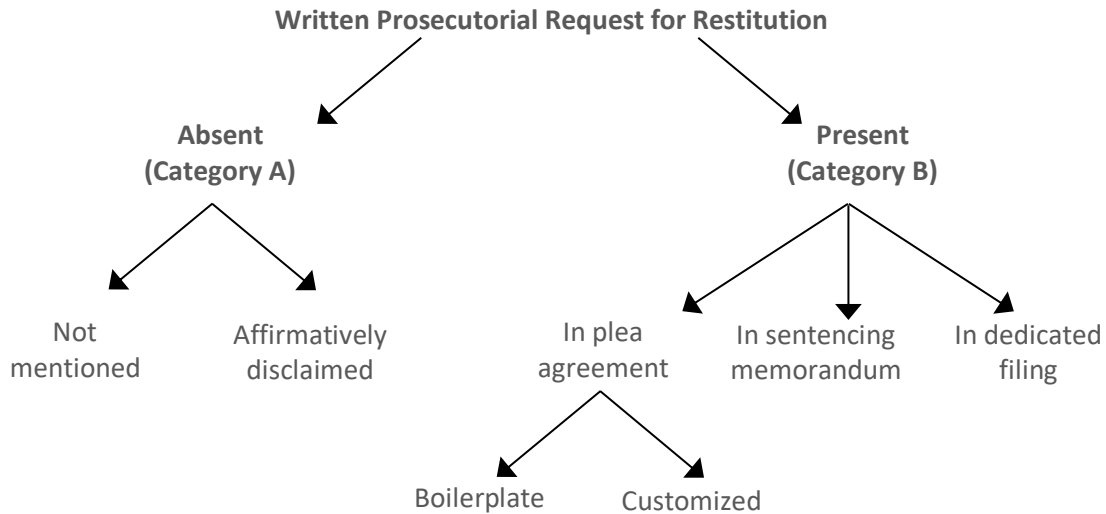
Researchers identified 420 federal human trafficking cases prosecuted under the federal trafficking laws, codified in Chapter 77 of Title 18, filed after December 31, 2012 and closed on or before June 4, 2016.¹⁵ In addition, researchers included all cases filed between January 1, 2009 and December 31, 2012 that had not closed by February 2, 2014 (the closing date of the 2014 Mandatory Restitution Report). This data set included only cases in which at least one defendant

faced charges under Chapter 77 of Title 18. As in the 2014 Mandatory Restitution Report, researchers excluded cases in which restitution was not applicable (i.e., cases that were dismissed or ended in acquittal), and cases with no trafficking victims (i.e., sting operations).¹⁶ Researchers also eliminated cases in which there was insufficient documentation available to warrant a reasonable conclusion that no request had been made. In total, researchers removed 96 cases from the data set, leaving 324 cases that met the following criteria:

1. At least one Chapter 77 charge was brought against at least one defendant;
2. The case post-dated the timeframe in the previous report, and was resolved on or before June 4, 2016;
3. At least one defendant pled guilty or was convicted at trial;
4. The allegations involved trafficking victims; and
5. Available case documents included a request for restitution, or sufficient documentation was available to warrant a reasonable conclusion that no such request had been made.¹⁷

Researchers divided these 324 cases into two categories. Category A encompassed cases in which prosecutors *did not* request restitution. Category B included cases in which prosecutors *did* request restitution.¹⁸ As shown in Figure 1 below, researchers classified Category A cases according to whether the prosecutor had *affirmatively disclaimed* restitution, or whether there was simply no request found on the case docket. They classified Category B cases according to the procedural posture and form of the request – namely, whether the request appeared in a plea agreement using boilerplate language, in a plea agreement using particularized language, in a government sentencing memorandum, or in a separate dedicated filing addressing restitution.¹⁹

FIGURE 1: Case Classifications



Researchers also sorted cases by jurisdiction, by amount of restitution awarded to victims, and by case outcome. Because the mandatory restitution provision of the Trafficking Victims Protection Act (TVPA), 18 U.S.C. §1593, applies only to Chapter 77 crimes, researchers tracked the specific crime to which the defendant pled guilty in cases that ended in plea agreements. Finally, researchers analyzed cases with reference to the type of human trafficking involved: labor or sex.

III. RESEARCH FINDINGS

A. Restitution Requests as a Factor in Restitution Outcomes

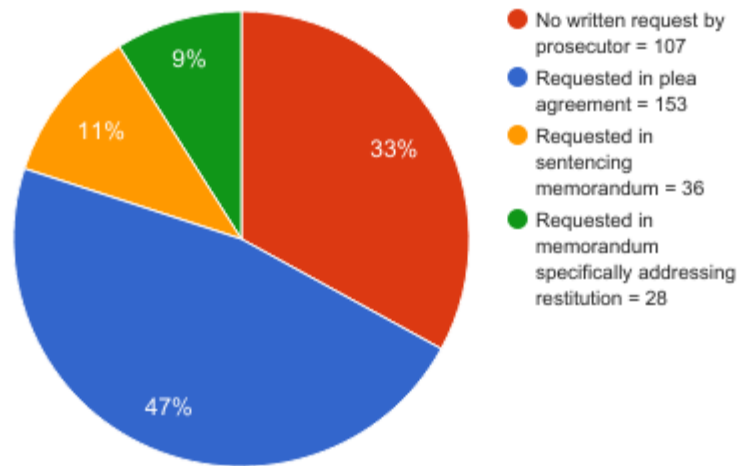
1. No Request or Affirmative Refusal to Request Restitution – Category A

Of the 324 cases that met the threshold criteria for inclusion in the data set, there was no known request for restitution from a prosecutor in 107 cases. In 41 of the cases in which prosecutors did not request restitution, the prosecutors explicitly *declined to request* restitution; in the remaining 66 cases, the available documents simply had no mention of restitution.

2. Restitution Requested by Prosecutors – Category B

Of the 324 cases that met the threshold criteria for inclusion in the data set, prosecutors affirmatively requested restitution in 217 cases. Prosecutors who requested restitution did so in a variety of ways: 129 cases included boilerplate restitution requests in the plea agreements; 24 included specific restitution requests in the plea agreements; 36 included restitution requests in sentencing memoranda; and 28 included requests in separate filings focused on the issue of restitution.

FIGURE 2: Percentage of Cases in Which Restitution Requests Were Made, and in What Manner



Consistent with the findings of the 2014 Mandatory Restitution Report, the updated data demonstrated a high correlation between request methods and restitution outcomes. Restitution was ordered in only 8 out of 107 cases (7%) in which the prosecutor simply failed to request it. It was not ordered in any of the 41 cases in which the prosecutor expressly disavowed restitution. When the prosecutor failed to seek the appropriate relief, the victim was less likely to get restitution.

On the other end of the spectrum, courts ordered restitution in 24 out of the 28 cases (86%) in which the prosecutor requested the relief in a memorandum specifically dedicated to the issue. When the government requested restitution in a sentencing memorandum or another written submission (even one not entirely dedicated to addressing restitution), courts issued restitution orders in 27 out of 36 cases (75%). In contrast, a request contained in a plea agreement yielded an order in only 30 out of 153 cases (20%).

FIGURE 3: Number of Cases in Which Prosecutors Requested Restitution, and in What Manner

	No restitution request by prosecutor	Requested in plea agreement	Requested in sentencing memorandum	Requested in a memorandum specifically addressing restitution	Total
Restitution ordered	9	30	27	24	89
No restitution ordered	99	123	9	4	235
Total	107	153	36	28	324

B. Disposition of Criminal Prosecution as a Factor in Restitution Outcomes

Of the 324 cases examined, 280 included at least one defendant who pled guilty. Most of those defendants pled guilty to human trafficking: 185 (66%) of cases ended in guilty pleas to Chapter 77 human trafficking crimes²⁰; 90 (32%) included pleas to trafficking-related crimes; and 5 (2%) included pleas to unrelated crimes only. Although not all pled-to offenses included mandatory restitution provisions, prosecutors clearly have the authority to negotiate restitution in plea agreements under any provision.²¹

FIGURE 4: Number of Cases in Which Prosecutors Requested Restitution and the Frequency of Restitution Orders

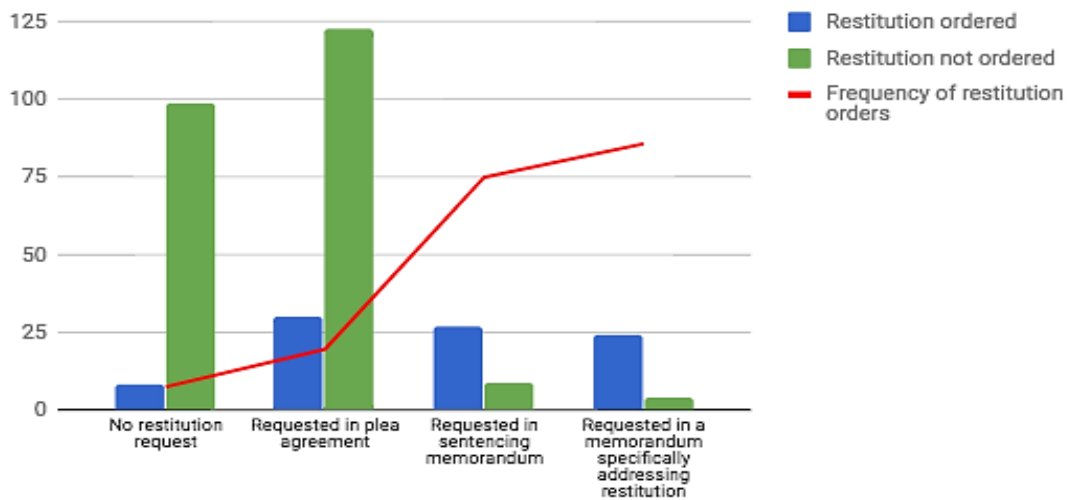
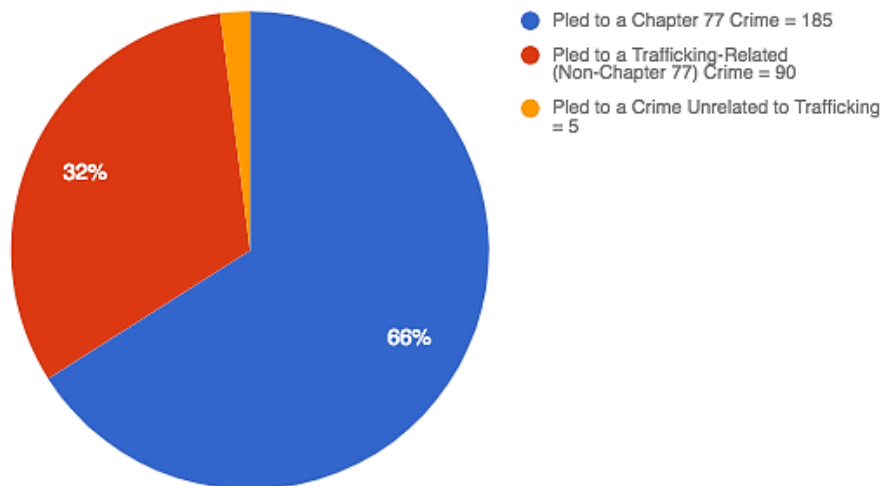


FIGURE 5: Plea Agreements by Offense

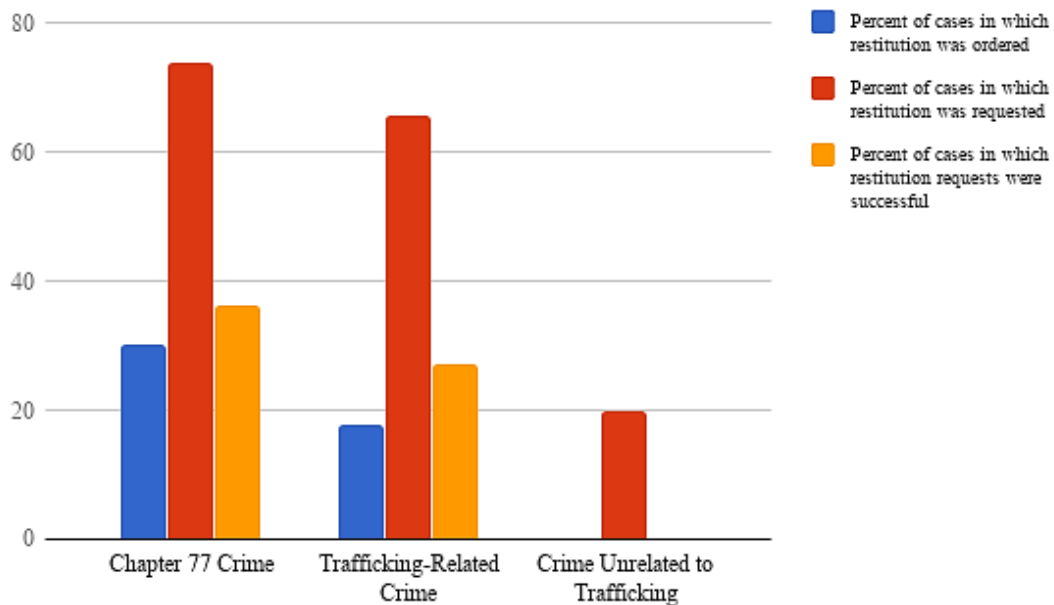


When cases were resolved through plea agreements, prosecutors were more likely to request restitution when defendants pled to Chapter 77 violations. In 137 out of the 185 cases (74%) in which defendants pled to Chapter 77 violations, federal prosecutors requested restitution. However, prosecutors did so in only 58 out of 90 cases (64%) in which defendants pled to other trafficking-related crimes, such as violations of the Mann Act. Prosecutors requested restitution in just 1 out of the 5 cases (20%) in which defendants pled guilty to unrelated crimes.

FIGURE 6: Restitution Requests and Type of Offense in Plea Agreement

	Pled to Chapter 77 Offense	Pled to Trafficking-Related Offense	Pled to Offense Unrelated to Trafficking	Total
Restitution requested	137	58	1	196
No restitution requested	48	32	4	84
Total	185	90	5	280

FIGURE 7: Restitution Requests and Outcomes by Type of Plea



C. Type of Trafficking Case as a Factor in Restitution Outcomes

The government rarely prosecutes labor trafficking cases under federal trafficking laws. Of the 324 cases evaluated in this report, only 8 (3%) involved defendants charged with forced labor or labor trafficking violations. The 2014 Mandatory Restitution Report had a roughly ten-to-one ratio of trafficking cases for sex compared to those for labor; the current ratio is nearly forty-to-one. Because the number of labor cases is so minute, it is difficult to draw meaningful conclusions from the data.²²

Of the 8 forced labor cases identified, 4 (50%) included restitution requests, and 4 (50%) included restitution awards. Of the 316 sex trafficking cases, 213 (67%) included restitution requests, and 85 (27%) included restitution awards. While the limited number of labor cases forecloses any broad conclusions, the discrepancy between the success rates of restitution requests in labor cases (100%) and sex trafficking cases (36%) is notable.

FIGURE 8: Restitution Requests and Orders in Labor and Sex Trafficking Cases

	Restitution requested	Restitution not requested	Restitution ordered	Restitution not ordered
Labor Trafficking (8)	4	4	4	4
Sex Trafficking (316)	213	103	85	231

Consistent with the findings of the 2014 Mandatory Restitution Report, the type of trafficking was also correlated with wide discrepancies in the amount of restitution that courts ordered. The updated data set indicated that the overall average restitution order was \$59,244.25. But that average masked a significant chasm in amounts ordered to labor versus sex trafficking victims. The new data revealed that on average, sex trafficking defendants were ordered to pay restitution in the amount of \$47,968.21. In contrast, the average restitution order in labor trafficking cases was \$504,647.82.

FIGURE 9: Restitution Requests by Case Type

FIGURE 9-A: Labor Trafficking Restitution Requests

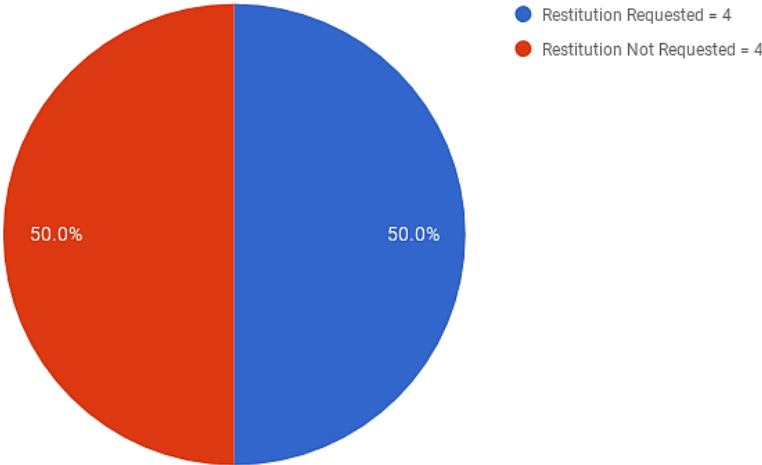


FIGURE 9-B: Sex Trafficking Restitution Requests

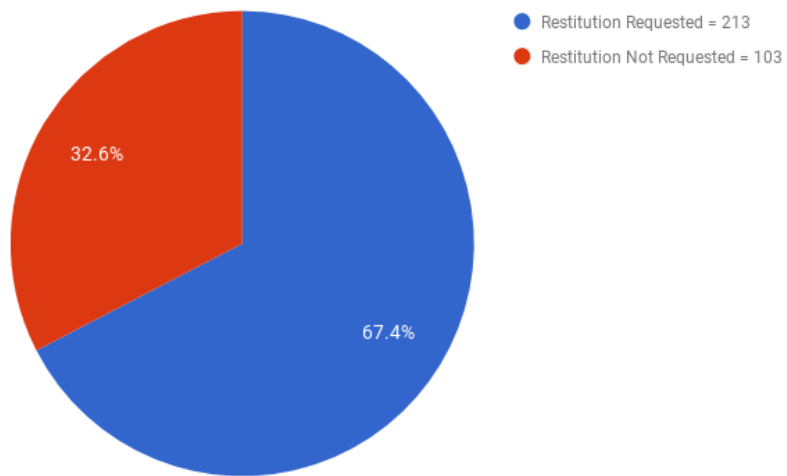


FIGURE 9-C: Sex Trafficking and Labor Trafficking Restitution Requests Combined

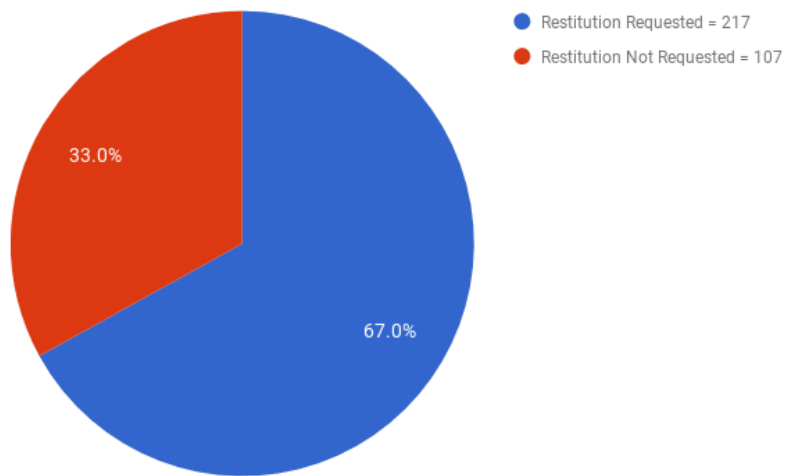


FIGURE 10: Restitution Orders by Case Type

FIGURE 10-A: Labor Trafficking Restitution Orders

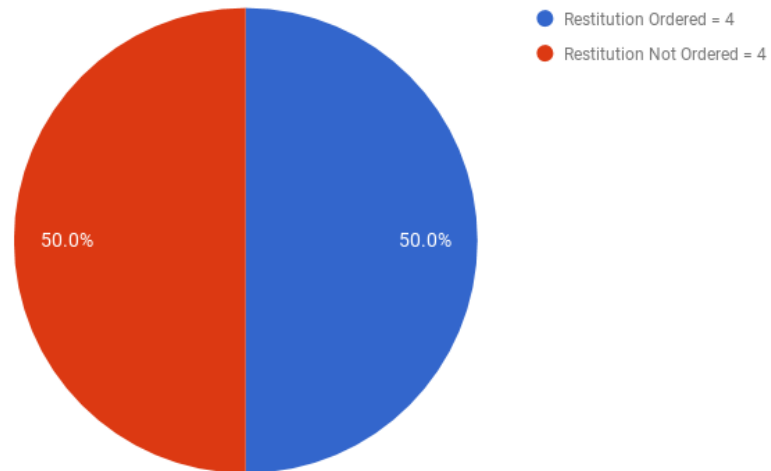


FIGURE 10-B: Sex Trafficking Restitution Orders

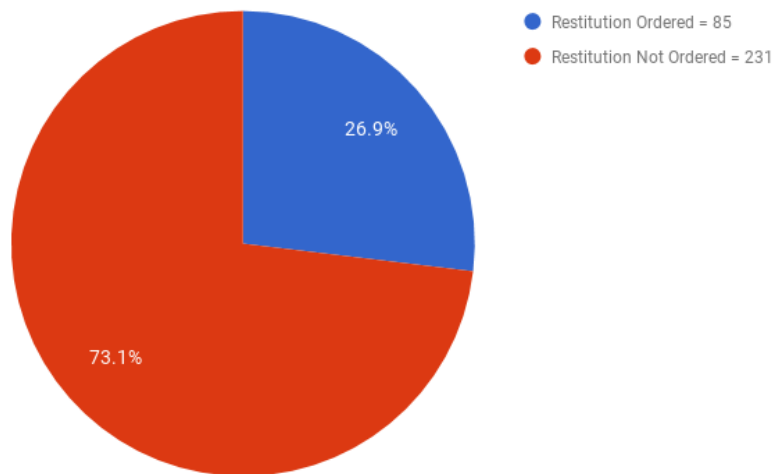


FIGURE 10-C: Sex Trafficking and Labor Trafficking Restitution Orders Combined

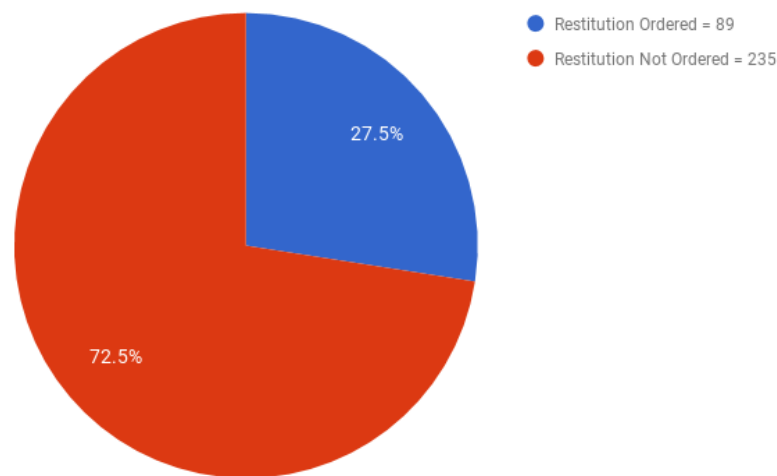


FIGURE 11: Proportion of Successful Restitution Requests by Case Type

FIGURE 11-A: Labor Trafficking Restitution Request Success Rate

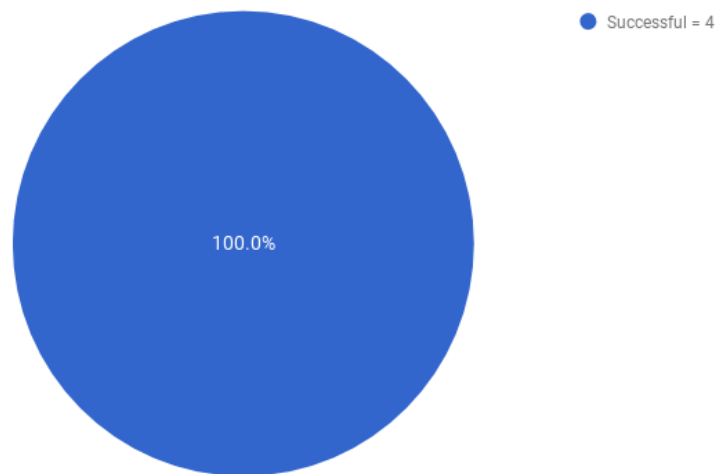


FIGURE 11-B: Sex Trafficking Restitution Request Success Rate

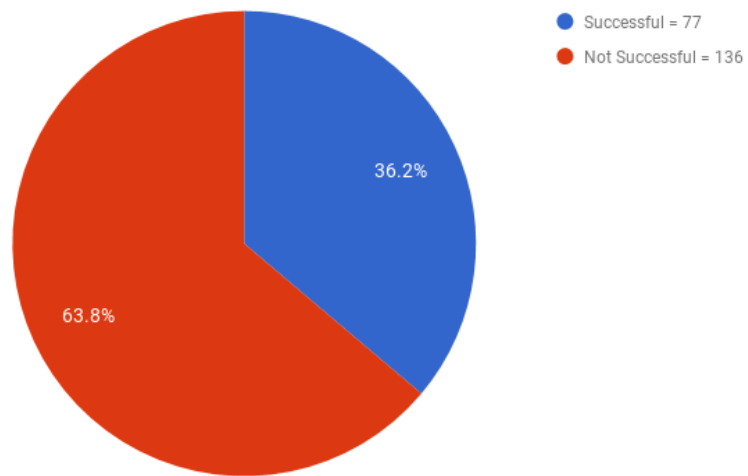
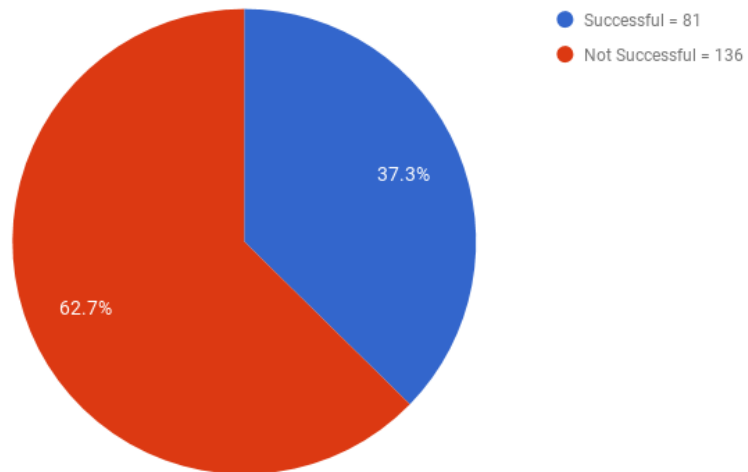


FIGURE 11-C: Sex Trafficking and Labor Trafficking Request Success Rate Combined



D. Analysis: Why Do Courts Fail to Order Mandatory Restitution for Trafficking Victims?

1. The Role of Federal Judges

Restitution in federal human trafficking cases is *mandatory*. It is irrelevant whether the victim seeks it, whether the prosecutor requests it, or whether the defendant is likely to have the means on hand to pay it.²³ Restitution is simply a required part of the sentence in all cases where there is evidence that a victim has suffered a loss.

Federal judges frequently order long prison sentences in trafficking cases.²⁴ Yet sentencing transcripts reveal that many federal judges remain unaware of the fact that restitution is a requirement. Still other judges, even after hearing arguments from federal prosecutors that restitution must be ordered, decline to enter the orders. Their reasons for refusing to do so, as best can be discerned from the records in these cases, run the gamut:

- The request was made too late in the case;
- The request was not in writing;
- The defendant did not have the means to pay restitution;
- The work for which the victim would be compensated was illegal;
- The court wished to close the case; and
- The trafficking victim worked abroad, giving rise to questions of extraterritorial jurisdiction.

In some jurisdictions, the U.S. Attorney's Office requested restitution in every trafficking case it prosecuted, only to be denied by the court on every occasion. The following chart sets forth a list of U.S. Attorneys' Offices with perfect records of requesting restitution in human trafficking cases during the reporting period, juxtaposed with the courts' record of ordering restitution. These are jurisdictions in which the prosecutors took all the correct steps to follow the federal law on criminal restitution. It is unclear why the courts in these jurisdictions issued blanket denials.

Jurisdiction	# of Requests (= # of cases)	# of Orders
D. Maryland	7	0
D. Nevada	6	0
D. South Dakota	4	0
E.D. Tennessee	1	0
M.D. North Carolina	2	0
S.D. Illinois	1	0
S.D. Iowa	2	0
W.D. Arkansas	3	0
W.D. Louisiana	2	0
Total	28	0

Sixty-four cases in the updated data set each included either a separate restitution request or a request in a sentencing memorandum. Courts ordered restitution in 51 of those cases. Courts did *not* order restitution in the remaining 13 cases, notwithstanding the prosecutors' specific requests, and despite the mandatory nature of restitution.²⁵ In nine of those cases, the court's reasoning cannot be discerned from the available documents or from sentencing transcripts. Of the remaining four cases, one court refused to award restitution because of a procedural error on the part of the prosecutors, and one held that the restitution, as calculated by the victim, lacked a sufficient nexus to the defendant. In the last two cases, the courts simply refused to apply the black-letter law on restitution.

Cases Illustrating Challenges to Obtaining Restitution Orders

A few cases illustrate some of the challenges that prosecutors have faced in obtaining restitution orders in federal human trafficking cases.

Example 1: Criminalized Work

In *United States v. Carson*, the defendant trafficked four minor victims for a period of several months in 2010.²⁶ McKenzie Carson used violence to maintain control over his victims. For example, in retaliation for an attempted escape, he tried to run one victim over with his car.²⁷ A jury convicted Carson.²⁸ In the government's sentencing memorandum, prosecutors noted the requirement under 18 U.S.C. §1593 that the defendant pay restitution to the victim.²⁹ The prosecutor offered to provide the court with a chart detailing the victims' earnings, "based upon the number of days that they worked and an average amount that they made each day," at the sentencing hearing.³⁰ These estimates, she noted, were based on "testimony that was given under oath and the jury found ... credible."³¹

The court expressed skepticism that restitution could be awarded for work that would be illegal if it had been performed voluntarily.³² The prosecutor responded, correctly, that the illegal nature

of the work had no bearing on the restitution requirement.³³ Confronted with this argument, the court suddenly announced that the government's request was untimely – despite the fact that the government had requested restitution well in advance of the hearing, and was now providing a detailed breakdown of the calculations.³⁴ Ultimately, the judge admitted that she simply did not want to deal with the issue:

I guess, without anything being submitted, I didn't have any reason to really look into it. Okay. I don't think there is going to be any money, so I think we're spending additional time in a too warm courtroom for something that isn't going to be very useful. But I'm not going to order restitution based on something that I was just given now. And this is the end of the case.³⁵

In another case, *United States v. Gemma*, the prosecutor requested restitution in the amount of \$5,600.³⁶ This amount was based on “an abundance of testimony at trial, all consistent with the victim's [ads] and the Backpage[] ads, that the defendant charged \$100 for half an hour and \$200 for an hour to prostitute in this case, that she performed sex acts on numerous occasions daily throughout a two-week period.”³⁷

The judge acknowledged “the math,” but mused that “to sort of say the money should have been hers rather than his is a little bit odd in this context.”³⁸ When the prosecutor properly pointed to case citations supporting the proposition that victims trafficked into illegal labor are still entitled to restitution, the judge reminded her that “[s]ometimes people have different views,” and ended the discussion.³⁹ Ultimately, the judge's “reasoning” came down to his final statement on the subject: “Well, yeah. Okay. I think not.”⁴⁰

Example 2: Refusal to Order Restitution After Sentencing

In *United States v. Michael Lee*, the defendant pled guilty to sex trafficking under 18 U.S.C. §1591 (along with one other count).⁴¹ The government did not originally file a separate restitution request, although prosecutors asked for restitution using boilerplate language in the plea agreement.⁴² The court sentenced Lee to 156 months in prison, but did not order restitution.⁴³ Nine days after the judgment issued, the government filed a motion to amend the order in order to address the restitution issue.⁴⁴ The government argued that the court had committed a “clear error” by not ordering restitution, and, under Rule 35, the court could therefore amend its judgment.⁴⁵ Along with its motion to amend, the government filed a victim impact statement, in which “Victim S” detailed the personal and financial losses she had suffered as a result of the crime.⁴⁶

The government's motion stated that the information provided by Victim S had not been available prior to sentencing, and cited 18 U.S.C. §3664(d)(5) for the proposition that the government could therefore seek amendment of the order.⁴⁷ However, the defense successfully argued that the government had access to all the necessary information earlier.⁴⁸ The defense further claimed

that 18 U.S.C. §3664(d)(5) was limited to cases in which the defendant had been put on notice of the possibility that restitution would be ordered at a later time.⁴⁹

In a one-page order, the court ruled that Rule 35 did not permit an amendment to the judgment.⁵⁰ The court stated: “it hardly constitutes ‘clear error’ for the court not to impose restitution when no request for the payment of restitution is made at the time of sentencing.”⁵¹ The victim received no restitution.⁵²

Example 3: Skepticism about Restitution Calculations

Restitution need not be determined “with mathematical precision,” but need only be a reflection of the victim’s losses.⁵³

Some courts have expressed skepticism about victims’ estimates of the expenses associated with their trafficking, and have, as a result, declined to order restitution. In *United States v. Larry Thomas*, the prosecutor requested restitution on behalf of the victim, deferring to the victim’s own calculations.⁵⁴ The victim, who appeared telephonically, said that she was owed money for (among other things) gas, rent, and food.⁵⁵ The prosecutor, as an officer of the court, could not support that these were legally permissible costs.⁵⁶ The court declined to grant the award.⁵⁷

The sentencing transcript strongly suggests that prosecutors submitted only the victim’s calculations, requesting neither the defendant’s earnings under 18 U.S.C. §1593 nor the victim’s full losses under 18 U.S.C. §2259.⁵⁸ This deference to the victim’s calculations resulted in the court finding “an insufficient nexus between the crime charged and the request for restitution.”⁵⁹ While the prosecutor did *request* restitution, more engagement in the underlying calculations might have resulted in an order. Pro bono legal counsel for the victim might also have assisted in the calculations.

Judicial skepticism does not always completely destroy a victim’s chances of getting restitution, but may decrease the amount of the award. In *United States v. Carl Brandon Smith*, for example, the defendant trafficked four minor victims.⁶⁰ He brutalized his victims, beating one victim so severely her eye swelled shut.⁶¹ He punched another with such force that her braces tore.⁶² In the government’s sentencing memorandum, prosecutors requested restitution for each victim based on individualized calculations of their earnings, estimated by multiplying the number of forced sex acts by the amount charged for each.⁶³ After discussing the government’s rationale at the defendant’s sentencing hearing, the judge ordered the amounts requested, less 25%, “crediting, in large part, what the victims have reported, but acknowledging, given the time that has passed and the circumstances that this conduct occurred under, that it might be overestimated a little bit.”⁶⁴ The court ordered \$239,063 in restitution.⁶⁵

Example 4: Fines without Restitution

In *United States v. Barclay*, a sex trafficking case brought in the Western District of Texas, the record appears to be completely silent on the question of restitution for “Jane Doe,” the 15-year-

old victim.⁶⁶ Although Barclay pled guilty to a crime under Chapter 77 of Title 18 (18 U.S.C. §1591), the issue of mandatory restitution was not raised by prosecutors in the plea hearing or the sentencing hearing.⁶⁷ In the final judgment, the court sentenced Barclay to 121 months in federal prison and ordered him to pay \$100 to a general crime victims' fund and a fine of \$15,000.⁶⁸ Neither the magistrate judge or the district judge challenged the prosecution's omission.

Example 5: Extraterritorial Jurisdiction and Restitution

United States v. Baston illustrates a court's reluctance to invoke extraterritorial jurisdiction for restitution purposes. A federal jury in the Southern District of Florida convicted defendant Damion St. Patrick Baston of sex trafficking and related crimes, finding that he had used violence and coercion to force multiple women into prostitution in the United States, Australia, and the United Arab Emirates.⁶⁹ The court sentenced Baston to 25 years in prison, followed by a lifetime of supervised release, and ordered him to pay \$99,270.00 in restitution to three adult victims.⁷⁰ In determining the restitution award, the court calculated the value of the victims' services to the defendant by multiplying the number of hours that each victim testified she was forced to work by the amount she charged, minus estimated living expenses.⁷¹ However, the court declined to award an additional \$400,000 in restitution to one victim, K.L., who earned this amount while she was trafficked by the defendant in Australia.⁷² The court held that the extraterritorial application of 18 U.S.C. §1593 exceeded the authority of Congress under both the Foreign Commerce Clause and the Due Process Clause.⁷³

The government appealed the decision. The Eleventh Circuit Court of Appeals reversed, stating, "Congress has the power to require international sex traffickers to pay restitution to their victims even when the sex trafficking occurs exclusively in another country."⁷⁴ The Eleventh Circuit Court of Appeals vacated the district court's restitution order and remanded the decision with the instruction to increase K.L.'s restitution award to include her forced prostitution in Australia.⁷⁵

2. The Role of Federal Prosecutors

Prosecutors were *more* likely to request restitution in federal criminal human trafficking cases in the updated data set than they were in the original data set for the 2014 Mandatory Restitution Report. But prosecutors were *less* likely to be successful.⁷⁶ The largest percentage increase in requests appeared in plea agreements, but the data set also reflects an increase in the number of requests made in dedicated sentencing documents. Specific filings that seek restitution are labor-intensive, but are also more likely to be successful.⁷⁷ Overall, prosecutors requested restitution in 67% of trafficking cases, up from 63% in the prior data set. But these same prosecutors encountered a 27% lower success rate.

U.S. Attorneys' Offices across the country have shown improvement on restitution. According to the 2014 Mandatory Restitution Report, roughly 71% (36) of United States Attorneys' Offices

(USAOs) that brought Chapter 77 claims requested restitution in one or more cases. The 2014 data showed that 55% (28) of those offices were successful in obtaining an award.⁷⁸

In contrast, the 2016 data set shows that 90% (60) of USAOs that brought Chapter 77 cases requested restitution in one or more of those cases.⁷⁹ And the number of jurisdictions with at least one case in which restitution was ordered rose from 55% to 61%.⁸⁰

Twenty-five of the 94 USAOs had perfect records with respect to restitution requests. In every trafficking case federal prosecutors brought in that jurisdiction, they requested mandatory restitution.⁸¹ Of these 25 USAOs, 21 brought two or more cases, and eight USAOs had five or more cases. Most notable is the Northern District of Georgia, which requested and received restitution in all five of the trafficking cases it prosecuted during the report's date range.

3. The Role of Prosecutors: Case Studies

i Highest Awards

Federal prosecutors in the Eastern District of New York obtained the highest restitution order amount in a sex trafficking case during the reporting period in *United States v. Hernandez*.⁸² The Hernandez case involved a large, international sex trafficking ring operating out of Mexico. The court awarded three victims recruited from Mexico for forced prostitution a total of \$3,060,135.96.⁸³

The Eastern District of New York won three of the top five highest restitution order amounts in this report's updated data set. In addition to *United States v. Hernandez*, the USAO obtained \$1,222,165 in *United States v. Lopez-Perez*, a sex trafficking case involving three defendants,⁸⁴ and \$1,033,336 in *United States v. Estrada-Tepal*, a sex trafficking case involving four defendants.⁸⁵

Federal prosecutors in the District of Colorado obtained the highest restitution order in a labor trafficking case during the relevant reporting period: \$3,790,338.55 for 27 victims in *United States v. Kalu*.⁸⁶ The case involved the trafficking of highly-skilled nurses to a fake university in Colorado.⁸⁷ Defendants fraudulently obtained H-1B visas for the nurses, who had paid significant fees for purportedly excellent (and legal) jobs in the United States to teach in a nursing school.⁸⁸ Instead, the victims found themselves held in forced labor under threat of deportation.⁸⁹ A jury convicted Kalu on 89 counts of mail fraud, visa fraud, human trafficking, and money laundering; the court sentenced him to 130 months in prison.⁹⁰

ii Use of Forfeiture to Fund Mandatory Restitution for Victims

Prosecutors in the Southern District of Texas used forfeiture statutes to benefit trafficking victims. In *United States v. Medeles-Arguello*, 13 defendants pled guilty in an international sex trafficking case involving victims as young as 14.⁹¹ A jury convicted Hortencia Medeles-Arguello, the lead defendant, on all counts: conspiracy to commit sex trafficking, conspiracy to harbor aliens, aiding and abetting to commit money laundering, and conspiracy to commit money laundering.⁹²

Thirteen other defendants pled guilty; sentences ranged from 18 months to life in prison. The court also ordered a total of \$1,494,929.10 in restitution to 15 sex trafficking victims.⁹³ Finally, the court ordered defendants to forfeit assets. The court ordered that proceeds of the sale of forfeited property in excess of the \$300,000 monetary judgment were to be applied towards restitution.⁹⁴

iii Restitution Requests in the Absence of Victim Cooperation

Victims, who frequently do not have counsel to assist them in navigating the criminal justice system, are sometimes reluctant to assist in calculating restitution. Under 18 U.S.C. §1593, mandatory restitution can be calculated with little or no input from the victim. *United States v. Ira Richards*, a case prosecuted in the S.D.N.Y., provides a case study.⁹⁵

Richards brutally exploited two minor victims, regularly beating and raping them, and forcing them to meet prostitution earnings quotas.⁹⁶ When one victim tried to escape, Richards made her strip and kneel, then proceeded to beat her with an umbrella.⁹⁷ He then forced her to have sex with customers while still injured.⁹⁸ A second victim suffered similar violence; Richards choked her and “struck her with a studded belt until the belt broke.”⁹⁹ Eventually, the victims escaped and reported the defendant to the police.¹⁰⁰

Richards pled guilty and was sentenced to 240 months in prison.¹⁰¹ Richards’ violence traumatized and terrorized his victims. “Victim-1” provided a written statement at sentencing in which she explained that she was afraid to go outside, at risk of being found by one of her trafficker’s associates.¹⁰² She stated:

Meeting [Richards] was the worst thing that happened to my life. I’m still trying to get over the beatings. I[] still wake up out [of] sleep thinking he’s standing over me. I’m also still scared of being outside for [too] long thinking that him or whoever he talks to will find me. I’m very happy that he was caught. I’m also happy that my child and I got out of that life safe because we could of gotten Killed in that situation. I just want closure to know me and my child are safe.¹⁰³

Understandably, this victim was unwilling to testify at Richards’ trial. The second victim did not provide any information to prosecutors. Federal prosecutors in the Southern District of New York still fought for mandatory restitution.

The prosecutor used information Victim-1 provided in a private interview to calculate the mandatory restitution owed to both victims under the law.¹⁰⁴ Based on this victim’s statements, the government conservatively estimated that Victim-1 had seen at least one customer per day for 60 days (and sometimes many more).¹⁰⁵ She earned at least \$150 per day for the defendant. Multiplying the earnings (\$150) by the number of days worked (60), the government arrived at

the number \$9,000.¹⁰⁶ Victim-1 also provided the information that allowed the government to assess what “Victim-2” was owed under the law: Victim-2 made at least \$150 per day for 90 days, so the government requested \$13,500 on her behalf.¹⁰⁷ The court ordered the full restitution amounts requested for both victims.¹⁰⁸

Notably, prosecutors requested restitution in this case solely by reference to the defendant’s earnings. The victims’ additional out-of-pocket losses – for example, medical bills and counseling costs – were neither requested nor factored into the court’s order. While this resulted in a smaller total award, it demonstrated that restitution can be requested and obtained even when victims do not participate in the calculations. The record frequently contains sufficient information for a prosecutor to estimate the defendant’s earnings – *the value of the victim’s services* – from the underlying crime. In contrast, a victim’s out-of-pocket losses are more difficult to ascertain unless the victim provides receipts and documentary evidence. Restitution awards calculated without a victim’s input are likely to be somewhat smaller. But these restitution orders remain important – and mandatory.

Restitution orders must never be contingent on a victim’s willingness to seek them – or, for that matter, her willingness to participate or cooperate during the criminal proceedings. Unfortunately, it is common for prosecutors to affirmatively disclaim restitution when the victim does not cooperate. In 26 of the 41 cases (63%) in which prosecutors affirmatively disclaimed restitution, the reason given was that the victim didn’t request it. A trafficking victim’s unwillingness to cooperate in calculating restitution need not be a barrier to restitution, as demonstrated in *United States v. Ira Richards* (discussed above). Trafficking victims can waive restitution by assigning the court-ordered funds to a general victim fund.

Prosecutors in the Northern District of California have also demonstrated that restitution need not hinge on victims’ cooperation. Four out of five cases brought in the Northern District of California in the timeframe of this report included restitution requests, and three yielded restitution orders.¹⁰⁹ Yet it does not appear that victims cooperated in seeking restitution in any of the three cases with restitution. The handling of these cases provides a refreshing contrast to the norm. Mandatory restitution requires courts to order restitution. It is not mandatory for victims to participate.

In *United States v. Crutchfield*, for example, two defendants faced multiple charges of sex trafficking and production of child pornography.¹¹⁰ Both defendants pled guilty.¹¹¹ The pre-sentence report included a recommendation that each victim receive restitution in the amount of \$1,000; both defendants’ plea agreements included provisions requiring them to pay a *minimum* of \$1,000.¹¹² In its sentencing memorandum, the government noted that it had “not received any request or support for additional restitution beyond that to which the parties have already agreed.”¹¹³ Therefore, federal prosecutors limited the restitution request to “\$2,000.00, as recommended by the [pre-sentence report].”¹¹⁴ The court awarded restitution in this amount.¹¹⁵

Prosecutors in the Northern District of California used the same strategy to secure \$4,000 for the victims in *United States v. Ahmad*, a case that, like *United States v. Crutchfield*, involved charges of sex trafficking and child pornography.¹¹⁶ As in *Crutchfield*, the prosecutors in *Ahmad* arranged for restitution to be awarded *by default* – meaning that the victims’ refusal to cooperate would not ultimately stand in the way of a restitution order.¹¹⁷

In a third case in the Northern District of California, *United States v. Broussard*, federal prosecutors reported having “made efforts to have the named victims submit documentation to substantiate their losses.”¹¹⁸ However, both victims proved “unwilling or unable to deal with this issue directly at this time and have not submitted any statements or documentation.”¹¹⁹

Nevertheless, the prosecutors argued for restitution in the sentencing memorandum submitted to the court. Noting that the victims had not provided receipts or information, the prosecutors stated:

The government anticipates that it can satisfy its burden, however, by reference to the Defendant’s bank records which were produced pursuant to subpoena (and which were previously provided in discovery to the Defendant and U.S. Probation), and provide the Court with a conservative estimate of the Defendant’s ill-gotten gains from his criminal behavior and victimization of these minors. Both minor victims have stated that while they were engaged in their travel around the country to engage in prostitution, they were required to send the money they earned back to Defendant either via money-gram or direct deposit into his various accounts. During its investigation, the government was only able to locate one Bank of America account in Defendant’s name, and the evidence (in the form of deposit slips and statements) corroborates the victims’ statements that they made deposits of various amounts into Defendant’s account while in other states. The government’s initial estimate at this time is that over \$72,000 was deposited in this fashion into Defendant’s Bank of America account during the relevant time period, and many of the deposit slips associated with these transactions bear the initials or signatures of the minor victims.¹²⁰

The government then requested a further hearing to address the issue of how much restitution should be paid to the victims, but also stated that the defendant “agreed under the terms of his plea agreement to provide restitution in an amount to be determined by the Court, but in no event less than \$5,000 per victim.”¹²¹ The court ordered restitution in the amount of \$10,000, or \$5,000 to each victim.¹²²

iv Use of Creative Calculation Methodologies

As noted above, restitution may be calculated under the Fair Labor Standards Act or as the defendant's earnings; the victim is entitled to whichever is greater.¹²³ The "defendant's earnings" method of calculation is more common in sex trafficking cases, as victims' hourly earnings from performing commercial sex acts invariably exceed minimum wage. However, in *United States v. Roshaun Porter*, prosecutors took a novel approach.¹²⁴ Defendant Porter met the victims through websites, such as Craigslist, and, after, gaining their trust, forced the victims to sell sex.¹²⁵ He became violent, using physical threats and verbal abuse to control his victims.¹²⁶ Porter and his co-defendant, Horn, both pled guilty, and were sentenced to 240 months and 78 months in prison, respectively.¹²⁷

In an unusual move, the government made its request based on the value of one victim's services as determined under the Fair Labor Standards Act, rather than based on the direct earnings from the victim's labor.¹²⁸ Prosecutors pointed out that even though the victim only saw between one and six customers per day, she also "was forced by the Defendants to stay at the work location when she was not 'servicing' a customer to answer calls from prospective customers."¹²⁹ By including this additional wait time as work time, prosecutors calculated that she worked roughly 16 hours per day, for a total of 112 hours per week; prosecutors then multiplied this number by the minimum wage (\$7.25/hour) plus overtime owed (\$288.00/week).¹³⁰ After adding meal and lodging allowances to the back wages due, the total restitution amount requested from defendant Horn was \$69,719.34.¹³¹ The court awarded the full amount requested.¹³² The court ordered the second defendant to pay \$866,244.68 in restitution based on similar calculations.¹³³

4. The Role of Defense Counsel

As reported in the 2014 Mandatory Restitution Report, defendants continue to make the same losing arguments in their efforts to derail restitution orders. Happily, however, most judges reject these arguments. The law is clear – restitution is mandatory for victims of federal human trafficking offenses. Nevertheless, nearly all defendants present the same two arguments for why they should not have to pay restitution. The relevant case law instantly rebuts both claims.

The first defense argument is that the victim cannot recover because prostitution is illegal.¹³⁴ This conclusion is inconsistent with 18 U.S.C. §1593 and relevant case law. In *United States v. Mammedov*, the Second Circuit held that "the express terms of 18 U.S.C. §1593 require that the victims in this case, i.e. persons who engaged in commercial sex acts within the meaning of 18 U.S.C. §1591, receive restitution, notwithstanding that their earnings came from illegal conduct."¹³⁵ In *United States v. Cortes-Castro*, the Eleventh Circuit Court of Appeals similarly dispensed with the argument that restitution would reward the victim's illegal activity, stating simply that "[t]hat argument is preposterous."¹³⁶ The Ninth Circuit also held in *United States v. Fu Sheng Kuo* that the TVPA "mandates restitution that includes a defendant's ill-gotten gains."¹³⁷ No federal appellate court in any circuit has ever held to the contrary.

The second argument defendants frequently deploy is that the calculations made to quantify the defendant's earnings are insufficiently precise.¹³⁸ Although the government does bear the burden of establishing the victim's losses, it need only do so "by a preponderance of the evidence."¹³⁹ Restitution need not be determined "with mathematical precision."¹⁴⁰ Awards are often ordered based on victim testimony alone. There is no requirement that the victim's earnings be documented; indeed, they rarely are.

Nearly every defendant facing sentencing in a sex trafficking case brandishes one or both of these arguments. But some defendants are much more creative. In *United States v. Carson*, discussed above, the defense argued that, because the defendant only had \$82 in his pocket at the time of arrest, he was "certainly not suggestive of a person who had taken \$5,600 for prostitution activities."¹⁴¹ The defendant in *United States v. Graham* objected to the amount claimed, saying that the government's estimate would mean that "the three victims in this case are the hardest working and most successful prostitutes in the history of prostitution."¹⁴² Rejecting this argument, the court awarded \$366,000 in restitution to the three victims.¹⁴³

E. The Failure to Collect Restitution

Restitution is only rarely awarded. It is virtually never collected. The Attorney General's FY2015 and FY2016 *Annual Reports to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons* only confirm this conclusion. Each report includes an appendix listing all restitution orders for defendants sentenced in that fiscal year.¹⁴⁴ Of the 32 defendants listed in the FY2015 report, only seven had even begun paying their restitution at the time the government's report was published. Of the more than \$4,018,988 ordered in restitution in that report,¹⁴⁵ the government had collected a grand total of \$987, or 0.025% of the restitution ordered as of the publication date.¹⁴⁶ The largest amount any defendant had paid was \$300, a payment towards a \$51,844 restitution order.¹⁴⁷

The data for FY2016 showed improvement. Of the 75 defendants listed in the FY2016 report, 25 had made payments on the restitution orders. Four had paid in full. Of the approximately \$9,166,689 total ordered in restitution in FY2016, the government had collected \$257,449, or 2.8% of the total restitution owed.¹⁴⁸

The Justice for Victims of Trafficking Act (JVTA), enacted in 2015, requires that assets forfeited in criminal trafficking cases be used to pay restitution orders.¹⁴⁹ But the data provided in the Attorney General's Reports to Congress suggest that the change in legislation has had only a marginal impact. Based on the Attorney General's own reports, reserving forfeited funds has increased restitution collection only slightly. The law's full effect on collections may not yet have been realized, but early indications show that there is more work to be done.

JVTA's provisions cannot be helpful unless courts order restitution in the first instance. And unfortunately, there are multiple cases in which courts have forfeited assets from defendants, but failed to order mandatory restitution to victims. Not only do those judgments direct the funds to

the U.S. Treasury (instead of to victims), but they also preclude the possibility that victims will be able to recover in a civil suit. In four cases included in the updated data set, courts forfeited cash and assets from defendants, but did not order any mandatory restitution to victims.¹⁵⁰ For the U.S. Treasury to collect forfeited funds – while trafficking victims receive nothing – offends both the substance and the purpose of the JVTA.

The challenges of collecting of restitution are not unique to victims of trafficking. Indeed, the Department of Justice Office of the Inspector General (OIG) Evaluation and Inspections Division painted a troubling picture of restitution collection across the board in a 2015 report.¹⁵¹ The OIG concluded that “in many cases, USAOs have not devoted the resources or put in place the policies and procedures necessary” to ensure that crime victims receive full and timely restitution.¹⁵² That report cited significant issues, such as insufficient staffing in Financial Litigation Units (FLUs), the USAO prosecution units assigned to enforce and collect restitution for victims. That report also included excellent recommendations to USAOs, including guidance to seek restitution prior to sentencing. As the OIG suggested,

...the FLU, Criminal Division, and Asset Forfeiture unit should focus on restitution debts pre-judgment, because this is the best chance to recover assets. Pre-judgment efforts are likely to increase the recovery of assets because defendants (1) have greater incentive to voluntarily disclose financial information and agree to pay monetary penalties when doing so has the potential to favorably influence their sentence, and (2) have less time to hide or dissipate their assets.¹⁵³

One case in particular demonstrates that this pre-judgment strategy can successfully ensure that restitution is *collected* – not just ordered. In *United States v. Al Homoud*, the defendants, a husband and wife from Qatar and the United Arab Emirates, faced forced labor charges.¹⁵⁴ The indictment alleged that the pair trafficked two women from abroad, forcing them to work as housekeepers at their residence in San Antonio, Texas.¹⁵⁵ Eventually, one of the victims escaped from the apartment in which they were forced to live, and contacted the police.¹⁵⁶ The apartment lacked furniture, toilet paper, and other basic amenities.¹⁵⁷

Both defendants pled guilty, the husband to visa fraud, the wife to misprision of a felony.¹⁵⁸ Prior to sentencing, the judge signed an order requiring that the full amount of restitution due in the case – \$120,000 – be held in the registry of the United States District Court prior to entry of the judgment.¹⁵⁹ This guaranteed that the victims would receive the restitution. This pre-payment was particularly important in a trafficking case in which the defendants voluntarily departed the United States immediately following the sentencing hearing.¹⁶⁰ This is one of just four cases in FY2016 in which the defendants had paid the restitution in full by the end of the fiscal year.

F. Searching for Solutions

The U.S. Government has acknowledged the importance of restitution – and collection of restitution.¹⁶¹ The Attorney General’s Report to Congress in FY2015 specifically recommended that the Department of Justice (DOJ) “[c]ollaborate with governmental and nongovernmental partners to enhance financial investigations to disrupt, dismantle, and disable human trafficking networks, seize criminal proceeds, and secure restitution for victims.”¹⁶²

To the Department of Justice’s credit, the Human Trafficking Prosecution Unit (HTPU), the Child Exploitation and Obscenity Section (CEOS), and the Money Laundering and Asset Recovery Section (MLARS) have worked to implement this recommendation. HTPU and CEOS both increased training on mandatory restitution at the National Advocacy Center (NAC) in South Carolina. That training may be responsible for the uptick from 63% to 67% in restitution requests submitted in trafficking cases by federal prosecutors. And MLARS attorneys conducted extensive training sessions for anti-trafficking NGOs and advocates on recovering forfeited assets for trafficking victims through restoration and remission.¹⁶³ In 2018, the DOJ created an internal working group on restitution in trafficking cases. The Department of Justice has encouraged increased use of the Treasury Offset Program (TOP), a centralized offset program administered by the Bureau of the Fiscal Service’s Debt Management Services (DMS), to collect restitution.¹⁶⁴ The program can be used to withhold tax refunds and other federal payments to defendants who owe restitution in federal criminal cases.¹⁶⁵

Individual USAOs also deserve commendation for significant efforts to cooperate with non-governmental organizations and pro bono counsel. The District of South Carolina, for example, under the leadership of then-Acting U.S. Attorney Beth Drake, hosted a series of training programs on restitution for pro bono attorneys in the state. Similarly, federal prosecutors at the USAO for the Middle District of Florida participated in training on restitution and forfeiture. These efforts are laudable and should be encouraged by the Department of Justice. Ultimately, the impact of all of these efforts must be measured in dollars provided to victims. That is the only metric that matters.

IV. CONCLUSIONS AND RECOMMENDATIONS

Restitution is mandatory in federal human trafficking prosecutions; however, it is rarely ordered, and even less frequently collected. The original research in the 2014 Mandatory Restitution Report projected that more restitution requests submitted to courts by federal prosecutors would eliminate the problem. But this has not proven to be true: in the years since the first report was published, prosecutorial requests have increased, while orders have plummeted.

Unfortunately, even when restitution is ordered, it is rarely received by victims. These twin failures – failure to order and failure to collect restitution – undermine trafficking survivors’ confidence in the judicial system. The following recommendations may help address these challenges:

To Federal Prosecutors:

- Seek mandatory restitution in all human trafficking cases, including those cases that end in plea agreements;
- Request restitution under the federal human trafficking statute, 18 U.S.C. §1593¹⁶⁶;
- Appeal all district courts' denials of mandatory restitution;
- Collaborate with the Asset Forfeiture and Financial Litigation Units early in cases to identify assets to cover restitution;
- Advocate for forfeited assets to go to trafficking victims first and not to the U.S. Treasury;
- Draft plea agreements to include restitution;
- Arrange for pre-payment of restitution prior to sentencing through plea agreement provisions;
- File appropriate paperwork for restoration of forfeited assets to trafficking victims;
- File for withholding from defendants under the Treasury Offset Program;
- In the case of child victims, advocate for appointment of a guardian *ad litem* to represent the best interests of the child, or a pro bono attorney to represent the child directly; and
- Encourage all victims to obtain victim-witness rights representation counsel to advocate for restitution – and collection of restitution.

To the Federal Judiciary:

- Provide training to all federal judges on mandatory restitution under 18 U.S.C. §1593 for victims of human trafficking;
- Order mandatory restitution to trafficking victims under 18 U.S.C. §1593 in cases brought under Chapter 77 of Title 18;

- Ask prosecutors in all human trafficking criminal cases whether they plan to request mandatory restitution – and challenge them when they do not;
- Track data on restitution for trafficking victims ordered in U.S. federal courts; and
- Track data on collection of restitution for trafficking victims in the federal system.

To Financial Litigation Units:

- Aggressively enforce criminal restitution orders in human trafficking cases;
- Collaborate with AUSAs and asset forfeiture prosecutors in each of the 94 USAOs to maximize collection of restitution orders; and
- Increase training on criminal restitution for trafficking victims.

To the Probation Office:

- Train probation officers to include mandatory restitution for trafficking victims in all pre-sentence reports submitted to courts;
- Encourage probation officers to interview trafficking victims and/or their advocates to discuss restitution and losses for the presentence report;
- Include restitution recommendations in all presentence reports; and
- Train probation officers to raise mandatory restitution for trafficking victims in pre-sentencing meetings and discussions with federal judges.

To the Department of Justice Human Trafficking Prosecution Unit and the Child Exploitation and Obscenity Section (CEOS):

- Expand training of federal prosecutors on mandatory restitution in human trafficking cases;
- Include restitution in all plea agreements for human trafficking cases;
- Train federal prosecutors to request restitution under 18 U.S.C. §1593 so that the funds may be excluded from gross income for federal income tax purposes per Treasury Notice 2012-12;

- Advocate for pre-sentencing payment of restitution into court registries or attorney escrow accounts;
- Request criminal restitution for child victims of sex trafficking;
- Amend the U.S. Attorneys' Manual to include instructions on mandatory restitution for adult and child sex trafficking victims under 18 U.S.C. §1593;
- Provide multi-year reporting on restitution orders entered and collection on restitution orders in trafficking cases;
- Add restitution in trafficking cases as a performance review criterion for federal prosecutors;
- Encourage USAOs to work with victims' counsel (if applicable) in human trafficking criminal matters to enforce victims' rights, including the right to mandatory restitution; and
- Continue training on mandatory restitution and collection of restitution at the National Advocacy Center (NAC).

To the Department of Justice Money Laundering and Asset Recovery Section (MLARS, formerly AFMLS):

- Continue training non-governmental organizations and victim advocates on restoration and remission for trafficking victims;
- Track data on restitution provided to human trafficking victims through the restoration process;
- Continue to invite non-governmental organization anti-trafficking experts to collaborate with asset forfeiture attorneys; and
- Continue to press for early collaboration between asset forfeiture attorneys, Financial Litigation units, and prosecuting AUSAs to collect restitution in all cases.

¹ 18 U.S.C. §1593.

² 18 U.S.C. §1593(b)(1). *See also* The U.S. Dep't of Justice, United States Attorney's Office, *Understanding Restitution*, <https://www.justice.gov/usao-ndga/victim-witness-assistance/understanding-restitution> (last visited July 25, 2018).

³ 18 U.S.C. §1593(b)(3). The value of the victim's services is typically measured by calculating the defendant's earnings from the crime. However, the victim is entitled to a minimum of the value of her labor as guaranteed under federal labor laws: the "full amount of the victim's losses" includes "the greater of the gross income or value to the defendant of the victim's services or labor or the value of the victim's labor as guaranteed under the minimum wage and overtime guarantees of the Fair Labor Standards Act (29 U.S.C. §201 et seq.)." *Id.*

It is a common misperception that restitution for the victim's services is not owed when the services are criminalized (for example, if the victim is forced to engage in commercial sex acts). This is false. *See United States v. Mammedov*, 304 F. App'x. 922, 927 (2d Cir. 2008) (holding that "the express terms of 18 U.S.C. §1593 require that [trafficking victims] receive restitution, notwithstanding that their earnings came from illegal conduct"). No appeals court has adopted a contrary view.

⁴ Levy, Vandenberg, and Chen, *When 'Mandatory' Does Not Mean Mandatory: Failure to Obtain Criminal Restitution in Federal Prosecution of Human Trafficking Cases in the United States* (2014), <http://www.htlegalcenter.org/wp-content/uploads/mandatory.pdf> (last visited July 25, 2018) (hereinafter "2014 Mandatory Restitution Report").

⁵ *See id.* at 3.

⁶ *See id.* at 5.

⁷ Researchers measured the aggressiveness of the prosecutor's approach by assessing the type of document filed and the thoroughness of the request. The most aggressive requests were made in court filings, particularly sentencing memoranda, exclusively dedicated to the issue of restitution. These requests were the most successful, yielding restitution orders in 93% of cases. *See id.* On the other end of the spectrum, when no request was made, courts ordered restitution in only 10% of cases. *See id.*

⁸ The 2014 Mandatory Restitution Report drew on data from federal criminal trafficking cases brought under Chapter 77 of Title 18 of the U.S. Code between January 1, 2009 and December 31, 2012 that closed on or before February 2, 2014.

⁹ *See id.* at 4.

¹⁰ The data for this report includes federal criminal trafficking cases brought under Chapter 77 of Title 18 of the U.S. Code on or after January 1, 2013, and closed on or before June 4, 2016. The data set also includes cases filed between January 1, 2009 and December 31, 2012, but closed between February 2, 2014 (the close date of the 2014 Mandatory Restitution Report) and June 4, 2016 (the close date for this report).

¹¹ There are 94 U.S. Attorneys' Offices in the United States. Despite the improvement, it remains troubling that only 43% of U.S. Attorneys' Offices had at least one restitution order in a human trafficking case in the updated data set.

¹² *See infra* Appendix A.

¹³ *See id.*

¹⁴ A restitution order must be collected by federal authorities. For a discussion of restitution collection issues, *see infra* pp. 24-25.

¹⁵ The previous 2014 Mandatory Restitution Report included all cases filed between January 1, 2009 and December 31, 2012 that closed on or before February 2, 2014. Researchers found these cases on Bloomberg Law, PACER, and websites maintained by the Department of Justice and U.S. Attorneys' Offices. The authors recommend that the federal government maintain (and release publicly) a list of federal trafficking cases filed annually.

¹⁶ A court dismissed one sting case, causing an overlap of one case.

¹⁷ A case was considered to have “sufficient documentation” as long as a plea agreement or a government sentencing memorandum was available. However, cases in which restitution requests appeared elsewhere were included regardless of the availability of the listed documents.

¹⁸ These categories replicated those used in the 2014 Mandatory Restitution Report.

¹⁹ The 2014 Mandatory Restitution Report also included a category for requests that appeared in writing in any other document. There were no such requests in the 2016 data, so this category was omitted.

²⁰ This includes charges for conspiracy to commit Chapter 77 crimes.

²¹ *United States v. Penzato*, 3:12-CR-00089 (N.D. Cal. 2012), a case brought in the Northern District of California in 2012, provides an excellent example. The defendants pled guilty to conspiracy to possess illegal identification documents. See Government’s Sentencing Memorandum, *United States v. Penzato*, 3:12-CR-00089 (N.D. Cal. 2012) at 1. Despite the fact that the plea was to a non-trafficking crime, the government stipulated as part of the plea deal that the defendant would pay restitution in the amount of \$13,000 to the victim – an amount calculated based on the value of the labor performed by the victim for the defendants. See *id.* “As originally filed and described in the Indictment and affidavit supporting the Complaint, this case concerned the conditions of [the victim]’s employment while working for the Penzatos. Those allegations are not part of the current charge, or of the plea agreement before the Court. The agreed restitution amount, however, is based on the government’s calculation of pay that the Penzatos owe[d] [the victim] for time spent working for them in 2009.” *Id.* at 2.

²² Four additional cases included labor charges under 18 U.S.C. §1589, but did not include facts supporting allegations of forced labor. In all four cases, the underlying labor was exclusively commercial and sexual in nature. See *United States v. Porter*, 8:12-cr-00097 (C.D. Cal. 2014), *United States v. West*, 6:14-cr-06003 (W.D.N.Y. 2014), *United States v. Drayton*, 1:15-cr-00002 (M.D.N.C. 2015), and *United States v. James Smith*, 2:13-cr-00383 (D.N.J. 2013). In *United States v. Porter*, the labor claim was dropped in the superseding indictment. The prosecutors requested restitution in a dedicated document and received a court order for \$866,244.68. In *United States v. West*, one defendant was charged with, and pled guilty to, forced labor under 18 U.S.C. §1589, while the other was charged with trafficking under 18 U.S.C. §1591 and 18 U.S.C. §1594, and pled guilty to Transportation With Intent To Engage in Criminal Sexual Activity under 18 U.S.C. §2423(a). In *United States v. Drayton*, the only trafficking charge was brought under 18 U.S.C. §1589; the prosecutor requested restitution in the plea; none was awarded. Finally, in *United States v. Smith*, the only trafficking charge was brought under 18 U.S.C. §1589; the prosecutor requested restitution in a dedicated document (which was unavailable, but referenced in the restitution order). Restitution was ordered in the amount of \$1,000. Even if one were to count the final two cases as labor, this would not significantly change the analysis: the percentage of cases with requests would rise to 60%, and the percentage of cases with awards would stay the same. The success rate of labor trafficking restitution requests would fall to 83%. The change to sex trafficking numbers would be imperceptible at the relevant level of analysis.

²³ A court may not refuse to issue restitution because of the defendant’s economic circumstances. See 18 U.S.C. §2259(b)(4)(B)(i).

²⁴ 18 U.S.C. §1591 includes a mandatory minimum sentence of 10 years for sex trafficking of a minor over the age of 13 without the use of force, fraud, or coercion, and a mandatory minimum sentence of 15 years for sex trafficking of a minor under the age of 14 and for sex trafficking using force, fraud, or coercion. See 18 U.S.C. §1591(b).

²⁵ See Figures 3 and 4, *supra* pp. 8-9. For a full list of included cases, see Appendix B.

²⁶ See Complaint at 2-13, *United States v. Carson*, 1:11-cr-00918 (N.D. Ill. Dec. 30, 2011). This case was brought in the Northern District of Illinois; the U.S. Attorney's Office in this jurisdiction brought a total of four cases within the timeframe of this report, all of which resulted in convictions or guilty pleas, and two of which resulted in restitution orders. Prosecutors requested restitution in all four cases. See *United States v. Carson*, 11-cr-00918 (N.D. Ill. 2011), *United States v. Hull*, 13-cr-00216 (N.D. Ill. 2013), *United States v. Misher et al.*, 14-cr-00107 (N.D. Ill. 2014), and *United States v. Smith*, 12-cr-00246 (N.D. Ill. 2012).

²⁷ See *id.* at 10.

²⁸ See Order, *United States v. Carson*, 1:11-cr-00918 (N.D. Ill. Dec. 12, 2013).

²⁹ See Government's Objection to Presentence Investigation Report and Sentencing Memorandum at 23-24, *United States v. McKenzie Carson*, 11-cr-00918 (N.D. Ill. October 5, 2015).

³⁰ Transcript of Sentencing Proceedings at 123, *United States v. Carson*, 11-cr-00918 (N.D. Ill. October 15, 2015).

³¹ *Id.* at 126.

³² See *id.* at 123.

³³ See *id.*

³⁴ See *id.* at 125.

³⁵ *Id.* at 128.

³⁶ See Sentencing Transcript at 20-21, *United States v. Gemma*, 1:12-cr-10155 (D. Mass. Jan. 5, 2015).

³⁷ *Id.* at 27.

³⁸ *Id.* at 28.

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ See Plea Agreement at 1, 2, *United States v. Lee*, 1:13-cr-00678 (D. Md. Feb. 13, 2015).

⁴² See *id.* at 5, 7.

⁴³ See Judgment at 2, 5, *United States v. Lee*, 1:13-cr-00678 (D. Md. Mar. 31, 2015).

⁴⁴ See generally Motion to Amend Restitution Order, *United States v. Lee*, 1:13-cr-00678 (D. Md. Apr. 9, 2015).

⁴⁵ See *id.* at 2.

⁴⁶ See generally Individual Victim Impact Statement, Exhibit 1, Motion to Amend Restitution Order, *United States v. Lee*, 1:13-cr-00678 (D. Md. Apr. 9, 2015).

⁴⁷ See Motion to Amend Restitution Order at 3, *supra* note 44.

⁴⁸ See Response in Opposition to Motion to Amend at 8, *United States v. Lee*, 1:13-cr-00678 (D. Md. Apr. 30, 2015).

⁴⁹ See *id.*

⁵⁰ See Memorandum Denying Government Motion to Amend Restitution Order, *United States v. Michael Lee*, 1:13-cr-00678 (D. Md. June 2, 2015).

⁵¹ *Id.*

⁵² See Judgment, *Lee*, *supra* note 43 at 5. This result might have been avoided in two ways. First, if the victim's losses were truly not ascertainable prior to sentencing, the government should have nevertheless requested restitution in specific terms, and petitioned the court to set a date to ascertain the victim's losses within 90 days of sentencing. Second, as discussed below, even without the victim's input, prosecutors could have ascertained the losses for purpose of the restitution order.

⁵³ *United States v. Doe*, 488 F.3d 1154, 1159-60 (9th Cir. 2007).

⁵⁴ See Transcript of Proceedings, Sentencing Hearing at 25, *United States v. Thomas*, 3:12-cr-04832 (S.D. Cal. Aug. 24, 2016).

⁵⁵ See *id.*

⁵⁶ See *id.* at 25-27.

⁵⁷ See *id.* at 28.

⁵⁸ See *id.* at 25.

⁵⁹ *Id.* at 28.

⁶⁰ See generally Plea Agreement, *United States v. Smith*, 12-cr-00246 (N.D. Ill. Jan. 11, 2013).

⁶¹ See *id.* at 4.

⁶² See *id.* at 6.

⁶³ See Government's Sentencing Memorandum at 21-22, *United States v. Smith*, 12-cr-00246 (N.D. Ill. Oct. 14, 2015).

⁶⁴ Transcript of Proceedings – Sentencing, at 53, *United States v. Smith*, 12-cr-00246 (N.D. Ill. Aug. 5, 2014).

⁶⁵ See Judgment at 6, *United States v. Smith*, 12-cr-00246 (N.D. Ill. Aug. 5, 2014).

⁶⁶ 7:13-cr-00269 (W.D. Tex. 2014).

⁶⁷ See Findings of Fact and Recommendation on Felony Guilty Plea at 1, *United States v. Barclay*, 7:13-cr-00269 (W.D. Tex. Nov. 21, 2013); see generally Change of Plea Hearing, *United States v. Barclay*, 7:13-cr-00269 (W.D. Tex. Nov. 21, 2013), Sentencing, *United States v. Barclay*, 7:13-cr-00269 (W.D. Tex. Mar. 24, 2014).

⁶⁸ See Judgment at 7, *United States v. Barclay*, 7:13-cr-00269 (W.D. Tex. Feb. 18, 2014).

⁶⁹ See Indictment, *United States v. Baston*, 1:13-cr-20914 (S.D. Fla. Dec. 13, 2013); see generally Jury Verdict, *United States v. Baston*, 1:13-cr-20914 (S.D. Fla. July 1, 2014).

⁷⁰ See Judgment, *United States v. Baston*, 1:13-cr-20914 (S.D. Fla. February 23, 2015).

⁷¹ See *United States v. Baston*, 818 F.3d 651, 660 (11th Cir. 2016), *cert. denied*, 137 S. Ct. 850 (2017).

⁷² See *id.*

⁷³ See *id.*

⁷⁴ *Id.* at 671.

⁷⁵ On remand, the district court awarded the full total of \$499,270. See Amended Judgment at 7, *United States v. Baston*, 1:13-cr-20914 (S.D. Fla. June 24, 2016). Because the increased restitution award was handed down after the close date of this report (on June 24, 2016), this report used the amount initially awarded, \$99,270, for the purpose of reporting total restitution. In March, 2017, the Supreme Court denied cert. See 137 S. Ct. 850 (2017).

⁷⁶ See Figures 3 and 4, *supra* pp. 8-9.

⁷⁷ See 2014 Mandatory Restitution Report at 4-6 (discussing the comparative efficacy of different restitution request types).

⁷⁸ See *id.* at 8.

⁷⁹ Twelve of the jurisdictions that had brought Chapter 77 charges but had obtained no restitution orders in the first report won at least one restitution order during the time period of this report. Those jurisdictions are: C.D. Cal., D. Minn., D.S.C., D. Utah, E.D. La., N.D. Ind., N.D. Ohio, S.D.N.Y., S.D. Tex., W.D. Ky., W.D.N.Y., W.D. Tenn. See 2014 Mandatory Restitution Report, footnote 53 for a full list of jurisdictions that brought trafficking cases but obtained no restitution orders in the initial research period.

⁸⁰ All comparisons between results from the first and second data sets are discussed as percentages. Since the data sets in the 2014 Mandatory Restitution Report and this report cover time periods of different lengths, comparing raw numbers does not provide useful information.

⁸¹ The jurisdictions with perfect records for requesting restitution in every case are: D. Mass. (six requests, yielding two orders), D.Md. (seven requests, yielding no orders), D.Colo. (two requests, yielding one order), D.Conn. (two requests, yielding two orders), D.Nev. (six requests, yielding no orders), D.S.C. (five requests, yielding one order), N.D.Ga. (five requests, yielding five orders), D.N.J. (four requests, yielding one order), N.D. Ill. (four requests, yielding two orders), S.D.N.Y. (five requests, yielding four orders), W.D.N.Y. (seven requests, yielding one order), W.D.Okla. (five requests, yielding one order), D.S.D. (four requests, yielding no orders), E.D.La. (two requests, yielding one order), E.D.Tenn. (one request, yielding no orders), M.D.N.C. (two requests, yielding no orders), N.M.I. (one request, yielding one order), S.D.Ill. (one request, yielding no orders), S.D.Ind. (two requests, yielding one order), S.D.Iowa (two requests, yielding no orders), W.D.Ark. (three requests, yielding no orders), W.D.Ky. (two requests, yielding one order), W.D.La. (two requests, yielding no orders), W.D.Mo. (two requests, yielding two orders), and W.D.Va. (one request, yielding one order).

⁸² 11-cr-00297 (E.D.N.Y. 2011).

⁸³ See Judgment at 4, *United States v. Hernandez*, 11-cr-00297 (E.D.N.Y. Mar. 12, 2014). The 2014 press release issued by the USAO explicitly thanked the non-governmental organizations and pro bono counsel that had advocated on the victims' behalf. See Press Release, USAO EDNY, Member Of The Granados-Hernandez Sex Trafficking Organization, Eleuterio Granados-Hernandez, Sentenced To 22 Years In Prison: Mexican Sex Trafficker Sentenced Today In Federal Court (Mar. 7, 2014), <https://www.justice.gov/usao-edny/pr/member-granados-hernandez-sex-trafficking-organization-eleuterio-granados-hernandez>.

⁸⁴ See Amended Judgment at 4, *United States v. Lopez-Perez, et al.*, 11-cr-00199 (E.D.N.Y. Mar. 28, 2014).

⁸⁵ Judgment at 6, *United States v. Estrada-Tepal et al.*, 14-cr-00105 (E.D.N.Y. Dec. 15, 2015). Prosecutors in the Eastern District of Virginia and the Western District of Washington also obtained significant restitution orders in sex trafficking cases during the period covered by this report's updated data set.

⁸⁶ See Judgment at 8-9, *United States v. Kalu*, 12-cr-00106 (D. Colo. Feb. 21, 2014).

⁸⁷ See Indictment at 3-4, *United States v. Kalu*, 12-cr-00106 (D. Colo. Mar. 1, 2012).

⁸⁸ See *id.* at 2-6.

⁸⁹ See *id.* at 2.

⁹⁰ See Judgment at 1-5, *Kalu*, *supra* note 86.

⁹¹ 4:13-cr-00628 (S.D.Tex. 2013).

⁹² See Judgment at 1, *US v. Medeles-Arguello et al*, 4:13-cr-00628 (S.D.Tex. Feb. 2, 2016).

⁹³ See Amended Judgment at 7-8, *United States v. Medeles-Arguello*, 4:13-cr-00628 (S.D. Tex. Apr. 28, 2016).

⁹⁴ See Preliminary Order of Forfeiture at 1, *United States v. Medeles-Arguello*, 4:13-cr-00628 (S.D. Tex. Dec. 12, 2014).

⁹⁵ 1:13-cr-00818 (S.D.N.Y. 2013).

⁹⁶ See U.S. Sentencing Memo at 2, *United States v. Ira Richards*, 1:13-cr-00818 (S.D.N.Y. June 20, 2015).

⁹⁷ See *id.* at 1, 3.

⁹⁸ See *id.*

⁹⁹ *Id.*

¹⁰⁰ See *id.* at 3.

¹⁰¹ See Judgment at 2, *United States v. Ira Richards*, 1:13-cr-00818 (S.D.N.Y. July 7, 2015).

¹⁰² See Exhibit A, Victim-1 Impact Statement at 3, *United States v. Ira Richards*, 1:13-cr-00818 (S.D.N.Y. June 25, 2015).

¹⁰³ *Id.*

¹⁰⁴ See Letter from AUSA to the Hon. Lewis Kaplan at 1, *United States v. Ira Richards*, 1:13-cr-00818 (S.D.N.Y. June 24, 2015).

¹⁰⁵ *Id.*

¹⁰⁶ *Id.*

- ¹⁰⁷ See *id.* at 2.
- ¹⁰⁸ See Judgment at 5, *United States v. Richards*, *supra* note 101.
- ¹⁰⁹ See generally Judgment, *United States v. Ahmad*, 13-cr-00374 (N.D. Cal. July 14, 2015), Judgment, *United States v. Broussard*, 13-cr-00690 (N.D. Cal. Aug. 15, 2014), Judgment, *United States v. Crutchfield*, 14-cr-00051 (N.D. Cal. Jan. 26, 2016).
- ¹¹⁰ See generally Indictment, *United States v. Crutchfield*, 5:14-cr-00051 (N.D. Cal. Jan. 29, 2014).
- ¹¹¹ See United States Sentencing Memorandum at 2, *United States v. Crutchfield*, 5:14-cr-00051 (N.D. Cal. Jan. 12, 2016).
- ¹¹² See *id.* at 2, 9.
- ¹¹³ *Id.*
- ¹¹⁴ *Id.*
- ¹¹⁵ See Judgment at 6, *United States v. Crutchfield*, 5:14-cr-00051 (N.D. Cal. Jan. 26, 2016).
- ¹¹⁶ See United States' Sentencing Memorandum at 2, *United States v. Ahmad*, 13-cr-00374 (N.D. Cal. June 25, 2015).
- ¹¹⁷ See *id.* at 9.
- ¹¹⁸ United States' Sentencing Memorandum at 5, *United States v. Broussard*, 13-cr-00690 (N.D. Cal. Aug. 6, 2014).
- ¹¹⁹ *Id.*
- ¹²⁰ *Id.*
- ¹²¹ *Id.* at 6.
- ¹²² See Judgment at 5, *Broussard*, *supra* note 115.
- ¹²³ See 18 U.S.C. §1593.
- ¹²⁴ 8:12-cr-00097 (C.D. Cal. 2012).
- ¹²⁵ See Superseding Indictment at 4, *United States v. Porter*, 8:12-cr-00097 (C.D. Cal. Feb. 27, 2013).
- ¹²⁶ See *id.* at 4.
- ¹²⁷ See Amended Judgment at 2, *United States v. Porter*, 8:12-cr-00097 (C.D. Cal. Aug. 26, 2015), Judgment at 2, *United States v. Porter*, 8:12-cr-00097 (C.D. Cal. Dec. 23, 2014).
- ¹²⁸ See Government's Restitution Memorandum as to Defendant Horn at 7-8, *United States v. Porter*, 8:12-cr-00097 (C.D. Cal. Dec. 5, 2014).
- ¹²⁹ *Id.* at 7.
- ¹³⁰ See *id.*
- ¹³¹ *Id.* at 8.
- ¹³² See Amended Judgment at 1, *Porter*, *supra* note 127.
- ¹³³ See Judgment at 1, *Porter*, *supra* note 127.
- ¹³⁴ See, e.g., Sentencing Transcript at 41, *United States v. Backman*, 12-cr-00015 (N.M.I. July 16, 2014) (court rejecting the defendant's argument that because the local government (in Mariana Islands) had not determined that the victim had been trafficked, it could charge her with prostitution, and therefore she was not entitled to restitution).
- ¹³⁵ *United States v. Mammedov*, 304 F. App'x 922, 927 (2d Cir. 2008).
- ¹³⁶ *United States v. Cortes-Castro*, 511 F. App'x 942, 947 (2013).
- ¹³⁷ *United States v. Fu Sheng Kuo*, 620 F.3d 1158, 1164 (2010).
- ¹³⁸ See, e.g., Sentencing Transcript at 8-9, *United States v. Graham*, 1:12-cr-00311 (W.D.N.Y. Nov. 20, 2015), Sentencing Transcript at 124, *United States v. Carson*, *supra* note 30.
- ¹³⁹ 18 U.S.C. §3664(e).
- ¹⁴⁰ *United States v. Doe*, 488 F.3d 1154, 1159-60 (9th Cir. 2007).
- ¹⁴¹ Sentencing Transcript at 36, *United States v. Carson*, *supra* note 30.

¹⁴² Defendant’s Sentencing Memorandum at 5, *United States v. Graham*, 1:12-cr-00311 (W.D.N.Y. Sept. 29, 2015)

¹⁴³ See Judgment at 5, *United States v. Graham*, 1:12-cr-00311 (W.D.N.Y. Oct. 30, 2015).

¹⁴⁴ Attorney General’s Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons, Fiscal Year 2015, <https://www.justice.gov/humantrafficking/page/file/948601/download>.

¹⁴⁵ The Attorney General’s Report chart also includes multiple-defendant cases in which the restitution owed is joint and several between all of the defendants. The full restitution amount has been included just once in this calculation to eliminate the duplicate amounts.

¹⁴⁶ See *id.* at 142-143 (reproduced in Appendix C).

¹⁴⁷ See *id.*

¹⁴⁸ Attorney General’s Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons, Fiscal Year 2016, on file with the authors. The chart from the FY2016 report is reproduced in Appendix C.

¹⁴⁹ See 18 U.S.C. §1594(f)(1) (requiring the Attorney General to “transfer assets forfeited pursuant to this section, or the proceeds derived from the sale thereof, to satisfy victim restitution orders arising from violations of this chapter”).

¹⁵⁰ In *United States v. Gregory Gibson*, 5:15-cr-50043 (W.D. Ark. 2015), the court forfeited \$780 in cash, but did not order restitution. See Final Order of Forfeiture, *United States v. Gregory Gibson*, 5:15-cr-50043 (W.D. Ark. Jan. 28, 2016). In *United States v. William Gibson*, 3:13-cr-00695 (D.S.C. 2013), the court forfeited \$1,200 in cash, but failed to order restitution. See Preliminary Order of Forfeiture, *United States v. Gibson*, 3:13-cr-00695 (D.S.C. Mar. 12, 2014). In *United States v. Robinson*, 1:13-cr-00530 (D.Md. 2013), the court forfeited \$1,258 in cash, again without restitution. See Forfeiture Order, *United States v. Robinson*, 1:13-cr-00530 (D. Md. June 5, 2014), Judgment *United States v. Robinson*, 1:13-cr-00530 (D. Md. Aug. 28, 2014). And in *United States v. Tyson*, 5:13-cr-40090 (D. Kan. 2013), the court ordered forfeiture of unspecified amounts in gift cards, but failed to order restitution. Forfeiture, *United States v. Tyson*, 5:13-cr-40090 (D. Kan. Aug. 6, 2015).

¹⁵¹ Dep’t of Justice, Office of the Inspector General “Review of the Debt Collection Program of the United States Attorneys’ Offices,” (June 2015), <https://oig.justice.gov/reports/2015/e1506.pdf>.

¹⁵² *Id.* at 11.

¹⁵³ *Id.* at 26.

¹⁵⁴ See Indictment at 1, *United States v. Al Homoud*, 15-cr-00391 (W.D. Tex. June 3, 2015).

¹⁵⁵ See Complaint at 3, *United States v. Al Homoud*, 15-cr-00391 (W.D. Tex. June 1, 2015).

¹⁵⁶ See *id.*

¹⁵⁷ See *id.*

¹⁵⁸ See Dep’t of Justice Press Release “Qatar Military Official and Wife Plead Guilty to Federal Charges,” (Dec. 11, 2015).

¹⁵⁹ See Order to Accept Restitution Prior to Sentencing, *United States v. Al-Homoud*, 15-cr-00391 (W.D. Tex. Dec. 11, 2015).

¹⁶⁰ See Sentencing Transcript at 8, *United States v. Al-Homoud*, 15-cr-00391 (W.D. Tex. Feb. 10, 2016).

¹⁶¹ For an excellent discussion of restitution in trafficking cases, see William E. Nolan, “Mandatory Restitution: Complying with the Trafficking Victims Protection Act,” U.S. Attorneys Bulletin, Vol. 65, No. 6 (Nov. 2017), <https://www.justice.gov/usao/page/file/1008856/download>.

¹⁶² Attorney General’s Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons FY2015, p. 23, <https://www.justice.gov/humantrafficking/page/file/948601/download>.

¹⁶³ Restoration and remission, administrative processes designed to return money to victims, are often unfamiliar to anti-trafficking advocates. These administrative actions are well worth pursuing. According to data provided to OIG, “[MLARS, then known as AFMLS] approves the vast majority of restoration and remission requests it receives.” OIG Report, 29, n. 63.

¹⁶⁴ See Dep’t of Treasury https://fiscal.treasury.gov/fs-services/gov/debtColl/dms/top/debt_top.htm.

¹⁶⁵ See Office of Chief Counsel, Internal Revenue Service, Memorandum “The Use of the Treasury Offset Program to Collect Delinquent Restitution Payments,” (Apr. 26, 2010) https://www.irs.gov/pub/irao/pmta_2011-34.pdf.

¹⁶⁶ Restitution ordered under 18 U.S.C. §1593 is nontaxable as income. See Treasury Department, Internal Revenue Service, Notice 2012-12, “Restitution Payments under the Trafficking Victims Protection Act of 2000,” <https://www.irs.gov/pub/irs-drop/n-12-12.pdf>.

¹⁶⁷ Cases filed between 2009 and 2012 and closed on or before February 2, 2014.

¹⁶⁸ Cases filed after 2012 and closed on or before June 4, 2016, and cases filed between 2009 and 2012 and closed between February 2, 2014 and June 4, 2016.

Appendix A: Summary of Results

Data Set	2014 Data¹⁶⁷	2016 Data¹⁶⁸
Total Number of Cases Meeting Criteria for Inclusion in Report	Total: 186 Sex: 170 Labor / both: 16	Total: 324 Sex: 316 Labor / both: 8
Percentage of Cases in Which Restitution Was Ordered by Court	Total: 36% Sex: 31% Labor: 94%	Total: 27% Sex: 27% Labor: 50%
Percentage of Cases in Which Restitution Was Requested by Prosecutor (in any filing)	Total: 63% Sex: 61% Labor: 87%	Total: 67% Sex: 67% Labor: 50%
Percentage of Cases in Which Request Was Made by Prosecutor and Restitution Was Ordered by Court	Total: 51% Sex: 44% Labor: 93%	Total: 37% Sex: 36% Labor: 50%
Average Amount Awarded in Restitution	Total: \$60,639.84 Sex: \$46,211.66 Labor: \$213,939.21	Total: \$59,244.25 Sex: \$47,968.21 Labor: \$504,647.82
Number of Jurisdictions with at Least One Restitution Request in a Trafficking Case	36	58
Number of Jurisdictions with at Least One Restitution Order in a Trafficking Case	28	41

Appendix B: Full List of Cases

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
1	U.S. v. Abernathy et al.	2:14-cr-00009 (W.D.Pa.)	Sex	Both defendants pled guilty; sentenced to 120 months in prison; restitution not ordered.
2	U.S. v. Ahmad (Omar)	4:13-cr-00374 (N.D.Cal.)	Sex	Defendant pled guilty; sentenced to 63 months in prison; restitution ordered in the amount of \$4,000.
3	U.S. v. Alexander (Valerio) et al.	2:13-cr-00106 (S.D.Oh.)	Sex	Both defendants pled guilty; sentenced to 60 and 180 months in prison; restitution not ordered.
4	U.S. v. Andrade (Michael) et al.	1:13-cr-00430 (E.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 141 and 151 months in prison; restitution not ordered.
5	U.S. v. Andrade (Yanira)	1:13-cr-00069 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 132 months in prison; restitution not ordered.
6	U.S. v. Andres et al.	2:14-cr-1461 (D.Az.)	Labor	Both defendants pled guilty; sentenced to 11 and 40 months in prison; restitution not ordered.
7	U.S. v. Andry et al.	4:14-cr-00957 (D.Az.)	Sex	Two defendants pled guilty; sentenced to time served and 60 months in prison; one defendant dismissed (because she was later identified as a victim); restitution not ordered.
8	U.S. v. Ardrey	1:14-cr-00018 (D.R.I.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
9	U.S. v. Armstrong (Anthony)	3:13-cr-00041 (D.Or.)	Sex	Defendant pled guilty; sentenced to 200 months in prison; restitution not ordered.
10	U.S. v. Armstrong (Rodney) et al.	13-cr-20265 (W.D.Tenn.)	Sex	All 3 defendants pled guilty; sentenced to time served, 135, and 168 months; restitution not ordered.
11	U.S. v. Arrick et al.	2:14-cr-00108 (S.D.Oh.)	Sex	Both defendants pled guilty; sentenced to 120 and 162 months in prison; restitution not ordered.
12	U.S. v. Atkins (Ricky) et al.	1:14-cr-20895 (S.D.Fla.)	Sex	One defendant was convicted; one defendant pled guilty; sentenced to 136 and 380 months in prison; restitution ordered in the amount of \$600.
13	U.S. v. Avelenda	2:11-cr-00949 (C.D.Cal.)	Labor	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
14	U.S. v. Backman	1:12-cr-00015 (N.M.I.)	Sex	Defendant was convicted; sentenced to 235 months in prison; restitution ordered in the amount of \$9,570.
15	U.S. v. Barber	3:14-cr-00281 (S.D.Cal.)	Sex	Defendant pled guilty; sentenced to 72 months in prison; restitution not ordered.
16	U.S. v. Barclay et al.	7:13-cr-00269 (W.D.Tex.)	Sex	Both defendants pled guilty; sentenced to 97 and 121 months in prison; restitution not ordered (defendants ordered to pay \$15,000 fine).

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
17	U.S. v. Barcus	1:13-cr-00095 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 300 months in prison; restitution ordered in the amount of \$177,050.23 (joint and several with defendants in separate case).
18	U.S. v. Barefield	2:14-cr-00370 (S.D.Tex.)	Sex	Defendant pled guilty; sentenced to 24 months in prison; restitution not ordered.
19	U.S. v. Baston	13-cr-20914 (S.D.Fla.)	Sex	The defendant was convicted; sentenced to 300 months in prison; restitution was ordered in the amount of \$499,270. Original restitution amount was \$99,270.00, but was increased after appeal.
20	U.S. v. Becker (Joe)	4:13-cr-40094 (D.S.D.)	Sex	Defendant pled guilty; sentenced to 15 months in prison; restitution not ordered.
21	U.S. v. Becketts	2:13-cr-01637 (D.Az.)	Sex	Defendant pled guilty; sentenced to 96 months in prison; restitution not ordered.
22	U.S. v. Bell (Paul) et al.	5:12-cr-00057 (C.D.Cal.)	Sex	All eight defendants pled guilty; sentenced to 6-360 months in prison; restitution not ordered.
23	U.S. v. Benavidez	1:13-cr-00211 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
24	U.S. v. Berrios-Berrios	3:14-cr-00334 (D.P.R.)	Sex	Defendant pled guilty; sentenced to 132 months in prison; restitution not ordered.
25	U.S. v. Beverly (Damien) et al.	1:15-cr-00022 (D.R.I.)	Sex	Both defendants pled guilty; sentenced to 36 and 90 months in prison; restitution ordered in the amount of \$7,066.00 (\$3,533.00 per victim)
26	U.S. v. Bishop	4:14-cr-00546 (S.D.Tex.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
27	U.S. v. Blake (Dontavious) et al.	13-cr-80054 (S.D.Fla.)	Sex	Both Ds convicted; restitution not ordered (restitution proceeding cancelled because victims did not want to seek restitution).
28	U.S. v. Bland (Charles)	2:13-cr-00028 (D.Nev.)	Sex	Defendant pled guilty; sentenced to 80.5 months in prison; restitution not ordered.
29	U.S. v. Blue et al.	6:12-cr-06126 (W.D.N.Y.)	Sex	Both defendants pled guilty; sentenced to 72 and 108 months in prison; restitution not ordered.
30	U.S. v. Bluit	5:15-cr-00029 (W.D.La.)	Sex	Defendant pled guilty; sentenced to 178 months in prison; restitution not ordered.
31	U.S. v. Bo et al.	1:14-cr-00372 (E.D.N.Y.)	Sex	Both defendants pled guilty; sentenced to time served and 24 months in prison; restitution not ordered.
32	U.S. v. Bolds	3:11-cr-00697 (N.D.Cal.)	Sex	Defendant was convicted; sentenced to 160 months in prison; restitution not ordered; affirmed in part and reversed in part; resentenced to 140 months in prison; restitution not ordered.
33	U.S. v. Bonds (Nathan)	2:14-cr-00074 (W.D.Wash.)	Sex	Defendant was convicted; sentenced to 120 months in prison; restitution ordered in the amount of \$1,560 (to two victims).

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
34	U.S. v. Bonner, Jr. (Robert)	1:14-cr-00425 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution ordered in the amount of \$317,750.
35	U.S. v. Bowie et al.	1:14-cr-00121 (D.R.I.)	Sex	All three defendants pled guilty; sentenced to probation - 156 months in prison; restitution not ordered.
36	U.S. v. Boyd (Elfego) et al.	1:13-cr-00890 (S.D.N.Y.)	Sex	Both defendants pled guilty; sentenced to 60 and 120 months in prison; restitution ordered in the amount of \$20,000.
37	U.S. v. Bradford (Marquist)	2:12-cr-00126 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 126 months in prison; restitution not ordered.
38	U.S. v. Bramer (Nicole) et al.	0:13-cr-00049 (D.Minn.)	Sex	Both defendants pled guilty; sentenced to 20 and 121 months in prison; restitution ordered in the amount of \$6,180.
39	U.S. v. Brinson	4:13-cr-00004 (N.D.Okla.)	Sex	Defendant was convicted; sentenced to 204 months in prison; restitution ordered in the amount of \$740.
40	U.S. v. Broussard	5:13-cr-00690 (N.D.Cal.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution ordered in the amount of \$10,000 (\$5,000 per victim).
41	U.S. v. Brown (Daniel)	1:13-cr-00341 (N.D.Oh.)	Labor	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
42	U.S. v. Brown (Joseph)	13-cr-20468 (S.D.Fla.)	Sex	Defendant pled guilty; restitution not ordered.
43	U.S. v. Brown (Rajeanna)	3:14-cr-00276 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to time served; restitution not ordered.
44	U.S. v. Brown (Wellington) et al.	3:14-cr-00160 (D.Conn.)	Sex	Both defendants pled guilty; sentenced to 72 and 182 months in prison; restitution ordered in the amount of \$18,750.
45	U.S. v. Bryant (Christopher)	14-cr-00158 (W.D.Mich.)	Sex	Defendant was convicted; sentenced to 480 months in prison; restitution not ordered.
46	U.S. v. Burt	3:15-cr-00137 (N.D.Cal.)	Sex	Defendant pled guilty; sentenced to 127 months in prison; restitution not ordered.
47	U.S. v. Cade	3:13-cr-01076 (S.D.Cal.)	Sex	Defendant pled guilty; sentenced to 135 months in prison; restitution not ordered.
48	U.S. v. Callahan (Jordie) et al.	1:13-cr-00339 (N.D.Oh.)	Labor	Two defendants were convicted; one defendant pled guilty; sentenced to 45 - 384 months in prison; restitution not ordered.
49	U.S. v. Cantelmo (Sean)	3:14-cr-00217 (M.D.Pa.)	Sex	Defendant pled guilty; sentenced to 151 months in prison; restitution not ordered.
50	U.S. v. Canty	0:13-cr-00110 (D.Minn.)	Sex	Defendant was convicted; sentenced to 300 months in prison; restitution not ordered.
51	U.S. v. Carrasquillo-Penaloza	3:12-cr-00728 (D.P.R.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
52	U.S. v. Carson (McKenzie)	1:11-cr-00918 (N.D.Ill.)	Sex	Defendant was convicted; sentenced to 564 months in prison; restitution not ordered.
53	U.S. v. Carter (Alexis)	1:15-cr-00256 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution ordered in the amount of \$33,000 (to three victims).
54	U.S. v. Carter (Kavin)	8:14-cr-00416 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 192 months in prison; restitution not ordered.
55	U.S. v. Castillo (Charles) et al.	1:13-cr-00199 (S.D.Ga.)	Sex	All five defendants pled guilty; sentenced to 48-252 months in prison; restitution not ordered.
56	U.S. v. Castro (Herman)	2:15-cr-00011 (D.N.J.)	Sex	Defendant pled guilty; was sentenced to time served; restitution not ordered.
57	U.S. v. Chapman (Stephanie)	1:13-cr-00298 (E.D.Va.)	Sex	Defendant was convicted; sentenced to 132 months in prison; restitution not ordered.
58	U.S. v. Chin (Tedric)	13-cr-60218 (S.D.Fla.)	Sex	Defendant was convicted; restitution not ordered.
59	U.S. v. Cody	5:14-cr-00583 (E.D.Pa.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
60	U.S. v. Cole (Adrien)	1:13-cr-00053 (S.D.Iowa)	Sex	Defendant pled guilty; was sentenced to 120 months in prison; restitution not ordered.
61	U.S. v. Contreras	1:14-cr-00105 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
62	U.S. v. Cook (Ashlee)	6:15-cr-06046 (W.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 45 months in prison; restitution not ordered.
63	U.S. v. Cooley (Alan)	3:14-cr-00110 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 21 months in prison; restitution not ordered.
64	U.S. v. Corley	1:13-cr-00048 (S.D.N.Y.)	Sex	Defendant was convicted; sentenced to 120 months in prison; restitution not ordered.
65	U.S. v. Cortez-Granados	1:11-cr-00657 (E.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution ordered in the amount of \$145,815.
66	U.S. v. Coursey et al.	5:14-cr-00233 (W.D.Okla.)	Sex	Both defendants pled guilty; sentenced to 18 and 48 months in prison; restitution not ordered.
67	U.S. v. Cramer	6:12-cr-06112 (W.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
68	U.S. v. Crutchfield et al.	5:14-cr-00051 (N.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 57 and 60 months in prison; restitution ordered in the amount of \$4,000.
69	U.S. v. Culp	11-cr-20319 (W.D.Tenn.)	Sex	Defendant pled guilty; sentenced to 180 months; restitution ordered in the amount of \$4,500.
70	U.S. v. Cyprian	2:14-cr-00236 (W.D.Wash.)	Sex	Defendant pled guilty; sentenced to 92 months in prison; restitution ordered in the amount of \$172,000 (to two victims).

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
71	U.S. v. Daniels (Shannon)	3:12-cr-00630 (D.Or.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
72	U.S. v. Davall	3:14-cr-00097 (N.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 100 months in prison; restitution not ordered.
73	U.S. v. Davis (Joshua) et al.	2:13-cr-00589 (C.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 46 and 70 months in prison; restitution ordered in the amount of \$512 (from one defendant).
74	U.S. v. Davis (Martell)	3:13-cr-03149 (S.D.Cal.)	Sex	Defendant pled guilty; sentenced to 78 months in prison; restitution not ordered.
75	U.S. v. Davis (Ricky)	1:12-cr-00056 (E.D.Cal.)	Sex	Defendant was convicted; sentenced to 300 months in prison; restitution not ordered.
76	U.S. v. Davis (Terrianna)	8:14-cr-00431 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 57 months in prison; restitution not ordered.
77	U.S. v. Davis (Torrey)	2:14-cr-00076 (E.D.La.)	Sex	Defendant pled guilty; sentenced to 121 months in prison; restitution not ordered.
78	U.S. v. Dawkins	0:15-cr-60108 (S.D.Fla.)	Sex	Defendant pled guilty; restitution not ordered.
79	U.S. v. Dickerson et al.	8:14-cr-00179 (C.D.Cal.)	Sex	Defendant was convicted; sentenced to 180 months in prison; restitution not ordered.
80	U.S. v. Diggs	8:14-cr-00186 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 96 months in prison; restitution not ordered.
81	U.S. v. Douglas (Ladestro)	3:14-cr-00412 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution ordered in the amount of \$136,000.
82	U.S. v. Drayton	1:15-cr-00002 (M.D.N.C.)	Sex (charged as labor)	Defendant pled guilty; sentenced to 136 months in prison; restitution not ordered (previous case 1:14-cr-00387 - dismissed).
83	U.S. v. Driskill	3:13-cr-30179 (S.D.Ill.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution not ordered.
84	U.S. v. Drum	3:14-cr-00232 (W.D.N.C.)	Sex	Defendant pled guilty; sentenced to 188 months in prison; restitution not ordered.
85	U.S. v. Dumas (Quintavis) et al.	1:13-cr-00286 (E.D.Va.)	Sex	Both defendants convicted; sentenced to 120 months in prison; restitution ordered in the amount of \$17,572.47 (joint and several with defendant from another case).
86	U.S. v. Eddins et al.	13-cr-20203 (W.D.Tenn.)	Sex	Both defendants pled guilty; sentenced to 87 and 120 months; restitution ordered in the amount of \$2,422.48.
87	U.S. v. Elliott	1:15-cr-00010 (D. Utah)	Sex	Defendant pled guilty; sentenced to 74 months in prison; restitution ordered in the amount of \$1,704.69.
88	U.S. v. Eskridge (Clifton)	3:14-cr-05050 (W.D.Wash.)	Sex	Defendant pled guilty; sentenced to 100 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
89	U.S. v. Estrada-Tepal et al.	1:14-cr-00105 (E.D.N.Y.)	Sex	All four defendants pled guilty; sentenced to time served-210 months in prison; restitution ordered in the amount of \$1,033,336.00.
90	U.S. v. Farmer (John) et al.	1:14-cr-00110 (E.D.Tenn.)	Sex	Both defendants pled guilty; sentenced to 168 and 210 months; restitution not ordered.
91	U.S. v. Fields (Andrew)	8:13-cr-00198 (M.D.Fla.)	Sex	Defendant was convicted; sentenced to 405 months in prison; restitution not ordered.
92	U.S. v. Flavors	8:13-cr-00143 (C.D.Cal.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
93	U.S. v. Flores (Eric)	1:15-cr-00320 (E.D.Va.)	Sex	Defendant was convicted; sentenced to 300 months in prison; restitution ordered in the amount of \$40,370.
94	U.S. v. Flores-Mendez et al.	1:13-cr-00031 (S.D.N.Y.)	Sex	All defendants pled guilty; sentenced to time served - life in prison; restitution ordered in the amount of \$207,000.
95	U.S. v. Foote et al.	1:14-cr-00015 (D.Md.)	Sex	Both defendants pled guilty; sentenced to 144 months in prison; restitution not ordered.
96	U.S. v. Freeland	5:13-cr-00511 (W.D.Tex.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
97	U.S. v. Gallon	8:13-cr-00626 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 405 months in prison; restitution not ordered.
98	U.S. v. Garris	2:15-cr-00229 (D.N.J.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.
99	U.S. v. Gatson	5:14-cr-00358 (W.D.Okla.)	Sex	Defendant pled guilty; sentenced to 92 months in prison; restitution not ordered.
100	U.S. v. Geddes	0:14-cr-00394 (D.Minn.)	Sex	Defendant was convicted; sentenced to 282 months in prison; restitution not ordered.
101	U.S. v. Gemma	1:12-cr-10155 (D.Mass.)	Sex	Defendant was convicted; sentenced to 240 months in prison; restitution not ordered.
102	U.S. v. Gers	5:13-cr-00171 (W.D.Okla.)	Sex	Defendant pled guilty; sentenced to probation; restitution not ordered.
103	U.S. v. Gibson (Gregory)	5:15-cr-50043 (W.D.Ark.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.
104	U.S. v. Gibson (William) et al.	3:13-cr-00695 (D.S.C.)	Sex	All three defendants pled guilty; sentenced to 87-360 months in prison; restitution not ordered.
105	U.S. v. Gilliam	1:11-cr-01083 (S.D.N.Y.)	Sex	Defendant was convicted; sentenced to 240 months in prison; restitution ordered in the amount of \$2,100.
106	U.S. v. Glass (Anthony)	1:15-cr-00180 (S.D.Ind.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution not ordered.
107	U.S. v. Golson	4:14-cr-00503 (S.D.Tex.)	Sex	Defendant was convicted; sentenced to 60 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
108	U.S. v. Gonzalez (Samuel)	8:11-cr-00193 (C.D.Cal.)	Sex	Defendant pled guilty; sentenced to 63 months in prison; restitution not ordered.
109	U.S. v. Goswitz	15-cr-00251 (C.D.Cal.)	Sex	Defendant pled guilty; sentenced to 57 months in prison; restitution not ordered.
110	U.S. v. Graham (Christopher)	3:12-cr-00178 (D.Or.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$54,753.39 (\$45,000 to victim).
111	U.S. v. Graham (Darrell)	1:12-cr-10266 (D.Mass)	Sex	Defendant pled guilty; sentenced to 150 months in prison; restitution ordered in the amount of \$58,703.
112	U.S. v. Graham (Kenneth)	1:12-cr-00311 (W.D.N.Y.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$366,000 (specifically apportioned among three victims).
113	U.S. v. Grandberry et al.	13-cr-20007 (W.D.Tenn.)	Sex	4 defendants pled guilty; 1 defendant convicted; 1 defendant dismissed; sentences from time served - 235 months; restitution not ordered.
114	U.S. v. Grant et al.	4:15-cr-00024 (S.D.Ga.)	Sex	Both defendants pled guilty; sentenced to 156 months and life in prison; restitution not ordered.
115	U.S. v. Graves	4:14-cr-00235 (D.N.D.)	Sex	Defendant was convicted; sentenced to 405 months in prison; restitution not ordered. Affirmed on appeal.
116	U.S. v. Green (Nodia) et al.	13-cr-00006 (E.D.Ark.)	Sex	One defendant pled guilty, sentenced to 60 months in prison; two defendants were transferred to the Southern District of Texas; restitution not ordered.
117	U.S. v. Guidry	2:13-cr-00016 (E.D.Wis.)	Sex	Defendant pled guilty; sentenced to 299 months in prison; restitution not ordered. (Certain conditions of supervised release were vacated on appeal, but conviction and prison term were affirmed.)
118	U.S. v. Hall (Ronnie)	6:15-cr-00015 (M.D. Fla.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
119	U.S. v. Hardnett et al.	1:15-cr-20292 (S.D.Fla.)	Sex	Both defendants pled guilty; sentenced to 36 and 100 months in prison; restitution not ordered.
120	U.S. v. Harris (Don) et al.	4:12-cr-00154 (E.D.Ark.)	Sex	One defendant pled guilty, sentenced to time served; one defendant was convicted, sentenced to 120 months in prison; restitution not ordered.
121	U.S. v. Harris (Eric) et al.	3:14-cr-00046 (D.Nev.)	Sex	Both defendants pled guilty; sentenced to 90 and 108 months in prison; restitution not ordered.
122	U.S. v. Harris (Tevon)	4:13-cr-00165 (S.D.Tex.)	Sex	Defendant pled guilty; sentenced to 480 months in prison; restitution not ordered.
123	U.S. v. Haskins (Lenny)	1:14-cr-00432 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 480 months in prison; restitution ordered in the amount of \$538,250.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
124	U.S. v. Hawkins (Diamond)	2:14-cr-00098 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 84 months in prison; restitution not ordered.
125	U.S. v. Hayes (Derrick)	8:14-cr-00053 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
126	U.S. v. Heatly	3:14-cr-00067 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution not ordered.
127	U.S. v. Hernandez (Eleuterio) et al.	1:11-cr-00297 (E.D.N.Y.)	Sex	All six defendants pled guilty; sentenced to 22-264 months in prison; restitution ordered in the amount of \$3,060,135.96.
128	U.S. v. Hicks (Shanntaye)	2:13-cr-00190 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 292 months in prison; restitution not ordered.
129	U.S. v. Hill (Duane) et al.	12-cr-00431 (N.D.Oh.)	Sex	Both defendants pled guilty; sentenced to 200 and 224 months in prison; restitution ordered in the amount of \$240.
130	U.S. v. Hill (Joshua) et al.	1:12-cr-00285 (N.D.Ga.)	Sex	All three defendants pled guilty; sentenced to 78-215 months in prison; restitution ordered in the amount of \$4,000.
131	U.S. v. Hisle	3:14-cr-00044 (W.D.Ky.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution ordered in the amount of \$213,440.
132	U.S. v. Hodza et al.	3:15-cr-00032 (E.D.Va.)	Sex	Both defendants pled guilty; sentenced to 420 and 500 months in prison; restitution ordered in the amount of \$20,618.22.
133	U.S. v. Holmes (Ronnie)	1:13-cr-00278 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
134	U.S. v. Al-Homoud et al.	5:15-cr-00391 (W.D.Tex.)	Labor	Both defendants pled guilty; sentenced to probation; restitution ordered in the amount of \$120,000 (joint and several).
135	U.S. v. Hubert et al.	1:13-cr-00595 (D.Md.)	Sex	Both defendants pled guilty; sentenced to 30 and 168 months in prison; restitution not ordered.
136	U.S. v. Hudson (Vincent) et al.	6:14-cr-00078 (M.D.Fla.)	Sex	All three defendants pled guilty; sentenced to probation - 360 months in prison; restitution not ordered.
137	U.S. v. Huey-Dingle	2:13-cr-00135 (N.D.Ind.)	Sex	Defendant pled guilty; sentenced to 540 months in prison; restitution ordered in the amount of \$78,721.11 (\$13,119.75 to deceased victim's estate; \$65,601.36 to insurance company).
138	U.S. v. Hull (Cameron)	1:13-cr-00216 (N.D.Ill.)	Sex	Defendant pled guilty; sentenced to 121 months in prison; restitution ordered in the amount of \$400.
139	U.S. v. Hunt (Maurice)	1:13-cr-00189 (E.D.Cal.)	Sex	Defendant was convicted; sentenced to 600 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
140	U.S. v. Irby	1:13-cr-00064 (N.D.Ga.)	Sex	Defendant pled guilty; sentenced to 57 months in prison; restitution ordered in the amount of \$250 (earlier case 1:12-cr-00355 (N.D.Ga.) was dismissed by government motion because defendant pled guilty in this case).
141	U.S. v. Jackson (Brady)	3:12-cr-00273 (N.D.Oh.)	Sex	Defendant was convicted; sentenced to 180 months in prison; restitution ordered in the amount of \$13,000.
142	U.S. v. Jackson (Douglas)	3:15-cr-00006 (N.D.Ind.)	Sex	Defendant was convicted; sentenced to 295 months in prison; restitution not ordered.
143	U.S. v. Jackson (Eddie)	1:13-cr-00246 (W.D.Mich.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution not ordered.
144	U.S. v. Jackson (Jerel)	2:13-cr-00622 (E.D.Pa.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
145	U.S. v. Jackson (Jordan) et al.	3:13-cr-00363 (N.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 18 and 50 months in prison; restitution not ordered.
146	U.S. v. Jackson (Justin)	2:11-cr-00477 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 135 months in prison; restitution not ordered.
147	U.S. v. Jackson (Ralph)	2:13-cr-00476 (C.D.Cal.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
148	U.S. v. Jackson (Robert)	1:13-cr-00063 (N.D.Iowa)	Sex	Defendant pled guilty; sentenced to life in prison; restitution not ordered.
149	U.S. v. Jackson (Taurean) et al.	2:13-cr-00279 (E.D.La.)	Sex	Both defendants pled guilty; sentenced to time served and 270 months in prison; restitution ordered in the amount of \$1,750.
150	U.S. v. Jackson (Todd)	2:13-cr-00163 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
151	U.S. v. Jenkins (David) et al.	3:12-cr-00513 (D.S.C.)	Sex	38 defendants pled guilty; one defendant convicted; sentenced to between time served and life; restitution not ordered to trafficking victims (to IRS only for filing false tax returns).
152	U.S. v. Jeter	1:13-cr-00286 (M.D.N.C.)	Sex	Defendant pled guilty; sentenced to 14 months in prison; restitution not ordered.
153	U.S. v. Johnson (Amber)	15-cr-00141 (E.D.Ark.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.
154	U.S. v. Johnson (Dereck)	3:13-cr-00230 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution not ordered.
155	U.S. v. Johnson (Pierre) et al.	4:14-cr-00092 (S.D.Tex.)	Sex	Both defendants pled guilty; both sentenced to 168 months; restitution not ordered.
156	U.S. v. Johnson (William Vontrail)	5:14-cr-00341 (W.D.Okla.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution ordered in the amount of \$900,000.
157	U.S. v. Jones (Keosha)	8:13-cr-00442 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to time served; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
158	U.S. v. Kalu et al.	1:12-cr-00106 (D.Colo.)	Labor	One defendant was convicted; sentenced to 130 months in prison; one defendant pled guilty; sentenced to probation; restitution ordered in the amount of \$3,790,338.55 (joint and several; specifically apportioned among 16 victims)
159	U.S. v. Keith (Justin)	4:15-cr-40090 (D.S.D.)	Sex	Defendant pled guilty; sentenced to 51 months in prison; restitution not ordered.
160	U.S. v. Kelly (Johnathon)	1:13-cr-00108 (N.D.Ga.)	Sex	Defendant pled guilty; sentenced to 132 months in prison; restitution ordered in the amount of \$7,500.
161	U.S. v. Keys (Donniel) et al.	1:14-cr-20135 (S.D.Fla.)	Sex	Defendant pled guilty; sentenced to 220 months in prison; restitution not ordered. Affirmed on appeal.
162	U.S. v. Kidd	6:13-cr-00028 (D.Or.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.
163	U.S. v. Kidgell et al.	6:13-cr-10129 (D.Kan.)	Sex	All three defendants pled guilty; sentenced to time served - 60 months in prison; restitution not ordered.
164	U.S. v. Kimble et al.	4:13-cr-00319 (E.D.Ark.)	Sex	Both defendants pled guilty; sentenced to 90 months in prison; restitution not ordered.
165	U.S. v. King (Deshawn) et al.	5:13-cr-00417 (E.D.Pa.)	Sex	Both defendants pled guilty; sentenced to 140 and 193 months in prison; restitution not ordered.
166	U.S. v. Kirby (Tremayne)	7:15-cr-00026 (W.D.Va.)	Sex	Defendant pled guilty; restitution ordered in the amount of \$11,556.33.
167	U.S. v. Klinger	1:14-cr-00233 (M.D.Pa.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
168	U.S. v. Knight (Dana)	2:15-cr-00026 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution not ordered.
169	U.S. v. Lambden et al.	3:13-cr-00294 (D.Or.)	Sex	Defendant pled guilty; sentenced to 48 months in prison; restitution not ordered.
170	U.S. v. Lee (Michael) et al.	1:13-cr-00678 (D.Md.)	Sex	Both defendants pled guilty; sentenced to 46 and 156 months in prison; restitution not ordered.
171	U.S. v. Lendon	3:12-cr-00166 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution ordered in the amount of \$100.
172	U.S. v. Lewis (Jesse)	14-cr-60080 (S.D.Fla.)	Sex	Defendant was convicted; restitution not ordered.
173	U.S. v. Lewis (Naba)	8:13-cr-00591 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 180 months in prison; restitution not ordered.
174	U.S. v. Lockhart (Deion) et al.	3:13-cr-01832 (W.D.Tex.)	Sex	Four defendants were convicted; two defendants pled guilty; sentenced to 60 months - life in prison; restitution not ordered.
175	U.S. v. Lopez-Perez et al.	1:11-cr-00199 (E.D.N.Y.)	Sex	All three defendants pled guilty; sentenced to 121 to 216 months in prison; restitution ordered in the amount of \$1,239,665.
176	U.S. v. Love (Percy)	2:13-cr-00306 (E.D.Cal.)	Sex	Defendant was convicted; sentenced to 420 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
177	U.S. v. Lustig	3:13-cr-3921 (S.D.Cal.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
178	U.S. v. Luu	3:11-cr-00246 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution ordered in the amount of \$16,767.
179	U.S. v. Mack (Jeremy) et al.	1:13-cr-00278 (N.D.Oh)	Sex	One defendant pled guilty; one defendant was convicted; sentenced to 30 months and life in prison; restitution not ordered.
180	U.S. v. Manago	2:14-cr-00023 (W.D.Wash.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution ordered in the amount of \$100,000 (split evenly between two victims)
181	U.S. v. Matlock et al.	12-cr-20213 (W.D.Tenn.)	Sex	All 3 defendants pled guilty; sentenced to time served, 36, and 168 months; restitution not ordered.
182	U.S. v. Mavour	13-cr-60226 (S.D.Fla.)	Sex	Defendant pled guilty; restitution not ordered.
183	U.S. v. Mayham	8:14-cr-00221 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 235 months in prison; restitution not ordered.
184	U.S. v. McCormick	3:14-cr-00069 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to probation; restitution not ordered.
185	U.S. v. McCullum (Vernon) et al.	3:13-cr-00012 (D.Nev.)	Sex	All three defendants pled guilty; sentenced to time served - 168 months in prison; restitution not ordered.
186	U.S. v. McHenry (Dontre)	0:14-cr-00203 (D.Minn.)	Sex	Defendant pled guilty; sentenced to 292 months in prison; restitution not ordered.
187	U.S. v. McIntyre (Rahim)	2:13-cr-00361 (E.D.Pa.)	Sex	Defendant was convicted; sentenced to 262 months in prison; restitution ordered in the amount of \$15,600 (to three victims).
188	U.S. v. McIntyre (Rashaad)	2:12-cr-00675 (E.D.Pa.)	Sex	Defendant pled guilty; sentenced to 264 months in prison; restitution ordered in the amount of \$125,600.
189	U.S. v. McKinley (Shaun)	14-cr-60163 (S.D.Fla.)	Sex	Defendant was convicted; restitution ordered in the amount of \$4,121.
190	U.S. v. McLemore (Trenton)	3:14-cr-00258 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 252 months in prison; restitution not ordered.
191	U.S. v. McMillian (Tyrone)	2:11-cr-193 (E.D.Wis.)	Sex	Defendant was convicted; sentenced to 180 months in prison; restitution not ordered. (<i>n.b.</i> original sentence was for 360 months in prison, but was vacated and remanded.)
192	U.S. v. McMurray (Keith)	3:12-cr-00360 (D.Or.)	Sex	Defendant pled guilty; sentenced to 204 months in prison; restitution not ordered.
193	U.S. v. McNeal (Brandon)	6:16-cr-06011 (W.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 108 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
194	U.S. v. Medeles-Arguello et al.	4:13-cr-00628 (S.D.Tex.)	Sex	13 defendants pled guilty; one defendant was convicted; one defendant is fugitive; sentenced to 18 months – life in prison; restitution ordered in the amount of \$1,494,929.10 (originally \$840,289.10) (joint and several).
195	U.S. v. Mendez (Ismael)	1:15-cr-00349 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
196	U.S. v. Mendez (Javier) et al.	14-cr-00040 (E.D.Va.)	Sex	Both defendants pled guilty; sentenced to 36 and 210 months in prison; restitution not ordered.
197	U.S. v. Mendez-Hernandez et al.	4:13-cr-00004 (S.D.Ga.)	Sex	Various outcomes among 24 defendants; sentenced to 7 months - life in prison; restitution ordered in the amount of \$705,000.
198	U.S. v. Miguel (Charles) et al.	3:14-cr-00110 (D.Or.)	Sex	Two defendants pled guilty; sentenced to probation and 120 months in prison; restitution not ordered; one defendant dismissed.
199	U.S. v. Miller (Raymond)	2:15-cr-00153 (E.D.Wis.)	Sex	Defendant pled guilty; sentenced to 102 months in prison; restitution not ordered.
200	U.S. v. Miller (Reginald)	4:14-cr-00409 (D.S.C.)	Labor	Defendant pled guilty; sentenced to time served; restitution ordered in the amount of \$75,000 (to 16 victims; specifically apportioned).
201	U.S. v. Miller (Ruth)	1:13-cr-00175 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 84 months in prison; restitution ordered in the amount of \$341,437.50.
202	U.S. v. Miller (Seagram) et al.	2:13-cr-00184 (D.Nev.)	Sex	Both defendants pled guilty; sentenced to 96 months in prison; restitution not ordered.
203	U.S. v. Miller (William)	2:12-cr-00179 (W.D.Pa.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.
204	U.S. v. Minasian et al.	1:13-cr-10099 (D.Mass.)	Sex	Both defendants pled guilty; sentenced to time served and 180 months in prison; restitution ordered in the amount of \$4,000.
205	U.S. v. Miranda (Derek)	1:15-cr-10196 (D.Mass.)	Sex	Defendant pled guilty; sentenced to 57 months in prison; restitution not ordered.
206	U.S. v. Misher et al.	1:14-cr-00107 (N.D.Ill.)	Sex	Both defendants pled guilty; sentenced to 40 and 120 months in prison; restitution not ordered.
207	U.S. v. Mitchell (Jerry)	1:13-cr-00262 (S.D.Ind.)	Sex	Defendant pled guilty; sentenced to 300 months in prison; restitution ordered in the amount of \$53,600 (to three victims).
208	U.S. v. Mitchell (Qualyn)	5:14-cr-00062 (W.D.La.)	Sex	Defendant pled guilty; sentenced to 170 months in prison; restitution not ordered.
209	U.S. v. Moore (Alvin)	2:15-cr-00052 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 188 months in prison; restitution not ordered.
210	U.S. v. Morris (Brittany)	2:14-cr-20061 (D.Kan.)	Sex	Defendant pled guilty; sentenced to 1 month in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
211	U.S. v. Murray (Fabian) et al.	1:12-cr-00286 (N.D.Ga.)	Sex	All three defendants pled guilty; sentenced to 70-172 months in prison; restitution ordered in the amount of \$1,000.
212	U.S. v. Murray (Jamil)	2:12-cr-00585 (E.D.Pa.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution not ordered.
213	U.S. v. Muslim	3:13-cr-00307 (W.D.N.C.)	Sex	Defendant was convicted; sentenced to life in prison; restitution ordered in the amount of \$13,840.
214	U.S. v. Nabors	3:13-cr-00560 (D.Or.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
215	U.S. v. Nance (David) et al.	4:14-cr-40114 (D.S.D.)	Sex	Both defendants pled guilty; sentenced to time served and 37 months in prison; restitution not ordered.
216	U.S. v. Nartey	6:15-cr-06106 (W.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 96 months in prison; restitution not ordered.
217	U.S. v. Natal-Bracetti	3:14-cr-00245 (D.P.R.)	Sex	Defendant pled guilty; sentenced to 293 months in prison; restitution not ordered.
218	U.S. v. Nauta	8:14-cr-00146 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
219	U.S. v. Navarrete (Carlos)	3:13-cr-00071 (D.Nev.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
220	U.S. v. Navarro-Rodriguez	3:13-cr-00740 (D.P.R.)	Sex	Defendant pled guilty; sentenced to 188 months in prison; restitution not ordered.
221	U.S. v. Newsome (Deondrea)	1:13-cr-00187 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
222	U.S. v. Nunley et al.	4:14-cr-00956 (D.Az.)	Sex	Both defendants pled guilty; sentenced to 24 and 60 months in prison; restitution not ordered.
223	U.S. v. Nunnely et al.	2:13-cr-00309 (E.D.Cal.)	Sex	All three defendants pled guilty; sentenced to time served - 125 months in prison; restitution not ordered.
224	U.S. v. OBannon	2:14-cr-01530 (D.Az.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
225	U.S. v. Parker (Deandre)	2:14-cr-00372 (D.Nev.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
226	U.S. v. Parker (Troy)	3:13-cr-00213 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 188 months in prison; restitution not ordered.
227	U.S. v. Patton et al.	3:13-cr-00321 (N.D.Tex.)	Sex	Both defendants pled guilty; sentenced to 87 and 262 months in prison; restitution not ordered.
228	U.S. v. Pledger et al.	1:14-cr-10036 (D.Mass.)	Sex	Both defendants pled guilty; sentenced to 153 and 180 months in prison; restitution not ordered.
229	U.S. v. Porter (Antonio)	3:12-cr-00643 (D.Or.)	Sex	Defendant pled guilty; sentenced to 144 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
230	U.S. v. Porter (Roshawn) et al.	8:12-cr-00097 (C.D.Cal.)	Both	Both defendants pled guilty; sentenced to 78 and 120 months in prison; restitution ordered in the amount of \$866,244.68.
231	U.S. v. Powell (Tryvell)	1:14-cr-00125 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 130 months in prison; restitution not ordered.
232	U.S. v. Price (William)	13-cr-20836 (S.D.Fla.)	Sex	Defendant pled guilty; sentenced to 148 months in prison; restitution ordered in the amount of \$8,250.
233	U.S. v. Ragsdale (Xzavion)	2:15-cr-00072 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
234	U.S. v. Ramirez (Valdemar)	1:13-cr-00404 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 36 months in prison; restitution not ordered.
235	U.S. v. Randall (Michael)	1:15-cr-00039 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 300 months in prison; restitution ordered in the amount of \$645,890.
236	U.S. v. Randle (Troy)	2:14-cr-00045 (E.D.Wis.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution not ordered.
237	U.S. v. Randolph (Narada)	3:13-cr-00128 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 292 months in prison; restitution not ordered.
238	U.S. v. Rea	4:15-cr-01531 (D.Az.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
239	U.S. v. Reid (Arthur)	5:13-cr-00060 (M.D.Ga.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
240	U.S. v. Reineke et al.	5:13-cr-00025 (W.D.Okla.)	Sex	Defendant pled guilty; sentenced to 46 months in prison; restitution not ordered.
241	U.S. v. Reyling	3:14-cr-00052 (M.D.Fla.)	Sex	Defendant pled guilty; sentenced to 24 months in prison; restitution not ordered.
242	U.S. v. Richards (Ira)	1:13-cr-00818 (S.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution ordered in the amount of \$22,500.
243	U.S. v. Richardson (Justin) et al.	1:14-cr-10179 (D.Mass.)	Sex	All three defendants pled guilty; sentenced to 71-138 months in prison; restitution not ordered.
244	U.S. v. Richmond (Tyrell)	1:14-cr-00171 (E.D.Cal.)	Sex	Defendant pled guilty; sentenced to 151 months in prison; restitution not ordered.
245	U.S. v. Rivera (Luis) et al.	3:15-cr-00051 (N.D.Tex.)	Sex	One defendant pled guilty; one defendant convicted; sentenced to 293 months in prison; restitution not ordered.
246	U.S. v. Roberts (Thomas)	4:13-cr-40137 (D.S.D.)	Sex	Defendant pled guilty; sentenced to 63 months in prison; restitution not ordered.
247	U.S. v. Robinson (Brandon Ace) et al.	13-cr-60284 (S.D.Fla.)	Sex	6 defendants pled guilty; 1 defendant dismissed; sentenced to between 36 and 360 months in prison; restitution ordered in the amount of \$14,000 (joint and several among 4 defendants, with 1 defendant paying less). Affirmed on appeal.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
248	U.S. v. Robinson (Jermaine) et al.	1:13-cr-00054 (S.D. Iowa)	Sex	Both defendants pled guilty; sentenced to 60 and 120 months in prison; restitution not ordered.
249	U.S. v. Robinson (Kenneth) et al.	1:13-cr-00530 (D.Md.)	Sex	All 5 defendants pled guilty; sentenced to 12 - 144 months in prison; restitution not ordered.
250	U.S. v. Robinson (Kerry)	4:13-cr-00110 (N.D.Tex.)	Sex	Defendant pled guilty; sentenced to 46 months in prison; restitution not ordered.
251	U.S. v. Rodriguez (Joe)	2:14-cr-00093 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
252	U.S. v. Roy (Jean Claude) et al.	8:13-cr-00249 (D.Md.)	Sex	One defendant was convicted; one defendant pled guilty; sentenced to 240 months in prison and time served; restitution not ordered.
253	U.S. v. Roy (Jermaine)	4:13-cr-00010 (E.D.Ark.)	Sex	Defendant was convicted; sentenced to 180 months in prison; restitution not ordered.
254	U.S. v. Ruseckaite (Giedre)	1:15-cr-00157 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution ordered in the amount of \$4,000.
255	U.S. v. Salaam	3:14-cr-00072 (M.D. Fla.)	Sex	Defendant pled guilty; sentenced to 100 months in prison; restitution not ordered.
256	U.S. v. Salankole (Abiodu)	2:15-cr-00393 (D.Utah)	Sex	Defendant pled guilty; sentenced to 48 months in prison; restitution ordered in the amount of \$500.
257	U.S. v. Scott (Jeremy)	4:12-cr-00433 (S.D.Tex.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
258	U.S. v. Scott (Kawaum) et al.	5:13-cr-00116 (C.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 150 and 200 months in prison; restitution not ordered.
259	U.S. v. Sea	14-cr-10080 (W.D.Tenn.)	Sex	Defendant pled guilty; sentenced to 120 months; restitution not ordered.
260	U.S. v. Sewell et al.	5:10-cr-00731 (E.D.Pa.)	Sex	Both defendants pled guilty; one defendant sentenced to 360 months in prison; restitution ordered in the amount of \$52,000 (to five victims) (other defendant's judgment under seal).
261	U.S. v. Shulman (Christian)	2:15-cr-20004 (E.D. Mich.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution not ordered.
262	U.S. v. Sibley	2:14-cr-00196 (S.D.Oh.)	Sex	Defendant was convicted; sentenced to 330 months in prison; restitution not ordered.
263	U.S. v. Simmons (Jamar) et al.	1:13-cr-00061 (D.Md.)	Sex	Both defendants pled guilty; sentenced to 140 and 180 months in prison; restitution not ordered.
264	U.S. v. Simpson (Isaiah) et al.	3:13-cr-00423 (D.Or.)	Sex	Both defendants pled guilty; sentenced to time served and 120 months in prison; restitution not ordered.
265	U.S. v. Singletary	14-cr-20604 (S.D.Fla.)	Sex	Defendant pled guilty; sentenced to 126 months in prison; restitution not ordered.
266	U.S. v. Smith (Carl Brandon)	1:12-cr-00246 (N.D.Ill.)	Sex	Defendant pled guilty; sentenced to 360 months in prison; restitution ordered in the amount of \$239,063

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
267	U.S. v. Smith (Carl Robert) et al.	2:14-cr-00176 (S.D.Oh.)	Sex	All defendants pled guilty; sentenced to probation - 120 months in prison; restitution not ordered.
268	U.S. v. Smith (Devin Edward)	5:14-cr-20303 (E.D.Mich.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$173,500 (to two victims).
269	U.S. v. Smith (Enoch)	2:12-cr-00473 (E.D.Pa.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$190,400.
270	U.S. v. Smith (Eric Demetrius) et al.	4:13-cr-00315 (N.D.Cal.)	Sex	One defendant pled guilty; sentenced to 70 months in prison; restitution not ordered; second defendant dismissed under diversion agreement.
271	U.S. v. Smith (James)	2:13-cr-00383 (D.N.J.)	Both	Defendant pled guilty; sentenced to 51 months in prison; restitution ordered in the amount of \$1,000.
272	U.S. v. Smith (Joshua)	4:13-cr-00286 (W.D.Mo.)	Sex	Defendant pled guilty; sentenced to 240 months in prison; restitution ordered in the amount of \$23,406.
273	U.S. v. Smith (Nathaniel) et al.	4:14-cr-00121 (E.D.Ark.)	Sex	Both defendants pled guilty; sentenced to 120 and 24 months in prison; restitution not ordered.
274	U.S. v. Smith (Terrell)	1:14-cr-00183 (D.Colo.)	Sex	Defendant pled guilty; sentenced to 151 months in prison; restitution not ordered.
275	U.S. v. Smith (Tyrone)	1:15-cr-00135 (W.D.Mich.)	Sex	Defendant pled guilty; sentenced to 420 months in prison; restitution ordered in the amount of \$20,000
276	U.S. v. Snow (Thaddaeus) et al.	13-cr-00350 (E.D.Va.)	Sex	22 defendants pled guilty; 2 defendants convicted; restitution ordered in the amount of \$1,127.16 (joint and several from 3 defendants)
277	U.S. v. Soda et al.	3:15-cr-00278 (S.D.Cal.)	Sex	Both defendants pled guilty; sentenced to 72 and 92 months in prison; restitution not ordered.
278	U.S. v. Spivey et al.	4:13-cr-00174 (N.D.Okla.)	Sex	Both defendants pled guilty; sentenced to 60 and 120 months in prison; restitution not ordered.
279	U.S. v. Stephens (Antonio)	3:14-cr-00044 (D.Or.)	Sex	Defendant pled guilty; sentenced to 87 months in prison; restitution not ordered.
280	U.S. v. Swinney	1:13-cr-00422 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 294 months in prison; restitution ordered in the amount of \$540,622.
281	U.S. v. Tanner, Jr.	3:13-cr-00285 (D.Or.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
282	U.S. v. Taplin	3:13-cr-00266 (D.Or.)	Sex	Defendant pled guilty; sentenced to time served; restitution not ordered.
283	U.S. v. Thomas (Edward) et al.	3:14-cr-00031 (D.Conn.)	Sex	One defendant was convicted; one defendant pled guilty; sentenced to 60 and 210 months in prison; restitution ordered in the amount of \$28,700.
284	U.S. v. Thomas (Larry)	3:12-cr-04832 (S.D.Cal.)	Sex	Defendant pled guilty; sentenced to time served; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
285	U.S. v. Thompson (James)	5:15-cr-00230 (N.D.Oh.)	Sex	Defendant pled guilty; sentenced to 100 months in prison; restitution not ordered.
286	U.S. v. Thompson (Steven) et al.	1:13-cr-00187 (N.D.Ga.)	Sex	One defendant pled guilty; one defendant convicted; sentenced to 96 and 240 months in prison; restitution ordered in the amount of \$12,000.
287	U.S. v. Tier (David) et al.	0:13-cr-60236 (S.D.Fla.)	Sex	Both defendants pled guilty; sentenced to 60 and 180 months in prison; restitution ordered in the amount of \$4,000.
288	U.S. v. Tilden (Edward)	3:14-cr-00196 (N.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 200 months in prison; restitution not ordered.
289	U.S. v. Tilden (Lynette)	3:14-cr-00119 (N.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 160 months in prison; restitution not ordered.
290	U.S. v. Tinsley	1:13-cr-00476 (D.Md.)	Sex	Defendant pled guilty; sentenced to 132 months in prison; restitution not ordered.
291	U.S. v. Torrellas	2:12-cr-00447 (D.N.J.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
292	U.S. v. Tran	0:14-cr-00025 (D.Minn.)	Labor	Defendant pled guilty; sentenced to 12 months in prison; restitution ordered in the amount of \$51,844.
293	U.S. v. Traylor et al.	11-cr-1448 (S.D.Cal.)	Sex	39 defendants - 35 pled guilty to RICO; 3 dismissed; one killed as a fugitive; defendants sentenced 12 months - 153 months in prison; restitution not ordered.
294	U.S. v. Tucker (Letha)	2:13-cr-00078 (C.D.Cal.)	Sex	Defendant pled guilty; sentenced to 72 months in prison; restitution not ordered.
295	U.S. v. Tyson (Ariana)	15-cr-60174 (S.D.Fla.)	Sex	Defendant pled guilty; sentenced to 24 months in prison; restitution not ordered.
296	U.S. v. Tyson (Dominique)	5:13-cr-40090 (D.Kan.)	Sex	Defendant pled guilty; sentenced to 168 months in prison; restitution not ordered.
297	U.S. v. Vanderhorst	2:13-cr-00294 (D.S.C.)	Sex	Defendant pled guilty; sentenced to 57 months in prison; restitution not ordered.
298	U.S. v. Vargas (Blasina) et al.	4:14-cr-00387 (S.D.Tex.)	Sex	One defendant convicted; three defendants pled guilty; sentenced to 60 - 120 months in prison; restitution not ordered.
299	U.S. v. Villanueva et al.	6:14-cr-00096 (M.D.Fla.)	Sex	Three defendants were convicted; one defendant pled guilty; sentenced to 100-235 months in prison; restitution not ordered.
300	U.S. v. Wade (Emanuel) et al.	4:14-cr-00097 (S.D.Tex.)	Sex	All five defendants pled guilty; sentenced to home confinement - 360 months in prison; restitution not ordered.
301	U.S. v. Walker (Jerome) et al.	3:14-cr-00560 (D.S.C.)	Sex	Both defendants pled guilty; sentenced to time served and 84 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
302	U.S. v. Walls (Alexander) et al.	3:11-cr-05408 (W.D.Wash.)	Sex	One defendant was convicted; one defendant pled guilty; sentenced to 176 and 208 months in prison; restitution ordered in the amount of \$208,588.08 (most of it joint and several).
303	U.S. v. Wardlow (Tony) et al.	4:13-cr-00083 (W.D.Mo.)	Sex	One defendant was convicted; one defendant pled guilty; sentenced to probation and 250 months in prison; restitution ordered in the amount of \$292.
304	U.S. v. Wearing	3:14-cr-00122 (W.D.Wis.)	Sex	Defendant was convicted (bench trial); sentenced to 180 months in prison; restitution not ordered.
305	U.S. v. Weeks	1:14-cr-00313 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 132 months in prison; restitution ordered in the amount of \$15,000.
306	U.S. v. Weise	13-cr-20092 (S.D.Fla.)	Sex	The defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$13,000. Affirmed on appeal.
307	U.S. v. Wells (Doncouri) et al.	5:14-cr-50047 (W.D.Ark.)	Sex	Both defendants pled guilty; sentenced to 300 and 24 months in prison; restitution not ordered.
308	U.S. v. West (Marques) et al.	4:13-cr-01493 (D.Az.)	Sex (includes labor charge as well)	Both defendants pled guilty; sentenced to probation and 160 months in prison; restitution ordered in the amount of \$425 (joint and several).
309	U.S. v. White (Alyssa)	1:13-cr-00191 (N.D.Okla.)	Sex	Defendant pled guilty; sentenced to probation; restitution not ordered.
310	U.S. v. White (Christopher)	3:14-cr-00216 (D.Or.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
311	U.S. v. White (Jonathan)	1:13-cr-00630 (E.D.N.Y.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
312	U.S. v. Wilcox	4:12-cr-01338 (D.Az.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution ordered in the amount of \$200.
313	U.S. v. Williams (Christopher)	5:13-cr-00123 (E.D.N.C.)	Sex	Defendant pled guilty; sentenced to 540 months in prison; restitution not ordered.
314	U.S. v. Williams (Jathar)	4:14-cr-00012 (W.D.Ky.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
315	U.S. v. Williams (Justin)	2:13-cr-00014 (E.D.Pa.)	Sex	Defendant was convicted; sentenced to 360 months in prison; restitution ordered in the amount of \$129,500.
316	U.S. v. Williams (Reginald)	4:12-cr-00369 (E.D.Mo.)	Sex	Defendant was convicted; sentenced to 240 months in prison; restitution not ordered.
317	U.S. v. Willis (Otis) et al.	6:13-cr-6013 (W.D.N.Y.)	Sex	Both defendants pled guilty; sentenced to time served and 41 months in prison; restitution not ordered.
318	U.S. v. Wilson (Melvin)	4:14-cr-00178 (E.D.Mo.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.
319	U.S. v. Winston (Darnell)	2:15-cr-20020 (W.D.Ark.)	Sex	Defendant pled guilty; sentenced to 120 months in prison; restitution not ordered.

	Case Name	Docket number and jurisdiction	Type: Sex/Labor/Both	Outcome
320	U.S. v. Womack et al.	2:13-cr-00206 (E.D.Pa.)	Sex	Both defendants pled guilty; sentenced to 185 months and life in prison; restitution ordered in the amount of \$35,700.
321	U.S. v. Wren (Drayon)	2:15-cr-00007 (E.D.Wis.)	Sex	Defendant pled guilty; sentenced to 216 months in prison; restitution not ordered.
322	U.S. v. Wright (Jeffrey)	2:14-cr-00068 (E.D.Va.)	Sex	Defendant pled guilty; sentenced to 60 months in prison; restitution not ordered.
323	U.S. v. Wright (Marcus) et al.	5:13-cr-00806 (W.D.Tex.)	Sex	Three defendants were convicted; one defendant pled guilty; sentenced to 6 months - life in prison; restitution ordered in the amount of \$1,500 (from three defendants).
324	U.S. v. Wright (Robin)	2:15-cr-00079 (E.D.Wis.)	Sex	Defendant pled guilty; sentenced to time served; restitution not ordered.

Appendix C

Source: The Attorney General's Annual Reports to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons for FY2015 and FY2016

The Attorney General's Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons for FY2015, Appendix C, pp. 142-143

Appendix C: Restitution Orders for Defendants Sentenced in FY 2015²⁵

Federal District	Last Name	First Name	Case Number	Sentencing Date	Restitution Amount	Collected Restitution
C.D. Cal.	Porter	Roshaun Nakia	SACR 12-97(A)	20-Feb-15	\$866,244.68	\$75.00
C.D. Cal.	Horn	Marquis Monte	SACR 12-97(A)	24-Oct-14	\$69,719.34	\$0.00
S.D. Fla.	Price	William	13-20836-CR	21-Oct-14	\$8,250.00	\$0.00
S.D. Fla.	McKinley	Shaun	14-60163-CR	4-Dec-14	\$4,121.00	\$0.00
S.D. Fla.	Cadena	Carmen	98-14015-CR	18-May-15	\$1,261,563.00	\$0.00
N.D. Ga.	Murray	Fabian Terran	1:12-CR-285-02	12-May-15	\$1,000.00	\$0.00
N.D. Ga.	Murray	Fabian Terran	1:12-CR-286-01	12-May-15	\$1,000.00	\$0.00
N.D. Ga.	Rojas-Coyotl	Arturo	1:13-CR-128-01	22-Jan-15	\$190,000.00	\$0.00
N.D. Ga.	Martinez-Rojas	Odilon	1:13-CR-128-02	22-Jan-15	\$190,000.00	\$0.00
N.D. Ill.	McKee	Malik	12 CR 707-1	17-Oct-14	\$6,000.00	\$0.00
N.D. Ill.	Hull	Cameron	13 CR 216-1	17-Sep-15	\$400.00	\$0.00
N.D. Ind.	Huey-Dingle	Nathan	2:23CR135	17-Oct-14	\$78,721.11	\$0.00
D. Minn.	Tran	Tieu	14-25 (SRN)	12-Dec-14	\$51,844.00	\$300.00
W.D. Mo.	Smith	Joshua	13-00286-01-CR-W-GAF	20-Apr-15	\$23,406.00	\$0.00
W.D. Mo.	Farrell	Thomas	13-00083-02-CR-W-DW	12-Aug-15	\$292.00	\$292.00
W.D. Mo.	Wardlow	Tony	13-00083-01-CR-W-DW	12-Aug-15	\$292.00	\$0.00
S.D.N.Y.	Boyd	Elfego	13 CR 0890	8-Jan-15	\$20,000.00	\$0.00
S.D.N.Y.	Darby	Norman	13 CR 0890	2-Jul-15	\$6,500.00	\$0.00
E.D. Pa.	Brice	Rashidah	13-CR-206-02	22-Oct-14	\$35,700.00	\$0.00
E.D. Pa.	Womack	Christian	13-CR-206-02	18-Dec-14	\$35,700.00	\$0.00
E.D. Pa.	Smith	Enoch	12-CR-473-01	20-Nov-14	\$190,400.00	\$0.00
E.D. Pa.	Williams	Justin	13-CR-014-01	21-Jan-15	\$129,500.00	\$0.00
W.D. Tenn.	Eddins	Derrick	2:13CR20203-01	19-Mar-15	\$2,422.48	\$0.00
W.D. Tex.	Doak	Amber	SA13CR806(3)	27-Feb-15	\$1,500.00	\$70.00
W.D. Tex.	Wright	Marcus Deshawn	SA13CR806(1)	27-Feb-15	\$1,500.00	\$0.00
W.D. Tex.	Copeland	Malcolm Deandre	SA13CR806(2)	27-Feb-15	\$1,500.00	\$25.00
ED. Va.	Weeks	Tayron	1:14CR00313-001	12-Dec-14	\$15,000.00	\$0.00
ED. Va.	Miller	Ruth	1:13CR00175-001	19-Dec-14	\$351,437.50	\$175.00
ED. Va.	Haskins	Lenny	1:14CR00432-001	1-May-15	\$538,250.00	\$0.00
ED. Va.	Hodza	Aldair	3:15CR00032-001	14-Aug-15	\$17,197.50	\$0.00
ED. Va.	Sorensen	Laura	3:15CR00032-002	14-Aug-15	\$17,197.50	\$0.00
W.D. Wash	Cyprian	John	2:14-CR-0236-1	27-Apr-15	\$161,700.00	\$50.00

²⁵ This data includes cases filed by USAOs under 18 U.S.C. §§ 1581, 1583, 1584, 1589, 1590, 1591, 1592, and 1594, along with cases filed by HTPU.

The Attorney General's Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons for FY2016, Appendix C, pp. 139-141

Appendix C: Restitution Orders for Defendants Sentenced in FY 2016¹⁹

Federal District	Defendant Name	Case Number	Sentencing Date	Restitution Amount	Collected Restitution ²⁰
C.D. Cal.	Laron Darrell Carter	2:14-CR-297	18-Jul-2016	\$631,248.00	
N.D. Cal.	Crutchfield, Justin Everett	CR 14-00051-001	26-Jan-2016	\$2,000.00	\$110.00
N.D. Cal.	Toliver, Demontae Terrell	CR-14-00051-002	26-Jan-2016	\$2,000.00	\$25.00
S.D. Cal.	Cook, Jermaine	14CR1288-DMS	22-Sep-2016	\$42,803.12	\$100.00
S.D. Cal.	Foreman, Marcus	14CR1288-DMS	22-Sep-2016	\$42,803.12	\$0.00
S.D. Cal.	Hollins, Terry Carry	14CR1288-DMS	27-Jul-2016	\$42,803.12	\$0.00
S.D. Cal.	Ross III, Wilbert	14CR1288-DMS	20-Jul-2016	\$43,803.12	\$0.00
D. Conn.	Thomas, Edward	3:14CR31	17-Nov-2015	\$28,700.00	\$0.00
D. Conn.	Walters, Kayla	3:14CR31	07-Apr-2016	\$28,500.00	\$0.00
S.D. Fla.	Reyes-Perez, Timoteo	08-80145-CR	20-Jun-2016	\$21,600.00	\$33.48
N.D. Ga.	Daniels, Cole Jamal	1:15-CR-437-01	21-Mar-2016	\$8,300.00	\$0.00
N.D. Ga.	Jernigan, Isaiah	1:14-CR-024-01	02-May-2016	\$1,325.00	\$1,325.00
N.D. Ga.	Marcelin, Brianne	1:14-CR-024-04	15-Apr-2016	\$2,375.00	\$0.00
N.D. Ga.	St. Vil, Marie	1:14-CR-024-03	14-Apr-2016	\$2,375.00	\$0.00
N.D. Ga.	Williamson, Darren	1:14-CR-024-02	02-May-2016	\$1,325.00	\$0.00
N.D. Ill.	McKee, Shuntina	12-CR-707-2	31-May-2016	\$6,000.00	\$650.00
N.D. Ill.	Woods, Willie	12-CR-707-3	24-May-2016	\$6,000.00	\$0.00
D. Kan.	Harper, Natasha	6:15CR10155-001-JTM	18-Jul-2016	\$1,500.00	\$0.00
E.D. La.	Brown, Laquentin	13-CR-00286	13-Jul-2016	\$97,994.15	
E.D. La.	Ellis, Anthony	13-CR-00286	08-Jun-2016	\$97,994.15	
E.D. La.	Patel, Kanubhai	13-CR-00286	08-Jun-2016	\$97,994.15	\$0.00
E.D. La.	Phillips, Duane	13-CR-00286	08-Jun-2016	\$97,994.15	
E.D. La.	Robinson, Granville	13-CR-00286	04-May-2016	\$97,994.15	
E.D. La.	Taylor, Zacchaeus	13-CR-00286	08-Jun-2016	\$97,994.15	
E.D. La.	Williams, Christopher	13-CR-00286	13-Jul-2016	\$97,994.15	
M.D. La.	Dominique, Kellie M.	3:15CR000112-001	30-Jun-2016	\$14,535.00	\$560.00
D. Mass.	Jeffreys, Raymond	1:13-CR-10077-004	19-May-2016	\$10,500.00	\$0.00
E.D. Mich.	Ruiz, Locadio Eudenio	15CR20064 01	28-Jul-2016	\$5,400.00	\$25.00
W.D. Mich.	Smith, Tyrone	1:15CR135-01	11-May-2016	\$20,000.00	\$0.00
D. Minn.	Ely, Craig Anthony	15-262(2) SRN/HB	28-Apr-2016	\$2,205.00	\$0.00
D.N.J.	Senat, Wilbur	13-558	11-May-2016	\$60,000.00	\$0.00
D.N.J.	Verrier, Samuel	13-558	28-Aug-2016	\$60,000.00	\$0.00
E.D.N.Y.	Estrada-Tepal, Jorge	CR-14-0105	15-Dec-2015	\$1,033,336.00	\$0.00
E.D.N.Y.	Estrada-Tepal, Ricardo	CR-14-0105	15-Dec-2015	\$1,033,336.00	\$0.00
E.D.N.Y.	Estrada-Tepal, Victor	CR-14-0105	15-Dec-2015	\$1,033,336.00	\$0.00
E.D.N.Y.	Lashley, Kylon	CR-12-0489	01-Dec-2015	\$4,574.00	\$435.00
S.D.N.Y.	Chin, Benson	15-CR-00730-2	30-Jun-2016	\$9,520.00	\$1,300.00
S.D.N.Y.	He, Hong Ping	15-CR-0730	30-Jun-2016	\$9,520.00	\$0.00
W.D.N.Y.	White, Kenneth	1:13-CR-00255-001	18-May-2016	\$164,250.00	\$200.00
W.D.N.C.	Muslim, Shahid Hassan	3: 13CR00307-001	03-May-2016	\$13,840.00	\$0.00
N.D. Ohio	Castillo-Serrano, Aroldo	3:15CR-24	27-Jun-2016	\$67,232.00	\$0.00
N.D. Ohio	Duran, Jr., Pablo	3:15CR-24	11-Apr-2016	\$4,750.00	\$2.00
N.D. Ohio	Pedro Juan, Ana Angelica	3:15CR-24	27-Jun-2016	\$67,232.00	\$1.86

Federal District	Defendant Name	Case Number	Sentencing Date	Restitution Amount	Collected Restitution ²⁰
N D. Ohio	Salgado Soto, Conrado	3:15CR-24	11-Apr-2016	\$67,232.00	\$67,230.00
W.D. Okla.	Johnson, William Vontrail	CR-14-341-F	11-Jan-2016	\$900,000.00	\$50.00
E.D. Pa.	Weston, Linda	13-CR-025-01	05-Nov-2015	\$273,468.23	\$0.00
D.R.I.	Beverly, Damien	1:15CR00022-01S	08-Mar-2016	\$7,066.00	\$7,066.00
S.D. Tex.	Cerda, Lilia Medeles	4:13-CR-628-09	04-Dec-2015	\$569,340.00	\$0.00
S.D. Tex.	Garcia, Diana Medeles	4:13-CR-628-13	17-Dec-2015	\$534,140.00	\$56,116.97
S.D. Tex.	Medeles-Arguello, Hortencia	4:13-CR-628-01	20-Jan-2016	\$1,494,929.10	\$0.00
S.D. Tex.	Melendez-Gonzalez, Hugo Alexander	4:14-CR-497-01	16-Aug-2016	\$90,110.00	\$0.00
S.D. Tex.	Pleitez, Francis Yuvini Guerra	4:14-CR-497-03	17-Aug-2016	\$113,790.00	\$250.00
S.D. Tex.	Quintanilla, Jose William	4:14-CR-497-02	16-Aug-2016	\$90,110.00	\$0.00
S.D. Tex.	Quintanilla-Campos, Mariano	4:14-CR-497-05	18-Aug-2016	\$90,110.00	\$0.00
S.D. Tex.	Xalcut, Walter Alexander Ejcalon	4:14-CR-497-06	19-Aug-2016	\$90,110.00	\$0.00
W.D. Tex.	Al-Homoud, Hassan Salem	SA15CR391(1)	09-Feb-2016	\$120,000.00	\$120,000.00
W.D. Tex.	Al-Hosani, Zainab Mohamed Hasan Hatim	SA15CR391(1)	09-Feb-2016	\$120,000.00	\$0.00
D. Utah	Elliott, Aaron	1:15CR00010-001, DN	17-Dec-2015	\$1,704.69	\$200.00
D. Utah	Poike, Ashley Nicole	2:15CR00395-003, DVB	08-Dec-2015	\$1,300.00	\$30.78
D. Utah	Salankole, Abiodu Damiloca	2:15CR00393-001, DB	04-May-2016	\$500.00	\$0.00
E.D. Va.	Bonner, Jr., Robert	1:14CR00425-001	22-Jan-2016	\$317,750.00	\$0.00
E.D. Va.	Callis, Stephen	3:16CR00003-001	20-Jun-2016	\$32,500.00	\$0.00
E.D. Va.	Carter, Alexis	1:15CR000256001	18-Nov-2015	\$33,000.00	\$0.00
E.D. Va.	Flores, Eric Noe Araujo	1:15:CR-320-LO	03-Jun-2016	\$40,370.00	\$0.00
E.D. Va.	McLaughlin, Stefanie	1:15CR00079-001	24-Jun-2016	\$305,925.00	\$0.00
E.D. Va.	Randall, Michael	1:15CR00039-001	23-Oct-2015	\$645,890.00	\$75.00
E.D. Va.	Rashid, Muntasir	3:15CR00195-001	09-Jun-2016	\$820.00	\$0.00
E.D. Va.	Ruseckaitė, Giedre	1:15CR00157-001	02-Oct-2015	\$4,000.00	\$1,325.00
W.D. Va.	Kirby, Tremayne	715CR000026-001	17-Nov-2015	\$11,556.33	\$0.00
W.D. Wash.	Bonds, Nathan	2:14-CR-0074-1	03-Nov-2015	\$1,560.00	\$0.00
W.D. Wash.	Jackson Jr., Tony	3:14-CR-5242-2	22-Apr-2016	\$22,000.00	\$0.00
W.D. Wash.	Manago, Desmond	2:14-CR-0023-1	09-Nov-2015	\$100,000.00	\$15.00

¹⁹ This data includes cases filed by USAOs under 18 U.S.C. §§ 1581, 1583, 1584, 1589, 1590, 1591, 1592, and 1594, along with cases filed by HTPU.

²⁰ As of November 17, 2017.

