



# Using Civil Litigation to Combat Human Trafficking

Federal Human Trafficking  
Civil Litigation

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**2024 Data Update**

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# Acknowledgments

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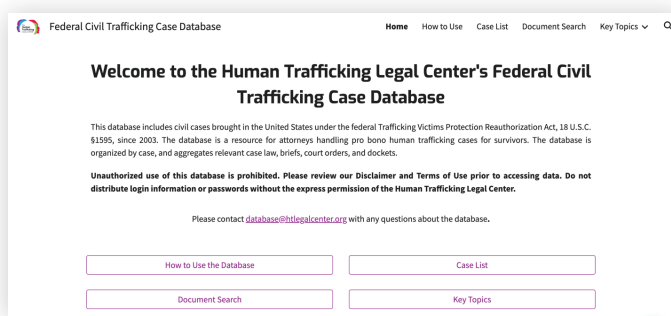
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# I. Introduction

In December 2003, Congress passed the Trafficking Victims Protection Reauthorization Act (“TVPRA”), amending federal law to provide trafficking survivors with a path to recover civil damages from their traffickers in federal courts. Trafficking survivors have used the private right of action, 18 U.S.C. § 1595 (“Section 1595”), to hold their traffickers accountable in courts for more than 20 years.



Between December 19, 2003, the date that federal civil cases became possible, and December 31, 2024, plaintiffs filed a total of 1,212 cases in federal courts under the TVPRA.<sup>1</sup> In 2024, new case filings continued to rise exponentially. Plaintiffs filed 280 new cases, more than any other year. Significantly, in 2024, the total number of cases alleging sex trafficking surpassed the total number of cases alleging forced labor for the first time ever.



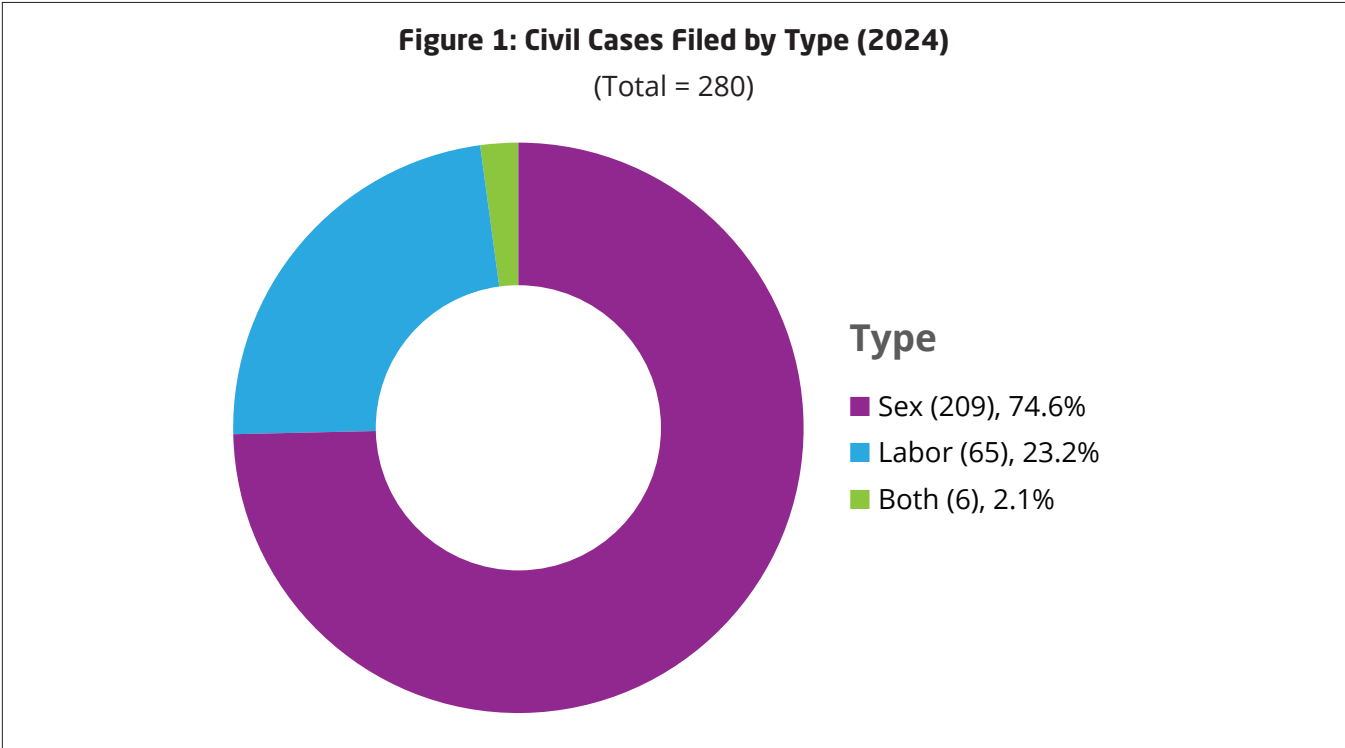
The Human Trafficking Legal Center maintains a database of every forced labor and sex trafficking civil case filed under the TVPRA since 2003. This report analyzes the federal civil trafficking cases filed since the enactment of the civil remedy in 2003 through December 31, 2024.<sup>2</sup>

<sup>1</sup> All references to cases filed in this report refer to civil federal trafficking claims brought pursuant to 18 U.S.C. § 1595, unless otherwise expressly noted.

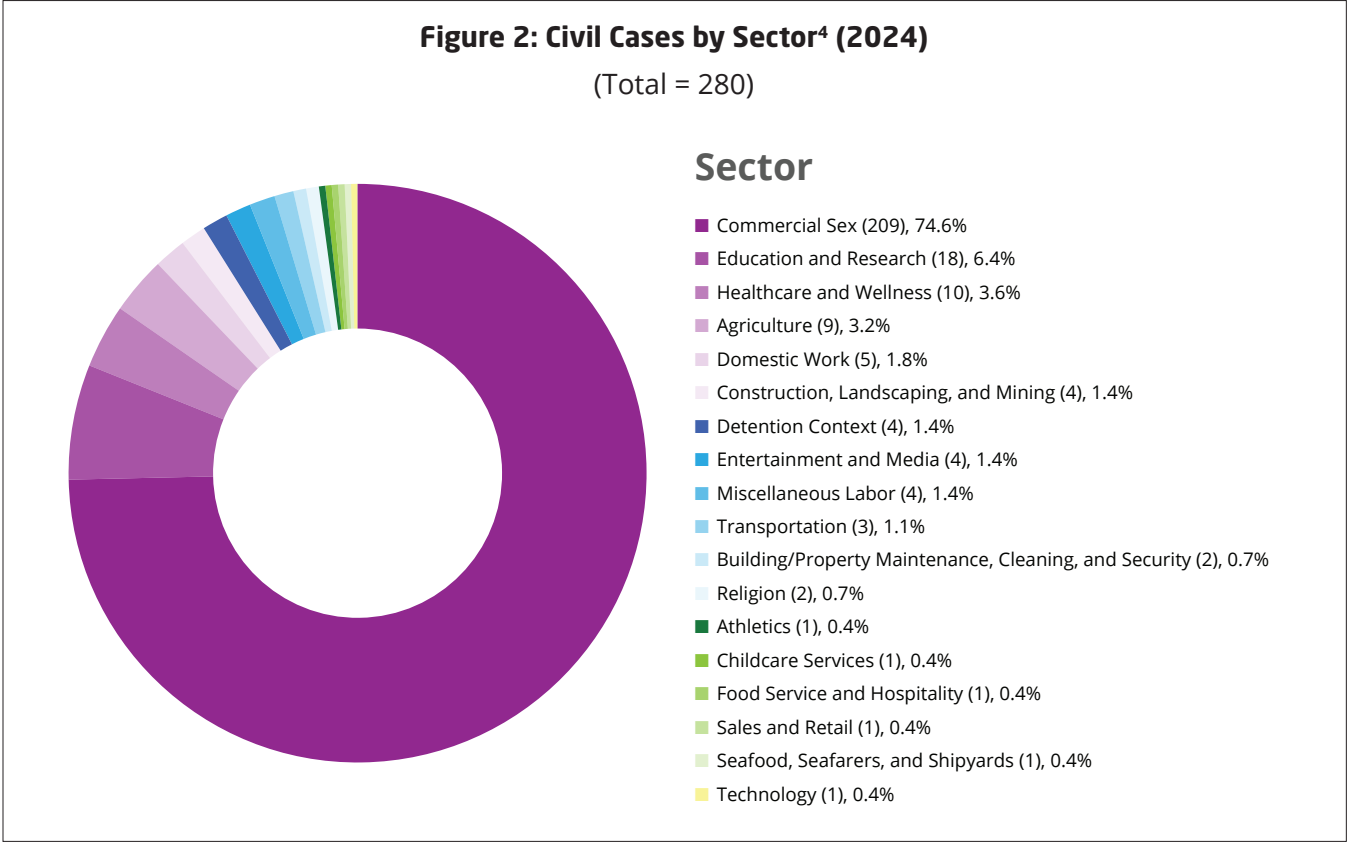
<sup>2</sup> Unless otherwise noted, the data in this report reflect civil cases filed as of December 31, 2024, and the status of all filed cases as of December 31, 2024. This report also includes updates to data for previous years. In conducting a detailed review of federal civil trafficking cases, nine additional cases were identified that had not been included in prior reports and six cases previously included in the report have been removed. One case alleging both sex trafficking and forced labor, filed in 2019, was excluded from the data set because it was filed under 18 U.S.C. § 2255, not 18 U.S.C. § 1595. One additional sex trafficking case, filed in 2021, was identified and included in this report. Two additional sex trafficking cases, filed in 2022, were identified and included in this report, while five sex trafficking cases from 2022 were excluded from the data set, one because it was filed under 18 U.S.C. § 2255, one because it was erroneously included, and three because they were consolidated into a multi-district litigation where there is no claim under 18 U.S.C. § 1595. Six additional cases filed in 2023—one forced labor and five sex trafficking—were identified and included in this report.

## II. Year at a Glance: 2024 Federal Civil Trafficking Cases by Type and Sector

In 2024, plaintiffs filed a record-breaking 280 cases alleging violations of federal trafficking laws codified in the TVPRA. This exceeded the number of civil federal trafficking cases filed in any other year, including 2023, when plaintiffs filed the previous record high of 198 new civil cases. This significant rise in cases filed—an increase of 82 new cases from the prior record high—is largely attributable to the continued rise in cases alleging sex trafficking. Of the 280 new cases filed, 209 allege only sex trafficking, 65 allege only forced labor, and six allege both sex trafficking and forced labor. However, even though almost 77 percent of the new cases involved allegations of sex trafficking, cases involving forced labor allegations continued to climb steadily. The 65 cases alleging only forced labor filed in 2024 surpassed the previous high of 48 forced labor cases filed in 2023.



Of the 65 cases filed in 2024 that included only allegations of forced labor, more than a quarter of the cases involved the education and research sector (18). All but one of these 18 cases were filed against the operators of teen rehabilitation programs, continuing a trend first identified in 2023.<sup>3</sup>



Of the 209 cases alleging only sex trafficking, the dockets continued to be dominated by cases brought against hotels and the hospitality industry. The cases against hotels and the hospitality industry accounted for over 80 percent of the cases alleging sex trafficking filed in 2024. Plaintiffs filed more sex trafficking cases against hotels (174) in 2024 than in the last two years combined (71 in 2023 and 81 in 2022). In contrast, the number of cases filed against internet service providers dropped dramatically, decreasing from a record high of 37 new cases in 2023 to only one such case filed in 2024.

<sup>3</sup> See ASHLYN PHELPS, THE HUMAN TRAFFICKING LEGAL CENTER, USING CIVIL LITIGATION TO COMBAT HUMAN TRAFFICKING: TWENTY YEARS OF CIVIL LITIGATION UNDER THE TRAFFICKING VICTIMS PROTECTION REAUTHORIZATION ACT: 2003-2023, 25 (December 2024) (hereinafter, the “20 Year Report”).

<sup>4</sup> “Sector” refers to the actual sector or industry in which the plaintiff was trafficked. The “commercial sex” sector is used for all sex trafficking cases. The “transportation” sector includes air transportation, automotive repair or cleaning, and ground transportation. Cases involving forced labor on ships and in shipyards are included within the “Seafood, Seafarers, and Shipyards” sector.

**Figure 3: Civil Cases by Sector (2024)**

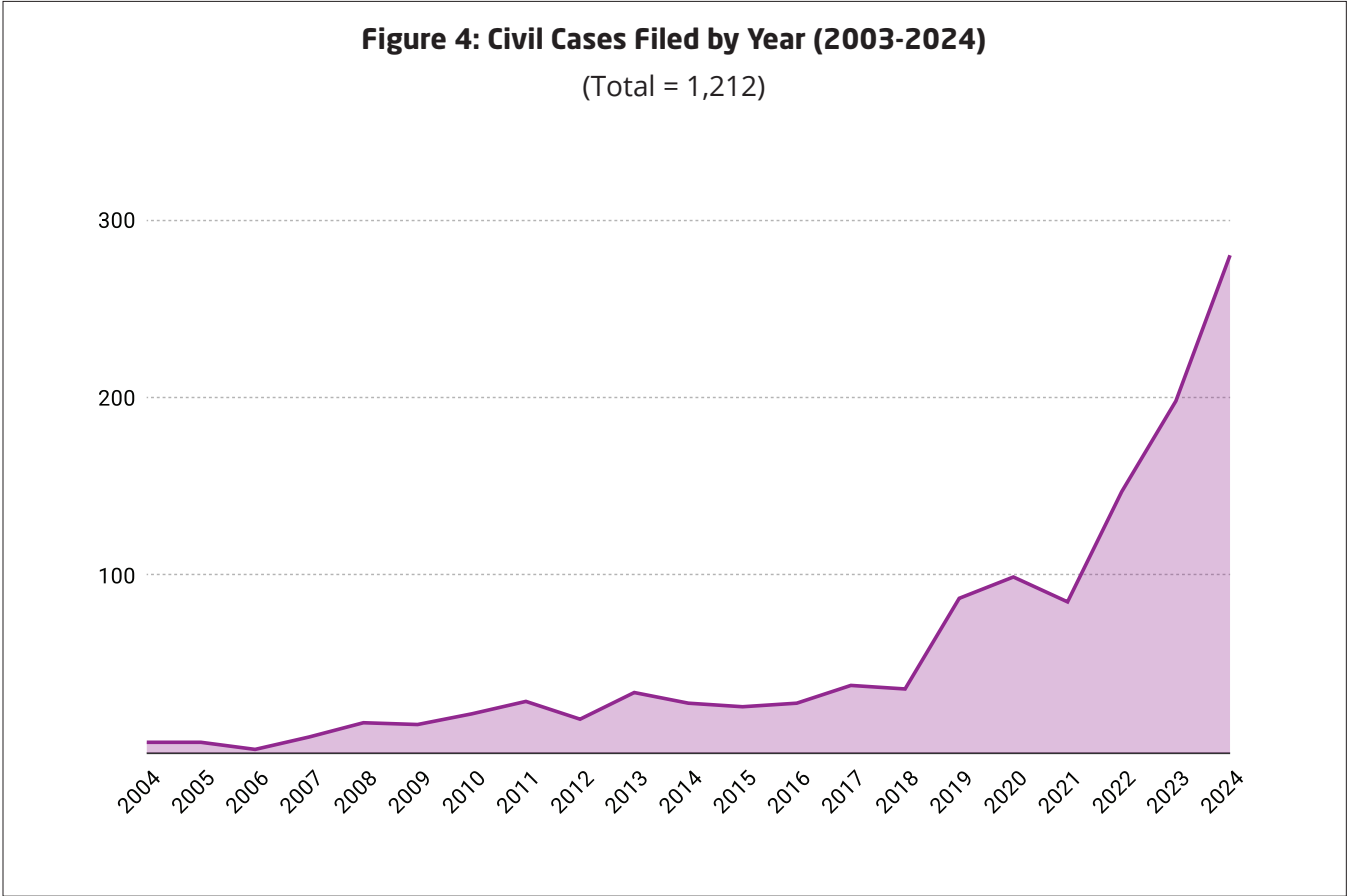
Sector	# of cases filed in 2024
Commercial Sex	209
Education and Research	18
Healthcare and Wellness	10
Agriculture	9
Domestic Work	5
Construction, Landscaping, and Mining	4
Detention Context	4
Entertainment and Media	4
Miscellaneous Labor	4
Transportation	3
Building/Property Maintenance, Cleaning, and Security	2
Religion	2
Athletics	1
Childcare Services	1
Food Service and Hospitality	1
Sales and Retail	1
Seafood, Seafarers, and Shipyards	1
Technology	1
<b>Total</b>	<b>280</b>



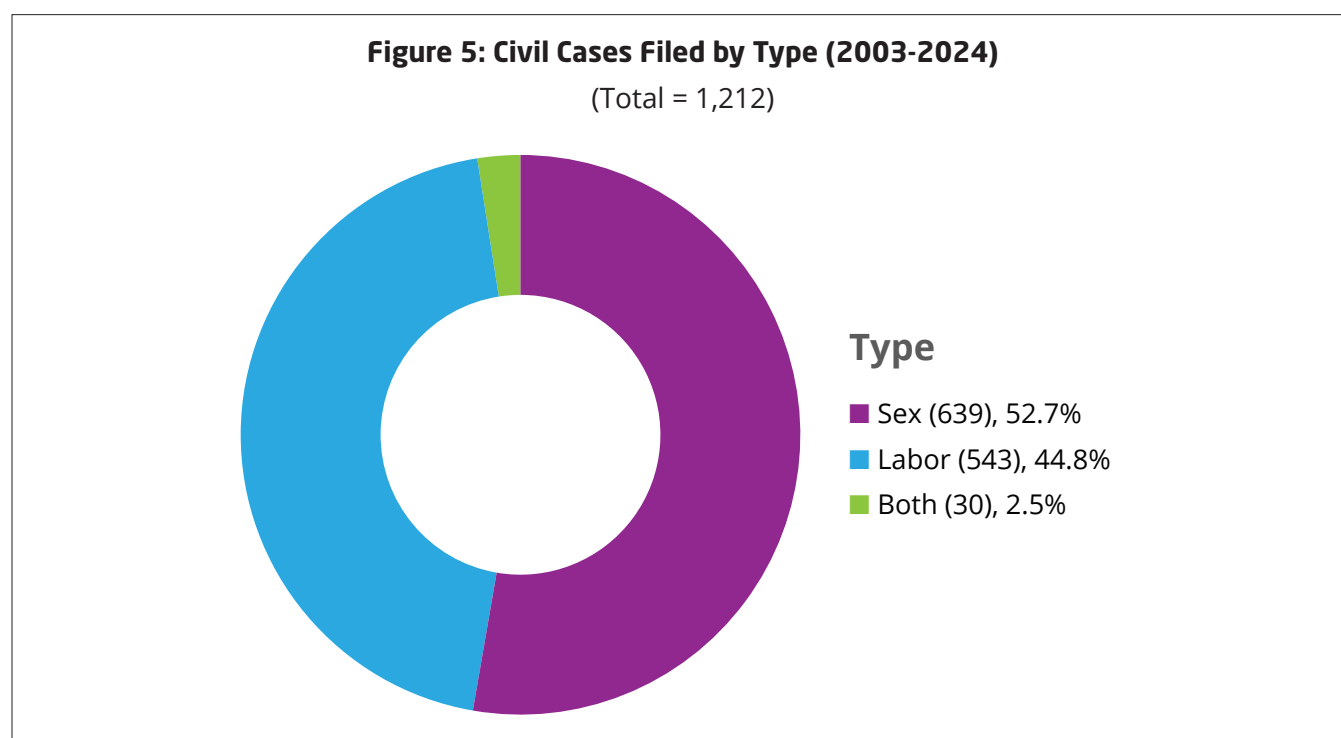
# III. Overview of All Forced Labor and Sex Trafficking Cases Filed from 2003 to 2024

## A. Civil Trafficking Cases Filed by Year and Type from 2003 to 2024

Between December 19, 2003, when it became possible to file federal civil trafficking cases, and December 31, 2024, plaintiffs filed 1,212 cases under Section 1595 of the TVPRA. In the twenty-one years since the enactment of the civil remedy, filings have grown from just six cases in 2004 to 280 in 2024.



In 2009, a plaintiff filed a civil case alleging sex trafficking under Section 1595 for the first time.<sup>5</sup> Prior to 2009, all civil trafficking cases filed under Section 1595 alleged only forced labor, and, until 2024, the total number of forced labor cases exceeded the total number of sex trafficking cases. However, in 2024, the total number of sex trafficking cases surpassed the total number of forced labor cases for the first time. As of December 31, 2024, plaintiffs had filed 639 cases alleging sex trafficking, 543 cases alleging forced labor, and 30 cases alleging both sex trafficking and forced labor. As of December 31, 2024, there were almost a hundred more sex trafficking cases filed than forced labor cases filed since the enactment of the civil remedy.

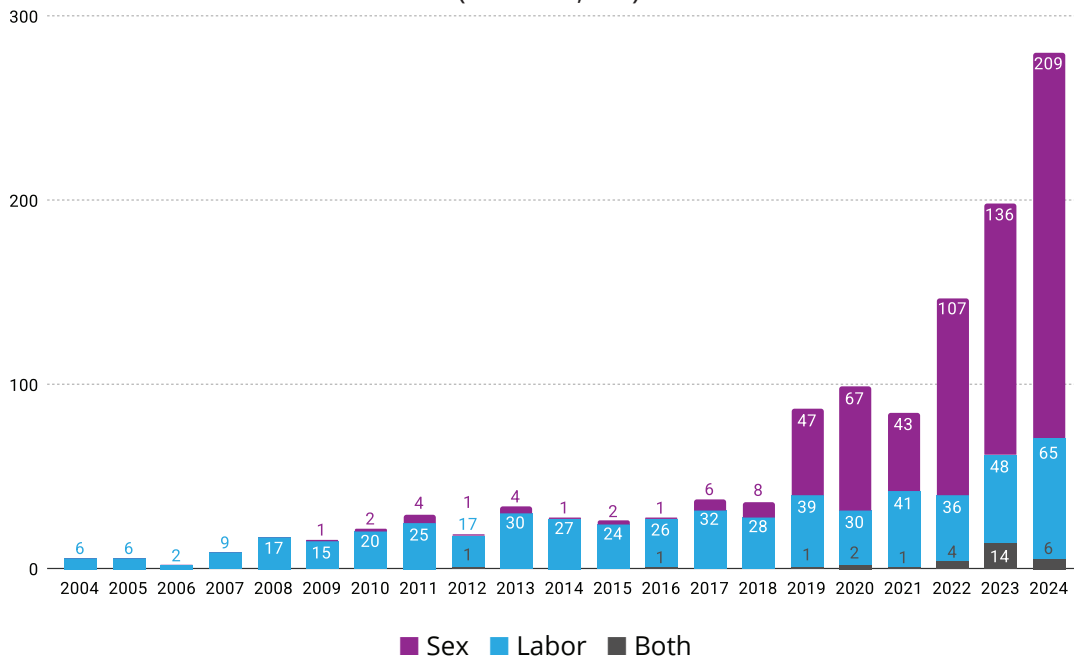


The steady increase in sex trafficking cases is demonstrated by the historic number of cases filed in 2024. However, forced labor cases have also increased, albeit at a slower pace. In 2024, plaintiffs filed 65 cases involving only forced labor—a significant increase over the prior high of 48 in 2023.

<sup>5</sup> See *Ditullio v. Boehm*, No. 3:09-cv-00113 (D. Alaska). After the defendant pled guilty in the federal criminal case brought against him, the plaintiff filed a civil action. The civil case settled for \$400,000.

**Figure 6: Civil Cases Filed by Year and Type (2003-2024)**

(Total = 1,212)



## B. Civil Trafficking Cases Filed by Location from 2003 to 2024

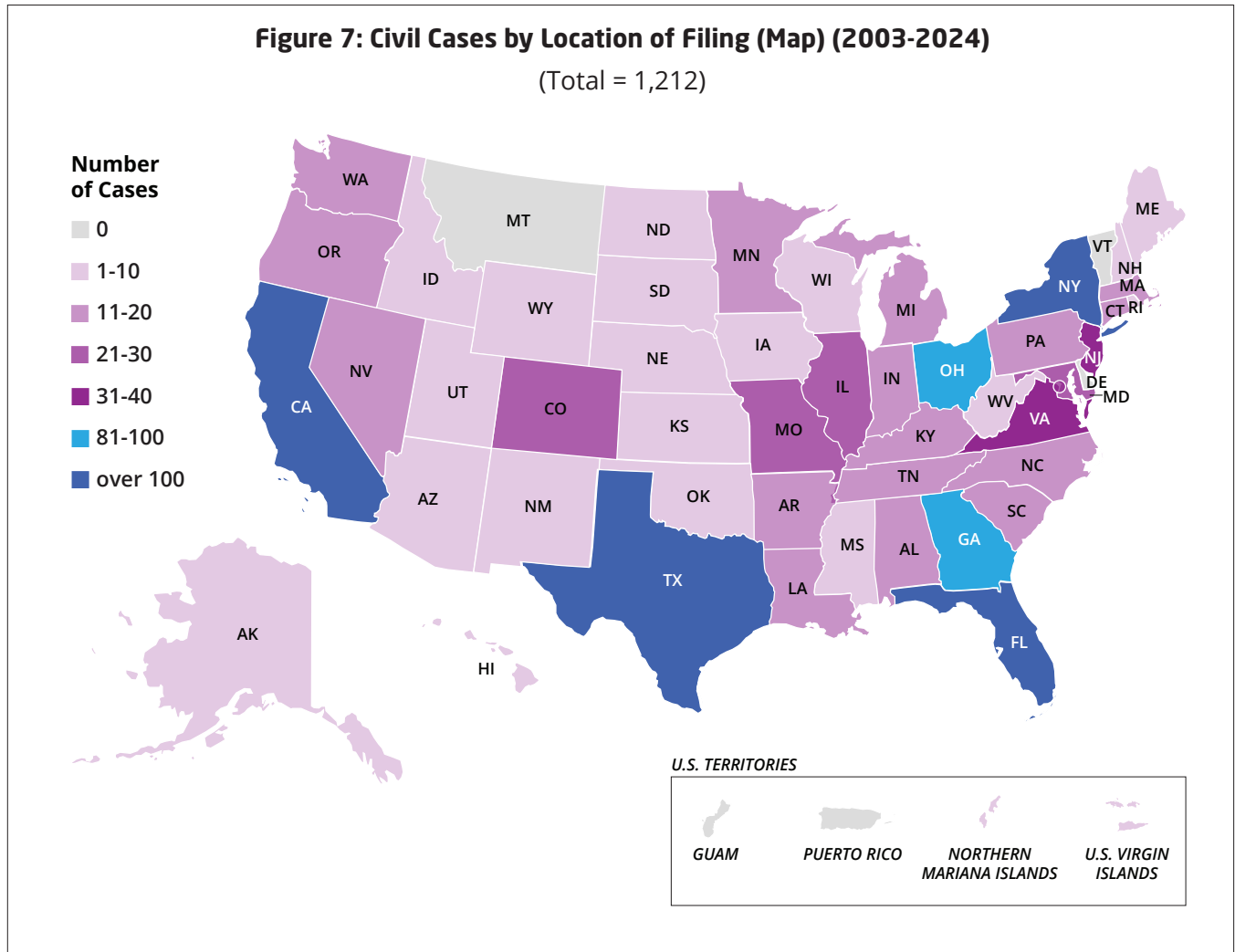
As of December 31, 2024, plaintiffs had filed cases in 47 states, the District of Columbia, and two territories. Plaintiffs have filed the highest number of cases in New York (177), Texas (149), and Florida (128).<sup>6</sup>

In 2024, plaintiffs filed more than 60 percent of the new cases in just six states: Texas (46), California (35), Florida (27), New York (25), Ohio (23), and Georgia (22). Plaintiffs filed cases predominantly alleging sex trafficking in Texas (45 of 46), California (33 of 35), Ohio (23 of 23), and Georgia (20 of 22). In contrast, plaintiffs filed a significant number of forced labor cases in Florida (19 of 27) and New York (13 of 25). Plaintiffs also filed the first civil trafficking case ever in Nebraska in 2024, alleging forced labor at a swine production facility.<sup>7</sup> As of December 31, 2024, Delaware, Guam, Montana, Puerto Rico, and Vermont were the only remaining states and territories where plaintiffs have not filed any federal

<sup>6</sup> The data discussed in this report reflect only case filings in federal courts. Many states allow trafficking survivors to pursue a private right of action under their state's analogue of the TVPRA.

<sup>7</sup> See *Alvarado Contreras v. Livingston*, No. 4:24-cv-03155 (D. Neb.).

civil trafficking cases.<sup>8</sup> Five other states continued to see low filing numbers, with only one federal civil trafficking case ever filed: Hawaii, Idaho, New Hampshire, Rhode Island, and West Virginia.



## C. Outcomes in Federal Civil Trafficking Cases from 2003 to 2024

As of December 31, 2024, 488 cases, more than 40 percent of all civil trafficking cases ever filed, remained ongoing. The significant number of ongoing cases is not surprising given the surge of

8 Previous reports did not include Delaware in this list. A civil trafficking case filed in Delaware in 2019 was excluded from the data set because the trafficking claim was brought under 18 U.S.C. § 2255.

filings in recent years. Meanwhile, as of December 31, 2024, courts had either resolved or stayed 724 cases. Of these 724 cases, more than 53 percent resulted in a settlement (332) or judgment for the plaintiff (58),<sup>9</sup> as compared to less than nine percent that resulted in a judgment for the defendant (9) or involuntary dismissal (52). While a significant number of cases resulted in a publicly disclosed settlement agreement (332), the terms of the settlement, including the amount of damages awarded, remained confidential in most cases. Of the 332 civil trafficking cases that ended with a settlement, 263, or 79 percent, of those settlement agreements were confidential. Additionally, 17 percent of the resolved cases resulted in a voluntary dismissal with prejudice (123). This designation often is a result of a confidential settlement, although it is not a definitive indication that a case settled.

At the end of 2024, courts had administratively stayed 59 civil trafficking cases, 14 of them due to ongoing criminal proceedings. Federal courts administratively stay cases for a variety of reasons, including when there are related bankruptcy or criminal proceedings, an arbitration requirement, or where a case has been consolidated under a lead case. With respect to criminal proceedings, Section 1595(b) specifically provides that “[a]ny civil action filed under subsection (a) shall be stayed during the pendency of any criminal action arising out of the same occurrence in which the claimant is the victim.” Criminal action is defined to include both investigations and prosecutions. Of the 14 cases stayed as a result of criminal actions, half of the cases relate to high-profile defendants, including five cases against Backpage.com, LLC, one against the former CEO of Abercrombie, Michael Jeffries,<sup>10</sup> and his partner, Matthew Smith, and one against an associate of former fashion executive, Peter Nygard.

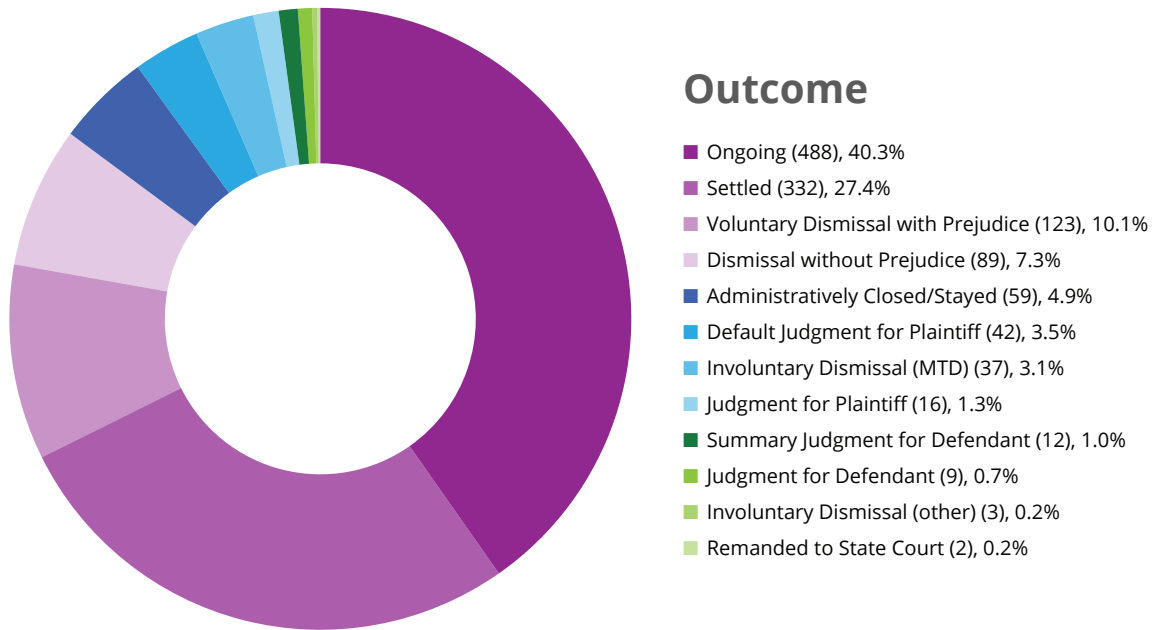


<sup>9</sup> This number includes default judgments, judgments on the pleadings, and judgments at trial.

<sup>10</sup> A federal court in New York declared Jeffries unfit to stand trial in the related criminal action. See Order at 2, *United States v. Jeffries*, No. 2:24-cr-00423 (E.D.N.Y. May 2, 2025); see also Santul Nerkar, *Former Abercrombie C.E.O. Ruled Unfit to Stand Trial for Sex Trafficking*, N.Y. TIMES, May 2, 2025, <https://www.nytimes.com/2025/05/02/nyregion/abercrombie-jeffries-unfit-to-stand-trial.html>.

**Figure 8: Civil Cases by Outcome (2003-2024)**

(Total = 1,212)



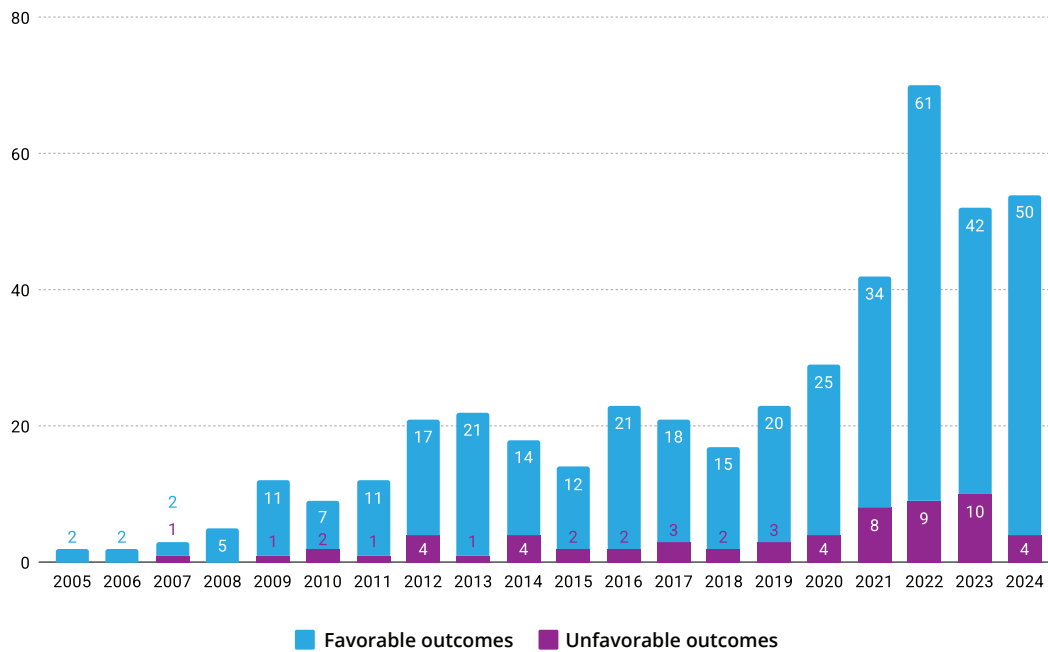
Cases filed under Section 1595 have continued to result in favorable outcomes for plaintiffs more often than in unfavorable outcomes.<sup>11</sup> In 2024, 50 cases resolved with a favorable outcome as compared to only four with an unfavorable outcome. The damages awarded were publicly available only in 18 of the 50 cases, but those 18 cases resulted in \$16,325,458.25 in damages in 2024.<sup>12</sup> Notably, most of the known damages in 2024, \$15,082,114.25, related to forced labor cases. Courts awarded only \$1,305,344.00 of the known damages in relation to sex trafficking cases.

<sup>11</sup> Favorable outcomes include judgments for plaintiffs and settlements. Unfavorable outcomes include judgments for defendants and involuntary dismissals. Voluntary dismissals—either with or without prejudice—are not included in either category.

<sup>12</sup> The damages award amount reflects only publicly disclosed settlements and judgments available on court dockets. This amount includes any known fees and costs, such as attorneys' fees and settlement administration costs. This number does not include confidential, non-public settlements, which make up a significant number of the settlements.

**Figure 9: Civil Cases by Outcome and Year (2003-2024)**

(Total = 451)



## D. Plaintiffs in Civil Trafficking Cases from 2003 to 2024

### 1. Plaintiff's Country of Origin

As of December 31, 2024, plaintiffs from 86 different countries had filed federal trafficking cases. In 2024, plaintiffs from Egypt and the Netherlands brought the first cases ever filed by nationals of those countries. U.S. citizens continued to bring the largest number of cases, the majority involving allegations of sex trafficking (441 of 512). Citizens of Mexico (94 cases), the Philippines (91 cases), and India (44 cases) filed the largest number of cases, with all but one case involving allegations of forced labor.

**Figure 10: Trafficking Plaintiff's Country of Origin (2003-2024)**

Country of Origin of Plaintiff(s)	# of cases	Country of Origin Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases
Afghanistan	1	El Salvador	4	Malaysia	3	South Korea	4
Australia	2	Eritrea	1	Mali	2	Sri Lanka	3
Bahamas	1	Ethiopia	5	Mexico <sup>13</sup>	94	St. Vincent and the Grenadines	1
Bangladesh	5	France	2	Moldova	1	Sudan	1
Belarus	1	Germany	3	Morocco	3	Suriname	1
Bolivia	2	Guatemala	19	Namibia	2	Swaziland	1
Bosnia and Herzegovina	1	Guinea	1	Nepal	4	Switzerland	1
Brazil	5	Haiti	3	Netherlands	1	Syria	1
Burkina Faso	2	Honduras	8	New Zealand	1	Taiwan	2
Cambodia	5	Hungary	1	Nicaragua	2	Tanzania	3
Cameroon	4	India	44	Nigeria	3	Thailand	4
Canada	5	Indonesia	10	Pakistan	7	Turkey	2
Chile <sup>14</sup>	7	Iran	1	Panama	1	Uganda	3
China	12	Ivory Coast	1	Paraguay	2	Ukraine	2
Colombia	5	Jamaica	3	Peru	11	United Kingdom	2
Costa Rica	1	Jordan	1	Philippines	91	United States <sup>15</sup>	512
Croatia	2	Kazakhstan	1	Poland	4	Venezuela	1
Cuba	1	Kenya	3	Romania	1	Vietnam	2
Dem. Republic of Congo	2	Laos	1	Russia	4	Zambia	1
Dominican Republic	6	Liberia	1	Serbia	2	Zimbabwe	1
Ecuador	4	Madagascar	1	Slovenia	2	Unknown <sup>16</sup>	273
Egypt	1	Malawi	1	South Africa	6		

<sup>13</sup> One case filed prior to January 1, 2024, by plaintiffs from Mexico, that was not included in the 20 Year Report, has now been added.

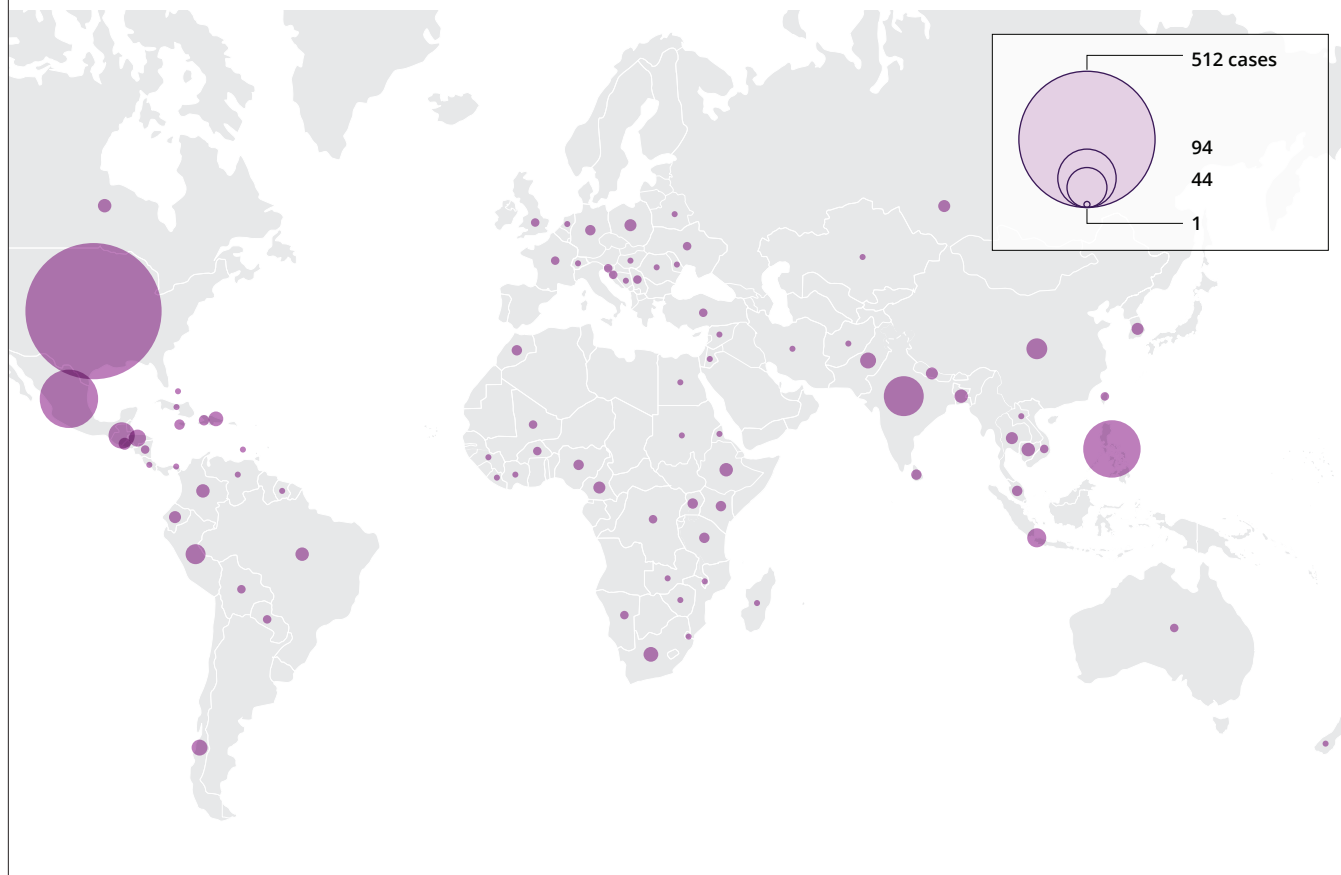
<sup>14</sup> One case filed prior to January 1, 2024, by plaintiffs from Chile, that was not included in the 20 Year Report, has now been added.

<sup>15</sup> The number of plaintiffs from the United States has been updated. In one case, the plaintiff's country of origin was corrected from unknown to the United States. In thirteen cases, the plaintiff's country of origin was unknown.

<sup>16</sup> The plaintiff's country of origin cannot be determined in every case, as this information contained in this figure is taken from public filings on the civil dockets. The plaintiff's country of origin was categorized as unknown in cases where no nationality could be found in the case's public filings.



**Figure 11: Trafficking Plaintiff's Country of Origin (Map) (2003-2024)**



## 2. Plaintiff's Immigration and Visa Status<sup>17</sup>

As of December 31, 2024, foreign-born plaintiffs had filed 37 percent of all civil trafficking cases (449 of 1,212).<sup>18</sup> Of the 449 cases filed by foreign-born plaintiffs, 428 involved allegations of forced labor. The majority of cases where the method of entry can be ascertained involved plaintiffs who entered the United States with visas or other legal status (351 of 372).<sup>19</sup> Conversely, the percentage of cases involving plaintiffs who entered the United States without inspection or with fraudulent documents was about five percent (21 of 372).

<sup>17</sup> This section focuses on each plaintiff's method of entry and visa status at the time that they entered the United States. But where the visa is converted to another type and the exploitation of that visa is central to the trafficking, the report notes both visas.

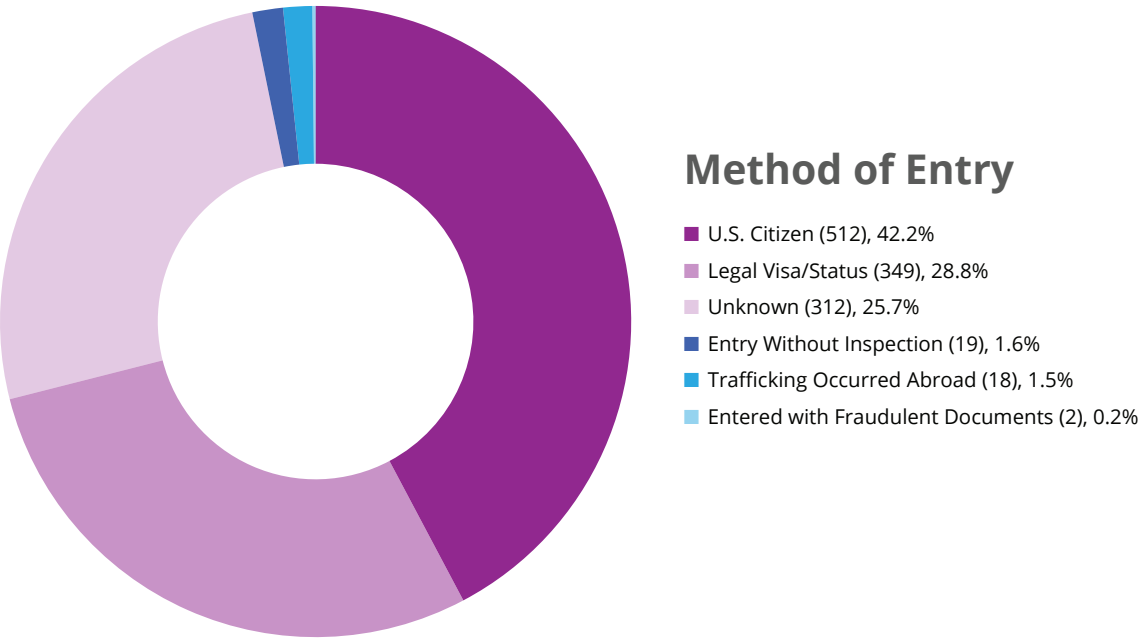
<sup>18</sup> This includes all cases where the plaintiff's country of origin could be determined from publicly available information as being outside the United States. In 257 cases, there was no publicly available information with respect to whether the plaintiff's country of origin was outside the United States.

<sup>19</sup> In 59 cases, there was not any publicly available information with respect to the plaintiff's immigration and visa status and, therefore, these cases were categorized as "Unknown." Additionally, in cases with a mix of foreign-born and U.S.-citizen plaintiffs, this section focused on the method of entry of the foreign-born plaintiffs.

The number of cases filed by U.S. citizens surged in 2024, a reflection of the increase in the number of cases involving allegations of sex trafficking. As of December 31, 2024, U.S. citizens had filed 42 percent (512) of all cases. Eighty-six percent of cases filed by U.S. citizens involved allegations of sex trafficking (441 of 512). This proportion remained steady from 2023.

**Figure 12: Cases by Plaintiff's Method of Entry into the United States (2003-2024)**

(Total = 1,212)



In some instances, a plaintiff can bring a lawsuit under Section 1595 even when all of the trafficking occurred abroad. The TVPRA provides extraterritorial jurisdiction under 18 U.S.C. § 1596. In order to bring a suit for conduct that occurred abroad, the *defendant* must be a U.S. citizen, a green-card holder, or be present in the United States. Plaintiffs bringing these cases frequently have no immigration status under U.S. law, as the trafficking occurred abroad, and they often did not enter the United States.

In 2024, plaintiffs filed three cases invoking the extraterritorial jurisdiction provisions of the TVPRA, bringing the total as of December 31, 2024, to 32 cases.<sup>20</sup> Of the 32 extraterritorial cases, 81 percent involved allegations of forced labor (26). In one of the three new cases, *Lun v. Milwaukee Electric Tool*

<sup>20</sup> This number reflects all cases in which the plaintiffs cited Section 1596 in the complaint, as well as two cases, *Roe v. Howard*, No. 1:16-cv-00562 (E.D. Va.), and *Aguilera v. Aegis Commc'ns Grp., LLC*, No. 3:14-cv-05118 (W.D. Mo.), in which Section 1596 was relied upon during litigation in support of the plaintiffs' claims. Of the 32 cases that invoked Section 1596, 28 included allegations of trafficking crimes that occurred outside of the United States. One

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# THE WALL STREET JOURNAL.

## Milwaukee Tool Sued Over Alleged Chinese Forced Labor in Supply Chain

A former prisoner says he was forced to make work gloves bearing the logo of the tool company

By [Richard Vanderford](#) [Follow](#)  
June 27, 2024 6:51 pm ET

Corp., a political prisoner in China alleged he was forced to produce work gloves for a Wisconsin-based power tool company under onerous working conditions.<sup>21</sup> The plaintiff and others allegedly were paid between \$1 a day to \$1 a month and subjected to various forms of physical torture if they did not meet production quotas.<sup>22</sup>

### 3. Plaintiffs Proceeding Anonymously

Plaintiffs also continued to file cases anonymously. Plaintiffs can request to proceed anonymously using a pseudonym (like Jane or John Doe) or initials. Proceeding under a pseudonym is an important legal tool to protect trafficking survivors' privacy and safety, as they may fear retribution from their traffickers or other harm resulting from the public disclosure of their identity. Of the 1,212 cases filed as of December 31, 2024, plaintiffs were permitted by the federal courts to proceed under a pseudonym in nearly half (600) of the cases, an increase from more than 40 percent in 2023. In 2024, plaintiffs proceeded anonymously in 210 of the 280 new cases filed.

To obtain permission to proceed anonymously, a plaintiff must file a motion that sets forth the reasons why confidentiality is needed and why that need overcomes the presumption that legal proceedings remain public. Federal courts frequently grant these motions in both forced labor and sex trafficking cases, recognizing that proceeding anonymously is an important protection for the plaintiffs filing these cases.

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case, previously included in the total count, was removed after subsequent review determined that the plaintiff erroneously cited Section 1596 in the complaint.

<sup>21</sup> See Amended Complaint at 13-17, *Lun v. Milwaukee Electric Tool Corp.*, No. 2:24-cv-00803 (E.D. Wis. Oct. 14, 2024).

<sup>22</sup> See *id.* at 17-18.

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## 4. Class Certification

Between 2003 and 2024, plaintiffs sought to file cases as a class action in 104 cases.<sup>23</sup> Class actions are suits brought on behalf of a large group of similarly situated individuals. In order to receive class certification, the district court must first determine whether “the questions of law or fact common to class members predominate over any questions affecting only individual members, and that a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.”<sup>24</sup>

Plaintiffs filed the first trafficking case seeking to certify a class in 2005. For the next decade, the number of plaintiffs seeking to certify a class in civil trafficking cases remained low, averaging about two cases per year. In 2017, plaintiffs filed motions for class certification in 11 cases. Since then, the number of cases involving class certification has continued to grow, with an average of nine cases filed per year between 2018 and 2024. The majority of these cases involved allegations of forced labor (88 of 104 cases).

As of December 31, 2024, courts had granted plaintiffs’ class certification requests (either fully or in part) in 32 civil trafficking cases and denied the requests in full in 14 cases. Of the 32 cases

in which courts granted class certification, courts certified 22 cases on the basis of a claim under the TVPRA. Conversely, of the 14 cases where courts denied class certification, courts denied certification under a TVPRA claim in 10 cases. In addition, in five cases, the court granted a class settlement without specifying the type of claim for which the class was certified. In 26 cases, the class certification motion was pending before the court as of December 31, 2024. The remaining 27 cases were closed before a determination was made on class certification.

### *Chang v. Shen Yun Performing Arts, Inc.*

In *Chang v. Shen Yun Performing Arts, Inc.*, the plaintiff, a former Shen Yun dancer, alleged that the defendants recruited the children of Falun Gong practitioners, promising their families that they would obtain an education if they attended schools associated with the dance company.<sup>25</sup> The defendants strictly controlled all aspects of the children’s lives and allegedly threatened them with grave harm if they wanted to leave. Threats included statements that the students would have to pay back \$50,000 yearly “scholarships for their tuition.”<sup>26</sup> The plaintiff filed this class on behalf of herself and all others similarly situated against the dance company and associated schools.<sup>27</sup>

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<sup>23</sup> While all 104 cases involve claims under TVPRA, in some instances the plaintiffs only sought class certification on non-TVPRA claims.

<sup>24</sup> Fed. R. Civ. P. 23(b)(3).

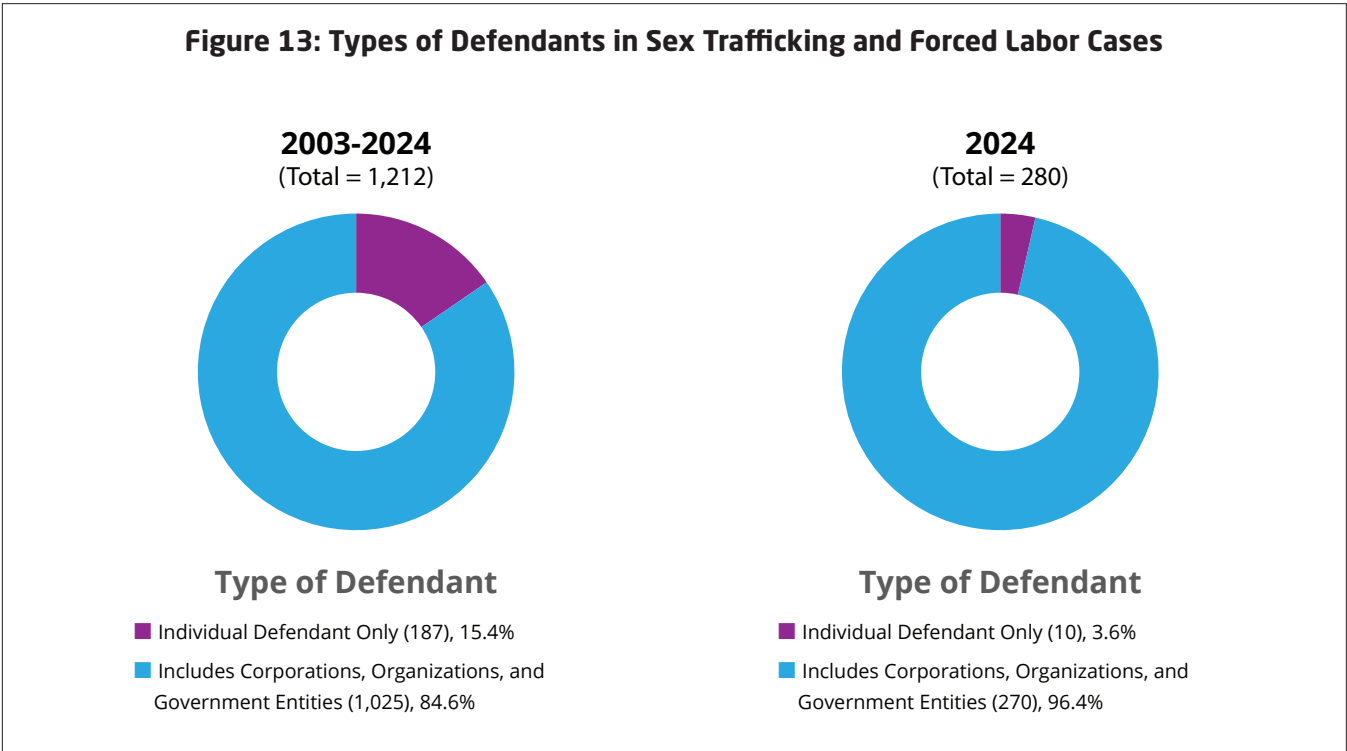
<sup>25</sup> See Complaint at 1-2, 40, *Chang v. Shen Yun Performing Arts, Inc.*, No. 7:24-cv-08980 (S.D.N.Y. Nov. 25, 2024).

<sup>26</sup> See *id.* at 5-6.

<sup>27</sup> See *id.*

# E. Defendants in Civil Trafficking Cases from 2003 to 2024

As of December 31, 2024, almost 85 percent of all civil trafficking cases involved at least one corporate or institutional defendant (1,025).<sup>28</sup> Of those cases, 630 included allegations of sex trafficking and 420 included allegations of forced labor. The proportion of total TVPRA cases brought only against individual defendants, including diplomats and international organizational employees, decreased from 19 percent in 2023 to about 15 percent in 2024. However, as a subset of all the cases filed against individual defendants, the percentage brought against diplomats and international organizational employees remained steady at 25 percent (47 of 187).



In the last five years, plaintiffs have increasingly used the TVPRA civil remedy to hold institutional and corporate defendants accountable. Relying on the TVPRA’s expanded liability for those who participate in a venture engaged in trafficking violations,<sup>29</sup> plaintiffs have brought federal cases against medical

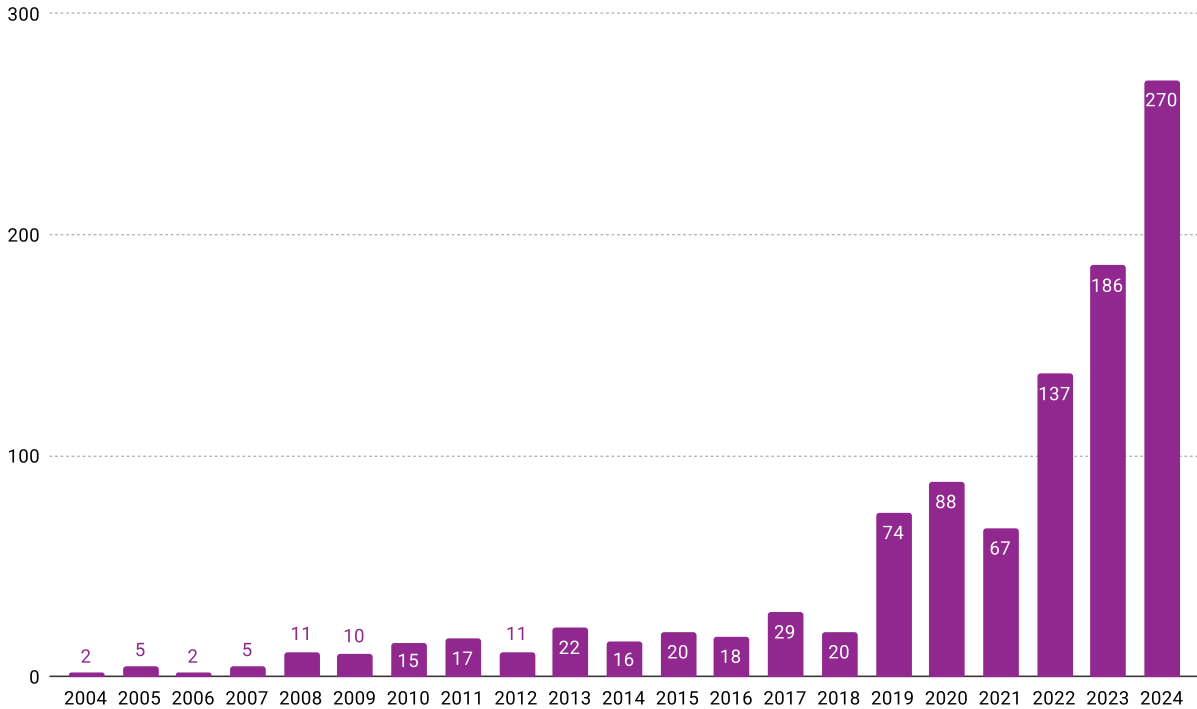
<sup>28</sup> Corporate and institutional defendants include corporations, academic institutions and universities, government agencies, labor recruitment and staffing agencies, detention institutions, religious organizations, and professional sports associations.

<sup>29</sup> In 2008, Congress expanded Section 1595 to permit plaintiffs to bring lawsuits against “whoever knowingly benefits, or attempts or conspires to benefit, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of [Chapter 77 of Title 18, federal laws prohibiting peonage, slavery, forced labor, and trafficking].” This provision, often referred to as “venture

staffing agencies, academic institutions, and hotels, among many other corporate entities. In 2024, plaintiffs filed 270 cases involving at least one corporate or institutional defendant.

**Figure 14: Civil Cases Against Corporate and Institutional Defendants by Year (2003-2024)**

(Total = 1,025)



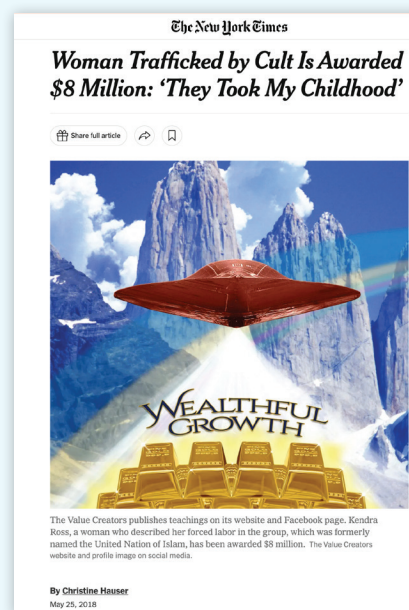
liability,” expanded liability beyond direct perpetrators to include those who knowingly benefit from participating in a venture engaged in forced labor or sex trafficking. In 2024, Congress passed a technical and clarifying update to make clear the intended scope of this section.



In recent years, there has been an increase in civil trafficking cases filed against religious institutions and organizations. In total, plaintiffs have filed 23 cases against these defendants, with 15 of those cases filed between 2020 and 2024. Of the 23 cases, 12 alleged forced labor, nine alleged sex trafficking, and two alleged both forced labor and sex trafficking. However, looking just at the most recent cases—15 cases filed between 2020 and 2024—the majority involve allegations of sex trafficking (eight sex trafficking only cases and two sex trafficking and forced labor cases). Plaintiffs filed most cases against established religious institutions, including the Catholic Church, Scientology, the Church of Jesus Christ of Latter-day Saints, and Hindu or Buddhist organizations (18 cases). Thus far, the cases against religious institutions or organizations have had a variety of outcomes: two cases ended with a judgment for the plaintiff,<sup>30</sup> three cases settled, two cases were voluntarily dismissed with prejudice, five cases were involuntarily dismissed, two cases were administratively stayed (one as a result of related criminal proceedings and one due to arbitration proceedings), and two were dismissed without prejudice.<sup>31</sup> Seven cases, all filed between 2020 and 2024, were still ongoing as of December 31, 2024.

### *Ross v. Jenkins*

In *Ross v. Jenkins*, the plaintiff and her mother joined a cult known as the United Nation of Islam (“UNOI”) when the plaintiff was just two years old.<sup>32</sup> At age eleven, UNOI forced the plaintiff to work at various UNOI businesses around the United States and as a domestic servant for no pay.<sup>33</sup> The forced labor continued for a decade.<sup>34</sup> After the plaintiff’s escape at age twenty-one, she sued her traffickers in a federal court in Kansas. In 2018, the court entered a default judgment awarding the plaintiff \$8,055,730.64.<sup>35</sup> This judgment, obtained by pro bono counsel, remains the largest damages verdict awarded to a single plaintiff under the TVPRA.



<sup>30</sup> This number includes default judgments, summary judgments, judgments on the pleadings, and judgments at trial.

<sup>31</sup> For purposes of this report, the involuntary dismissal category includes cases where the court granted a motion for dismiss or summary judgment in favor of the defendant.

<sup>32</sup> See Complaint at 16, *Ross v. Jenkins*, No. 2:17-cv-02547 (D. Kan. Sept. 15, 2017).

<sup>33</sup> See *id.* at 2-3.

<sup>34</sup> See *id.*

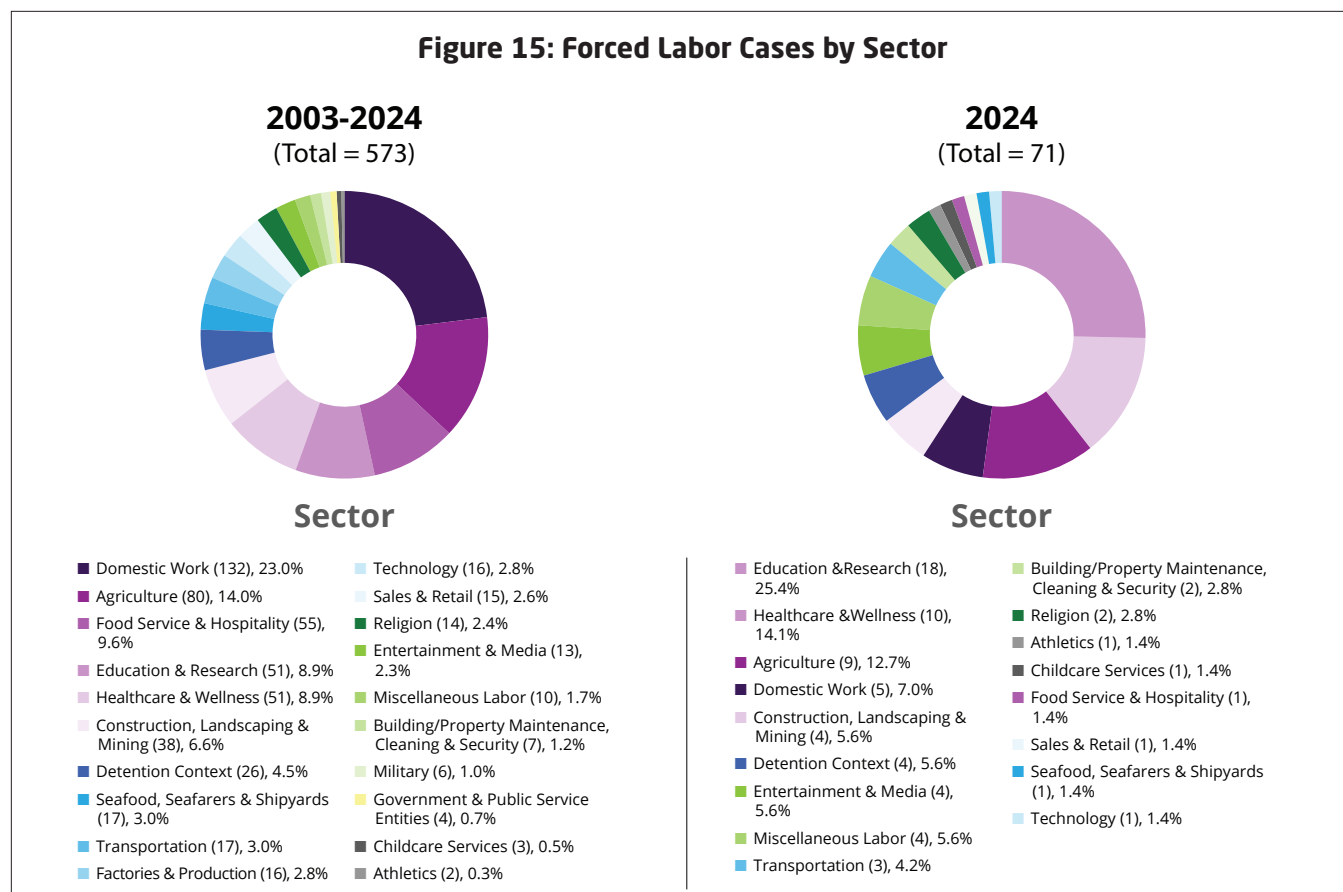
<sup>35</sup> See Judgment at 1-2, *Ross v. Jenkins*, No. 2:17-cv-02547 (D. Kan. May 23, 2018). This case was also criminally prosecuted. See *United States v. Majeed*, No. 2:21-cr-20060 (D. Kan.).

## IV. Forced Labor Cases from 2003 to 2024<sup>36</sup>

### A. Sectors in Forced Labor Cases from 2003 to 2024

Between 2003 and 2024, plaintiffs filed 573 cases involving allegations of forced labor—543 cases alleging forced labor and 30 cases alleging both forced labor and sex trafficking. The largest proportion of cases involving forced labor continued to be in the domestic work (23 percent), agriculture (14 percent), and food service and hospitality (nearly 10 percent) sectors. In 2024, plaintiffs filed a significant number of forced labor cases in the education and research (18) and healthcare and wellness (10) sectors. These filings resulted in the education and research sector becoming one of the top five sectors where forced labor cases were filed.

**Figure 15: Forced Labor Cases by Sector**

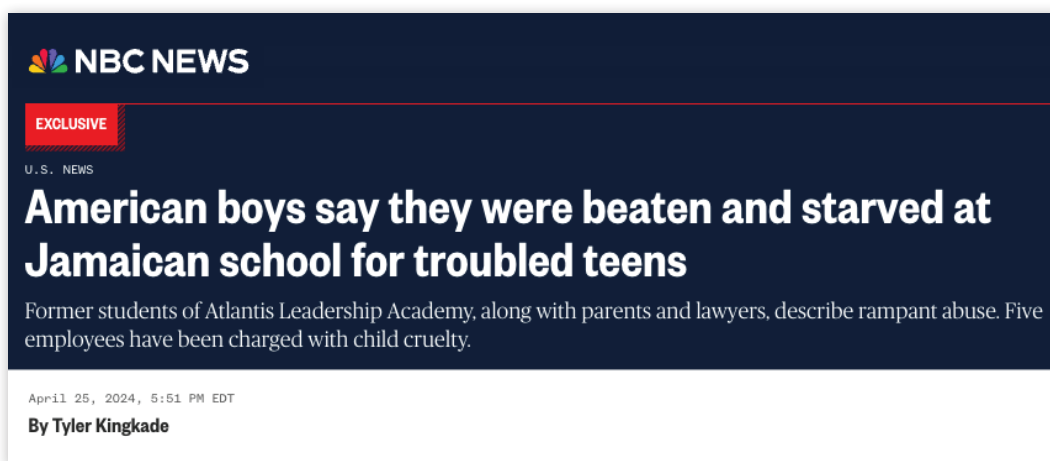


<sup>36</sup> The numbers in this section include cases that allege only forced labor and cases that allege both forced labor and sex trafficking unless otherwise noted.



**Figure 16: Sectors in Civil Forced Labor Cases (2003-2024)**

Sector	Types of Cases
Agriculture	Agriculture and farms
Athletics	Athletic and professional sports organizations
Building/Property Maintenance, Cleaning, and Security	Janitorial, maintenance, and security services for commercial buildings and other properties (i.e. parking garage)
Childcare Services	Childcare services in daycares and private households, including au pair, babysitting, and nannying
Construction, Landscaping, and Mining	Construction, gardening, landscaping, and mining
Detention Context	Civil detention, jail, prison, and other settings where an individual is held in custody or is not free to leave
Domestic Work	Domestic services include providing a variety of services in private households, including cleaning, cooking, and childcare
Education and Research	Academic institutions, boarding programs for teenagers and youth, research, and schools
Entertainment and Media	Film industry, adult entertainment, family-friendly entertainment, media and news network, music industry, performing arts, fashion and modeling, film industry, and tourism industry
Factories and Production	Factories and production, including the manufacturing and production of automobiles, clothing, food processing, medical products, and personal protective equipment
Food Service and Hospitality	Hotel, restaurant, bakery, country club, and cruise ship
Government and Public Service Entities	Emergency response services, foster care services, law enforcement, social work, and waste management services
Healthcare and Wellness	Hospitals and medical facilities, physical therapy, massage therapy, meditation and mindfulness practices, salons and spas, and special needs care services
Military	Military contractors, including mechanic, construction, food, janitorial, security, and translation services
Miscellaneous Labor	Art, animal care, personal assistant, and non-profit work
Religion	Religious organizations, cults, and spirituality organizations
Sales and Retail	Call center, gas station, grocery and convenience stores, and retail stores
Seafood, Seafarers, and Shipyards	Commercial fishing, maritime transportation, and seafood processing
Technology	Computer and software companies, information technology services companies, and engineering firms
Transportation	Air transportation, automotive repair or cleaning, and ground transportation



In 2024, defendants in the majority of cases in the education and research sector operated teen rehabilitation programs (17 of 18). These 17 cases marked a doubling of the total number of cases against teen programs (33), all of which were filed between 2020 and 2024. As of December 31, 2024, 20 teen program cases were ongoing, 10 were voluntarily dismissed with prejudice, two resulted in undisclosed settlements, and one was dismissed without prejudice. Most of the cases filed in 2024 were against Atlantis Leadership Academy (13 of 17). That entity, located in Jamaica but owned and operated by U.S. citizens, allegedly targeted U.S. residents as victims. For example, in *D.J. v. Forest Trail Academy, LLC*, the plaintiff alleged he was forced to work at a local restaurant and to do landscaping and cleaning for no pay while a student at Atlantis Leadership Academy.<sup>37</sup> He alleged that the defendants coerced his labor through beatings, physical assaults and torture, as well as deprivation of food and water.<sup>38</sup>

In 2023 and 2024, plaintiffs filed 10 cases each year alleging forced labor in the healthcare and wellness sector, bringing the total forced labor cases in this sector up to 51 cases. Foreign-born plaintiffs filed the majority of these cases (43). Nurses and physical therapists from the Philippines filed 81 percent of cases filed by foreign-born plaintiffs (35 of 43). In four cases, the plaintiff's country of origin could not be discerned from the public filings.

#### *Magtoles v. United Staffing Registry, Inc.*

In *Magtoles v. United Staffing Registry, Inc.*, the defendants recruited nurses from the Philippines to work at healthcare facilities in the United States using contracts with draconian penalties designed to coerce their labor.<sup>39</sup> A federal court in New York approved a class settlement in 2024, awarding the nurses \$1,649,483.51 in damages.<sup>40</sup>

<sup>37</sup> See Complaint at 15-17, *D.J. v. Forest Trail Acad., LLC*, No. 9:24-cv-81374 (S.D. Fla. Nov. 1, 2024).

<sup>38</sup> See *id.*

<sup>39</sup> See Complaint at 1-2, *Magtoles v. United Staffing Registry, Inc.*, No. 1:21-cv-01850 (E.D.N.Y. Apr. 6, 2021).

<sup>40</sup> See Final Order and Judgment at 1-2, *Magtoles v. United Staffing Registry, Inc.*, No. 1:21-cv-01850 (E.D.N.Y. Mar. 11, 2024).

**Figure 17: Forced Labor Cases by Sector (2003-2024)**

Sector	# of cases filed
Domestic Work	132
Agriculture	80
Food Service and Hospitality	55
Education and Research	51
Healthcare and Wellness	51
Construction, Landscaping, and Mining	38
Detention Context	26
Seafood, Seafarers, and Shipyards	17
Transportation	17
Factories and Production	16
Technology	16
Sales and Retail	15
Religion	14
Entertainment and Media	13
Miscellaneous Labor	10
Building/Property Maintenance, Cleaning, and Security	7
Military	6
Government and Public Service Entities	4
Childcare Services	3
Athletics	2
<b>Total</b>	<b>573</b>

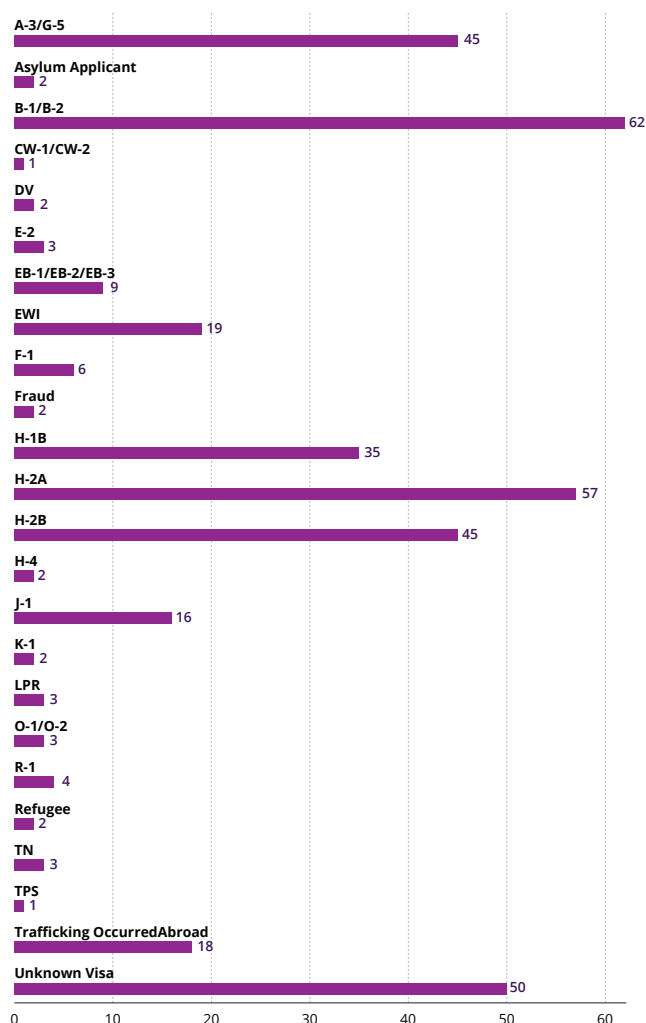
## B. Immigration and Visa Status in Forced Labor Cases from 2003 to 2024

The majority of civil trafficking cases brought by foreign-born plaintiffs alleged forced labor. Of the 449 cases filed by foreign-born plaintiffs between 2003 and 2024, 95 percent alleged forced labor (428).<sup>41</sup>

U.S. citizens also filed an increasing share of forced labor civil cases. By the end of 2023, U.S. citizens had filed 70 civil cases alleging forced labor, or nearly 17 percent of total forced labor cases where the immigration or visa status of the plaintiff was publicly disclosed (413). In 2024, U.S. citizens filed 20 cases involving forced labor. As a result, by the end of 2024, the percentage of forced labor cases filed by U.S. citizens had increased to over 19 percent (90 of 466). Of these 90 cases, plaintiffs filed the majority against the operators of teen rehabilitation programs (27), with 12 of these cases filed in 2024 alone.

Most foreign-born plaintiffs in forced labor cases entered the United States with a valid visa or other legal status. The defendant employers in these cases frequently misused legal immigration programs to abuse and exploit the workers. The three most common work visa categories used by traffickers to keep workers in forced labor were: visas for domestic workers employed by diplomats and international organization employees (A-3/G-5), temporary visas for agricultural workers (H-2A), and temporary visas for non-agricultural workers (H-2B).

**Figure 18: Plaintiff's Visa Type in Forced Labor Cases (2003-2024)<sup>42</sup>**



<sup>41</sup> This number does not include cases where the immigration or visa status of the plaintiff was unknown.

<sup>42</sup> In cases where it was clear from the documents that a visa was used but the type of visa is not specified, the case was categorized as "Unknown Visa." In contrast, where there was insufficient information as to how the plaintiff entered the country to determine whether a visa was involved, the case was categorized as "Unknown."

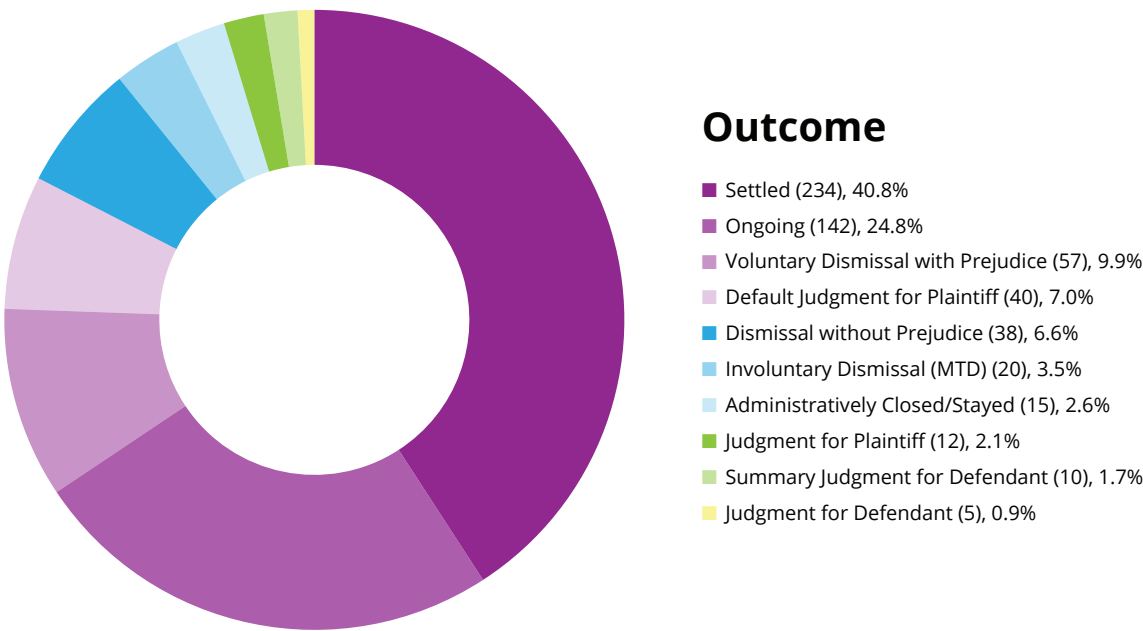
**Figure 19: Visa/Immigrant Status Types in Forced Labor Cases (2003-2024)**

Type	Recipients	# of labor cases	% of total labor cases
A-3/G-5	Domestic workers of foreign diplomats or employees of international organizations	45	11.9%
Asylum Applicant	Plaintiff requested asylum upon entering the United States	2	0.5%
B-1/B-2	Visitors for business or tourism and domestic workers	62	16.4%
CW-1/CW-2	CNMI-only transitional workers	1	0.3%
DV	Diversity Immigrant Visa recipients	2	0.5%
E-2	Investors in U.S. businesses	3	0.8%
EB-1/EB-2/EB-3	Persons of extraordinary ability in the sciences, arts, education, business, or athletics	9	2.4%
EWI	Plaintiff entered the United States without inspection	19	5.0%
F-1	Student Visa holders	6	1.6%
Fraud	Plaintiff entered the United States with another individual's documentation	2	0.5%
H-1B	Highly skilled specialized workers	35	9.3%
H-2A	Seasonal agricultural workers	57	15.1%
H-2B	Temporary non-agricultural workers	45	11.9%
H-4	Dependent family members of H-1B, H-1B1, H-2A, H-2B, and H-3 visa holders	2	0.5%
J-1	Cultural and educational exchange program participants	16	4.2%
K-1	Nonimmigrant Visa for a fiancé(e)	2	0.5%
LPR	Long-Term Permanent Residents	3	0.8%
O-1/O-2	Individuals with extraordinary ability or achievement	3	0.8%
R-1	Nonimmigrant religious workers	4	1.1%
Refugee	Plaintiff entered the United States as a refugee	2	0.5%
TN	Nonimmigrant NAFTA professionals	3	0.8%
TPS	Temporary Protected Status recipients	1	0.3%
Trafficking Occurred Abroad	Victims of trafficking occurring outside the United States	18	4.8%
Unknown Visa	Immigrants with an unknown visa classification	50	13.3%

## C. Outcomes in Forced Labor Cases from 2003 to 2024

As of December 31, 2024, nearly 50 percent of all forced labor cases filed have resulted in favorable outcomes for plaintiffs. Specifically, almost 41 percent of the forced labor cases (234) resulted in settlements, and courts decided nine percent of cases (52) in favor of the plaintiffs through default judgment, judgment on the pleadings, or judgment at trial. Conversely, federal courts decided just over six percent of cases (35) in favor of the defendants through involuntary dismissals, judgment on the pleadings, or judgment at trial. In addition, courts dismissed more than six percent (38) of cases without prejudice, enabling plaintiffs the opportunity to refile their claims.

**Figure 20: Forced Labor Cases by Outcome (2003-2024)**  
(Total = 573)



The largest award for plaintiffs in 2024 resulted from a settlement in *Doe v. MasterCorp Inc.*, a forced labor case. MasterCorp staffed over 200 Colombian nationals as housekeepers at hotel and resort properties across the United States.<sup>43</sup> The housekeepers performed cleaning services under onerous


<sup>43</sup> See Amended Complaint at 1, *Doe v. MasterCorp Inc.*, No. 1:24-cv-00678 (E.D. Va. May 13, 2024).


working conditions for 12 to 15 hours per day.<sup>44</sup> MasterCorp did not pay the workers overtime wages and housed the workers in crowded motel rooms.<sup>45</sup> The workers faced threats and penalties of at least \$1,500 in wage deductions if they complained about the conditions of employment or sought to leave.<sup>46</sup> MasterCorp also threatened them with immigration-related consequences.<sup>47</sup> In 2024, a federal court in Virginia approved the settlement agreement with MasterCorp, awarding plaintiffs over \$6.6 million.<sup>48</sup>

In total, plaintiffs won \$15,082,114.25 in damages and public settlements in forced labor cases in 2024. As of December 31, 2024, federal courts had awarded a total of \$427,030,175.83 in damages involving allegations of forced labor in cases filed since 2003.


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## MasterCorp, Workers Seek Approval of \$4.95 Million Settlement

April 25, 2024, 5:26 PM EDT

 **Mike Vilensky**  
Senior Correspondent 



A worker prepares a bed in a hotel guest room.  
Photographer: Simon Dawson/Bloomberg via Getty Images

<sup>44</sup> See *id.*

<sup>45</sup> See *id.*

<sup>46</sup> See *id.*

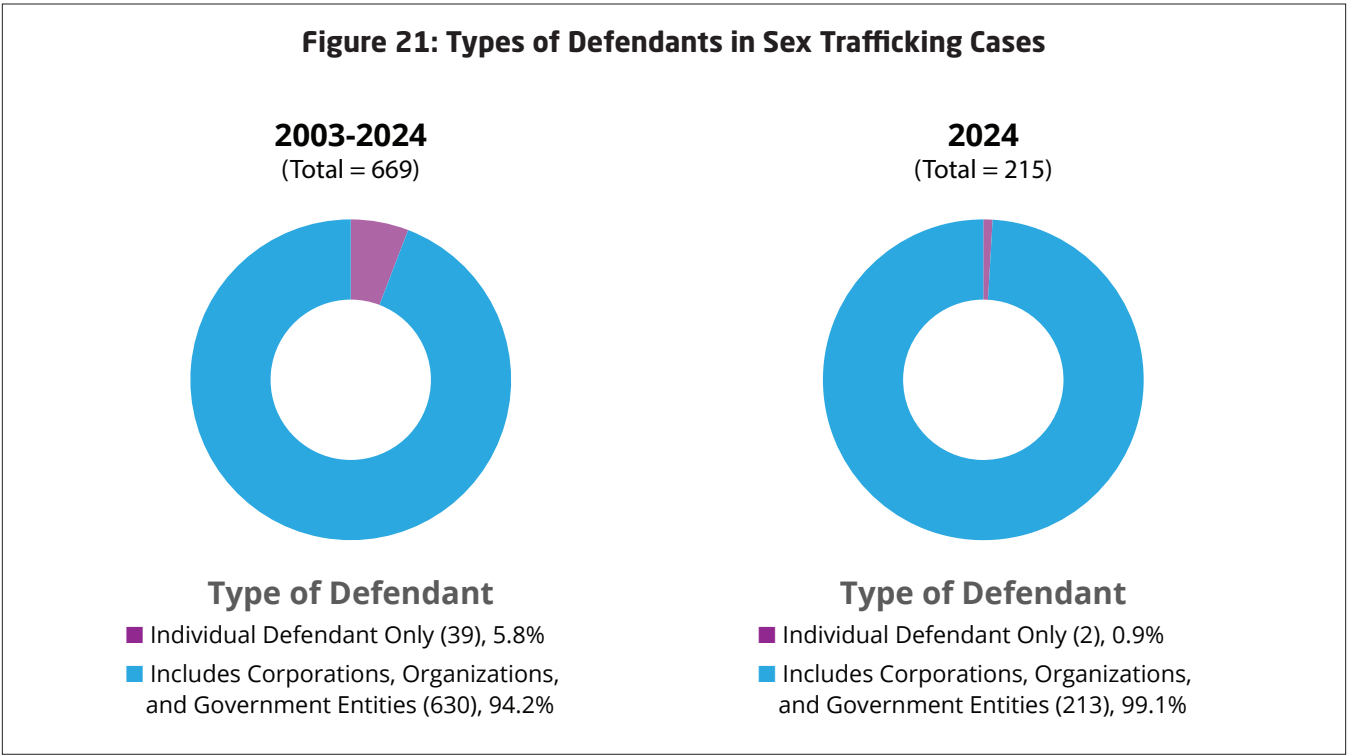
<sup>47</sup> See *id.*

<sup>48</sup> See Final Order and Judgment at 1-2, *Doe v. MasterCorp Inc.*, No. 1:24-cv-00678 (E.D. Va. Dec. 27, 2024).

# V. Sex Trafficking Cases from 2003 to 2024<sup>49</sup>

## A. Types of Defendants in Sex Trafficking Cases from 2003 to 2024

In 2024, plaintiffs filed 215 civil cases alleging sex trafficking. Almost all of these cases (213 of 215)—99 percent—involved at least one corporate or institutional defendant, including hotels, motels, hospitality franchises, banks, and internet service providers. Only two cases named individuals as the sole defendants. The defendants sued in sex trafficking case filings in 2024 pushed the total proportion of civil sex trafficking cases brought against corporate and institutional defendants to 94 percent, up from about 91 percent at the end of 2023.



<sup>49</sup> The numbers in this section include cases alleging only sex trafficking, as well as cases alleging both forced labor and sex trafficking unless otherwise noted.



Plaintiffs filing sex trafficking cases in 2024 primarily targeted hotels and the hospitality industry. Plaintiffs filed 174 cases against hotels in 2024, compared to 40 cases against other corporate and institutional defendants. As of December 31, 2024, plaintiffs had filed 63 percent of all civil cases involving allegations of sex trafficking against hotels, an increase from 55 percent at the end of 2023.

Internet service providers remained the next largest category of corporate defendants in sex trafficking civil cases, but plaintiffs filed just one new civil case against an internet service provider in 2024. In contrast, the number of sex trafficking cases filed against entertainment and media companies and individuals involved in the entertainment industry increased significantly over the last two years. In 2023 and 2024, plaintiffs filed a combined 13 cases against defendants in the entertainment and media industry, doubling the number of total cases filed against defendants in this industry since 2003. Plaintiffs filed five of these cases against Sean “Diddy” Combs and related companies. Plaintiffs filed the first civil sex trafficking suit against Combs in 2023. Federal

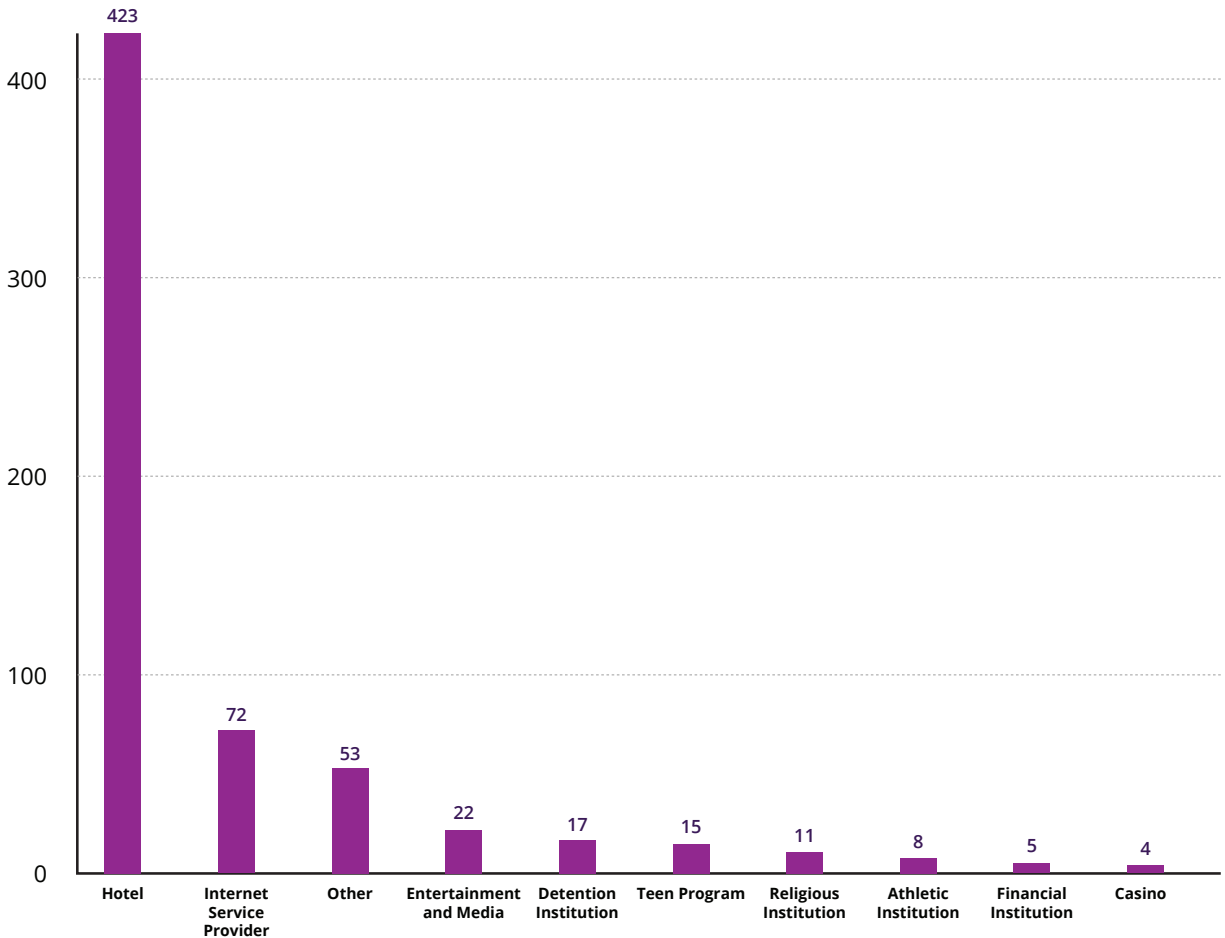
criminal charges followed. In September 2024, federal prosecutors charged Combs with criminal violations of the TVPRA.<sup>50</sup> Similarly, in October 2023, a plaintiff filed a civil action including allegations of sex trafficking against Abercrombie & Fitch and its former Chief Executive Officer Michael Jeffries. A year later, federal prosecutors criminally charged Jeffries with sex trafficking and other offenses.<sup>51</sup>



<sup>50</sup> *United States v. Combs*, No. 1:24-cr-00542 (S.D.N.Y.).

<sup>51</sup> Jeffries was subsequently found incompetent to stand trial. *See supra* note 10.

**Figure 22: Types of Corporate and Institutional Defendants in Sex Trafficking Cases (2003-2024)**

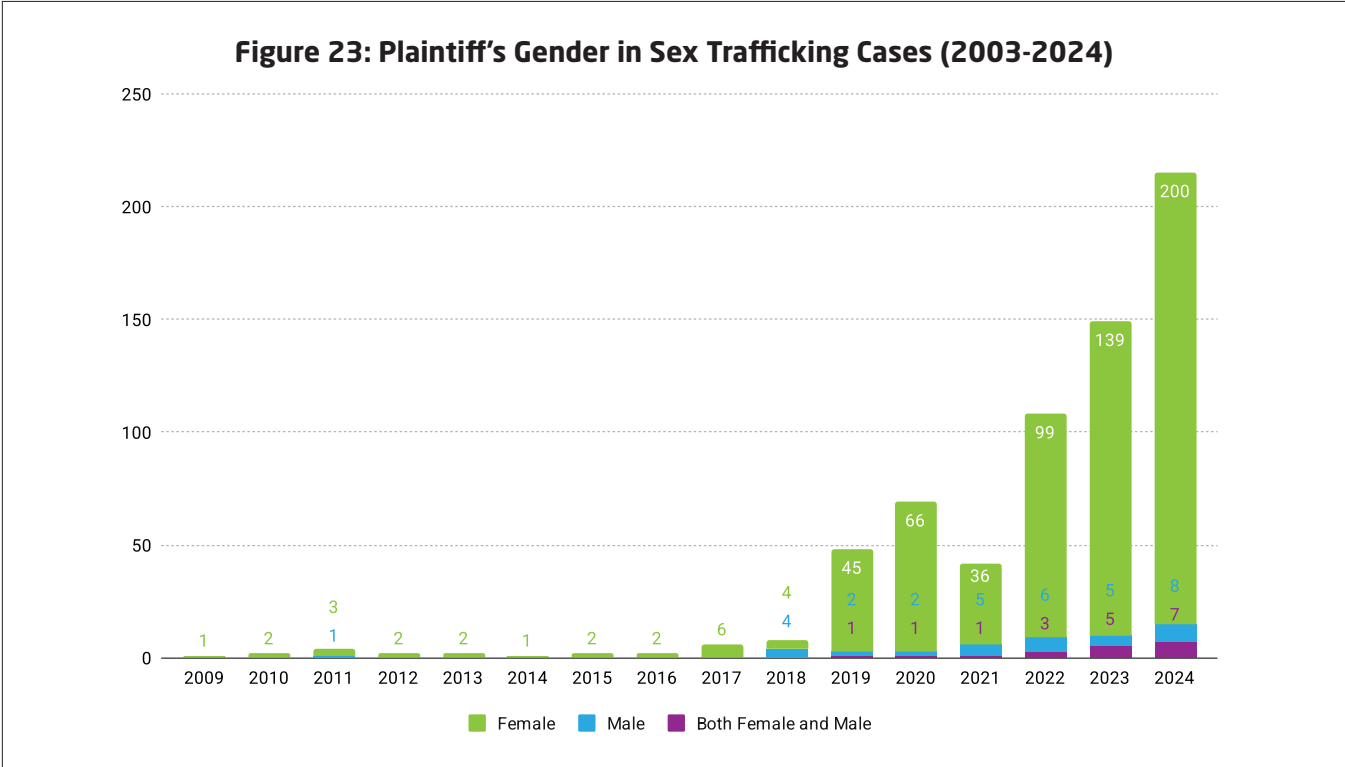


## B. Plaintiffs in Sex Trafficking Cases from 2003 to 2024

The majority of plaintiffs in sex trafficking cases are female, but recently the number of cases filed by male plaintiffs has begun to rise.<sup>52</sup> Between 2003 and 2017, only one sex trafficking case involved a male plaintiff. Male plaintiffs filed four sex trafficking cases in 2018 and three sex trafficking cases each year in 2019 and 2020. The following year, the number of cases filed by male plaintiffs began to rise from six in 2021 to 15 in 2024. As of December 31, 2024, male plaintiffs had filed 51 cases alleging sex trafficking, all but one filed in the last seven years. Plaintiffs have brought these cases against several

<sup>52</sup> To the best of our knowledge, no plaintiff who identified as transgender has filed a civil sex trafficking case.

types of defendants, including the operators of teen programs, internet service providers, individuals and companies in the entertainment and media industry, and religious institutions.



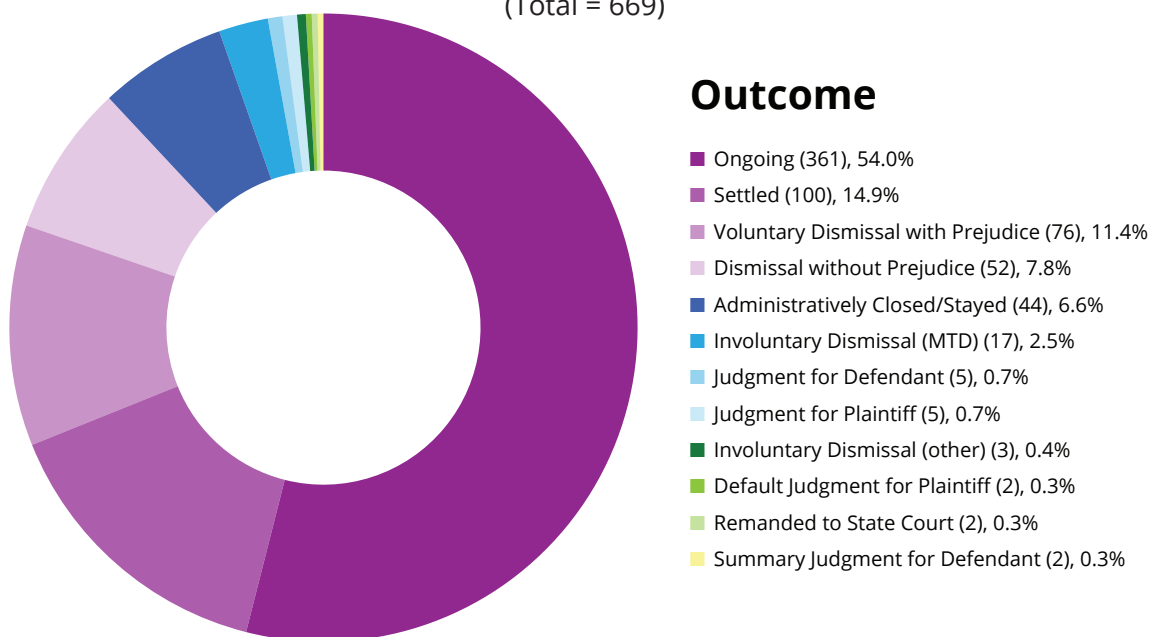
### C. Outcomes in Sex Trafficking Cases from 2003 to 2024

With the record-breaking number of sex trafficking case filings in recent years, more than fifty percent of sex trafficking cases filed were ongoing as of the end of 2024 (361). Of the 669 sex trafficking cases filed as of December 31, 2024, 308 cases ended. Of those 308 cases, nearly 35 percent resulted in favorable outcomes for plaintiffs (107). Nearly all of those favorable outcomes were settlements (100). Courts decided seven cases in favor of the plaintiffs through default judgment, summary judgment, judgment on the pleadings, or judgment at trial. Of the 100 cases that resulted in a settlement, 94 of those settlements were confidential. All of the settlements in sex trafficking cases in 2024 were confidential.

Of the 308 sex trafficking cases resolved since 2003, fewer than nine percent resulted in unfavorable outcomes for plaintiffs (27). This category includes involuntary dismissals and judgments for defendants on the pleadings or at trial. Courts have also ordered approximately 17 percent of cases (52) dismissed without prejudice, an outcome that provided plaintiffs with the opportunity to refile their claims. Overall, of the sex trafficking cases that were resolved by the end of 2024, more resulted in favorable outcomes for plaintiffs than unfavorable ones.

**Figure 24: Sex Trafficking Cases by Outcome (2003-2024)**

(Total = 669)



As previously noted, plaintiffs have filed 423 cases involving allegations of sex trafficking against corporate defendants in the hotel and hospitality industry since 2003. As of December 31, 2024, 62 percent of these cases remained ongoing (264 of 423). Of the 159 sex trafficking cases against hotels that resolved between 2003 and 2024, 70 percent settled or were voluntarily dismissed with prejudice. Specifically, nearly 41 percent settled (66) and nearly 29 percent were voluntarily dismissed with prejudice (46).<sup>53</sup>

Of the sex trafficking cases against hotels that ended in settlement or a voluntary dismissal with prejudice, the majority took 24 months or less to reach their conclusion. Specifically, 10 cases settled or were voluntarily dismissed with prejudice in zero to six months (9 percent), 20 cases in six to 12 months (18 percent), 19 cases in 12 to 18 months (17 percent), 26 cases in 18 to 24 months (23 percent), and 37 cases after 24 months (33 percent).

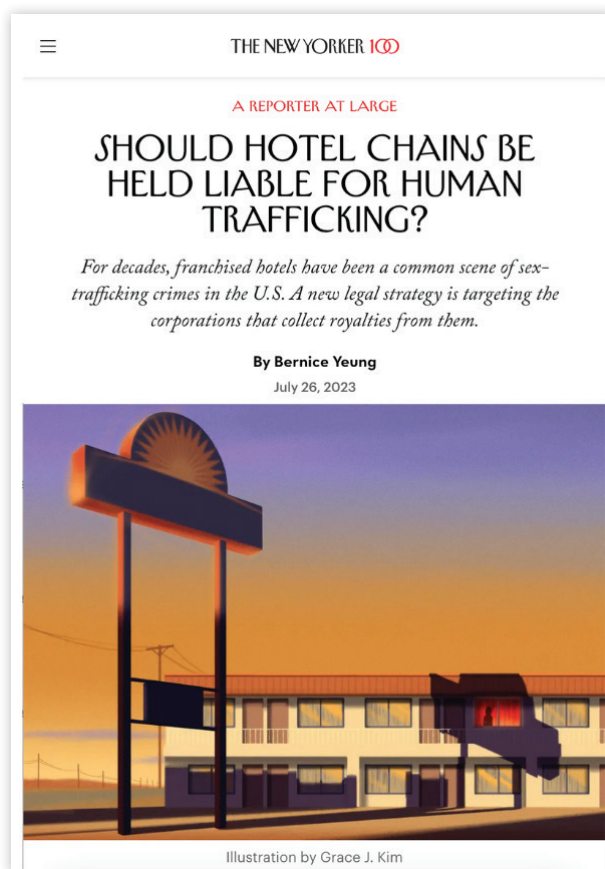
All of the settlements that occurred in 2024 in sex trafficking cases filed against hotels and the hospitality industry were confidential. Since 2003, there has been just one sex trafficking case against a

<sup>53</sup> As noted earlier, a voluntary dismissal with prejudice is often a result of a confidential settlement, although it is not a definitive indication that a case settled.

corporate hotel defendant with a publicly disclosed settlement amount.<sup>54</sup> The case ended with a settlement of \$100,000. Of the 66 sex trafficking cases that reached a settlement with corporate hotel defendants, 65 settled on confidential terms, more than 98 percent. As a result, it is not possible to discern the extent to which sex trafficking survivors suing hotels are receiving meaningful damages awards in these cases. This percentage is high compared to the number of confidential settlements among all civil trafficking cases. Out of 332 civil trafficking cases that ended in settlement between 2003 and 2024, 263 of those settlements were confidential, or 79 percent.

The majority of sex trafficking cases against internet service providers remained ongoing or administratively stayed as of December 31, 2024 (53 of 72 cases).<sup>55</sup> For the 35 cases that courts have administratively stayed, 30 cases involving Salesforce were stayed after the court consolidated the cases and five cases against Backpage were stayed due to a pending criminal action. There were no significant new outcomes in these cases.

In 2024, plaintiffs obtained awards of \$1,305,344.00 in public settlements and damages in cases alleging sex trafficking. In the aggregate, plaintiffs have won a total of \$518,846,831.95 in damages through public settlements and judgments in sex trafficking cases. It should be noted, however, that \$365,000,000 of that total is a result of two settlements connected with Jeffrey Epstein's sex trafficking venture.<sup>56</sup>



<sup>54</sup> In that settlement, the plaintiff received \$100,000. See Consent Judgment, *J.C. v. Yash Luv, LLC*, No. 1:22-cv-00846 (N.D. Ga. Feb. 24, 2023).

<sup>55</sup> The defendants in this category include Backpage, Mailchimp, Craigslist, Kik, Salesforce, MindGeek (owner of MG Freesites doing business as Pornhub), Twitter, WebGroup Czech Republic (owner of websites including XVideos), Reddit, Grindr, Omegle, Meta, Snap, Fenix Internet (owner of OnlyFans), Google, Telegram, Scruff, and Secure Live Media (owner of Camsoda).

<sup>56</sup> See *Doe v. JPMorgan Chase Bank*, No. 1:22-cv-10019 (S.D.N.Y.) (settled for \$290,000,000.00); *Doe v. Deutsche Bank Aktiengesellschaft*, No. 1:22-cv-10018 (S.D.N.Y.) (settled for \$75,000,000.00).

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## VI. Conclusion

In 2024, trafficking survivors continued to turn to the TVPRA to seek justice, filing a record number of cases. The surge in sex trafficking cases continued in 2024. Forced labor cases also increased significantly. For the last five years, the number of plaintiffs filing sex trafficking cases has grown at an extraordinary rate. This rise is driven predominantly by cases filed against the hotel and hospitality industry. Plaintiffs have also filed an increased number of cases involving the entertainment and media industry against high-profile defendants. Although the sex trafficking cases are generally surviving motions to dismiss, the real impact on the survivors is difficult to discern given the confidential nature of the settlements. In 2024, survivors of sex trafficking won \$1,305,344.00 in publicly disclosed settlements and judgments.



The historic highs of 2024 were not limited to cases involving sex trafficking. Plaintiffs also filed a record number of forced labor cases. As the number of cases filed has risen, so too have the categories of defendants. Plaintiffs have filed forced labor cases in 20 different types of sectors, ranging from domestic work to seafood processing. Plaintiffs nearly doubled the number of cases filed

against the operators of teen rehabilitation programs in 2024, exposing the allegations of abuse inflicted.

Survivors of forced labor have used strategic litigation to demand systemic change in employment practices, in addition to fighting for damages. In 2024, forced labor survivors obtained awards of more than \$15 million in publicly disclosed settlements and judgments across 16 cases.

For more than twenty years, trafficking survivors and their attorneys, many of them pro bono, have built the civil remedy of the TVPRA as one of the most important tools to demand accountability. The TVPRA has allowed plaintiffs to file civil cases against corporate and institutional defendants, as well as other high-profile defendants. Trafficking survivors have demonstrated remarkable courage and resilience in confronting their traffickers in federal court. Trafficking survivors have demanded an end to impunity. And they are winning.

# VII. Appendices

## Appendix A: Cases Filed by State/Territory

As of December 31, 2024, plaintiffs had filed federal civil human trafficking cases in 47 states, the District of Columbia, and two territories. In 2024, plaintiffs filed the first civil trafficking case in Nebraska. But, as of December 31, 2024, no trafficking cases had ever been filed in Delaware, Guam, Montana, Puerto Rico, and Vermont. Besides Nebraska, five states—Hawaii, Idaho, New Hampshire, Rhode Island, and West Virginia—tied for having the lowest number of cases filed, with one trafficking case filed in federal court in each of these states. Of the states with cases filed, plaintiffs brought the highest number in New York (177), Texas (149), Florida (128), California (108), Georgia (91), and Ohio (83).

Number of Cases Filed Under 18 U.S.C. § 1595 by State/Territory (2003-2024)									
State	#	State	#	State	#	State	#	State	#
Alabama	12	Hawaii	1	Massachusetts	15	New York	177	South Dakota	3
Alaska	4	Idaho	1	Michigan	15	North Carolina	14	Tennessee	15
Arizona	4	Illinois	22	Minnesota	13	North Dakota	4	Texas	149
Arkansas	16	Indiana	14	Mississippi	4	Northern Mariana Islands	4	U.S. Virgin Islands	3
California	108	Iowa	6	Missouri	23	Ohio	83	Utah	7
Colorado	25	Kansas	3	Nebraska	1	Oklahoma	5	Virginia	32
Connecticut	15	Kentucky	11	Nevada	12	Oregon	15	Washington	16
District of Columbia	22	Louisiana	15	New Hampshire	1	Pennsylvania	18	West Virginia	1
Florida	128	Maine	3	New Jersey	32	Rhode Island	1	Wisconsin	5
Georgia	91	Maryland	23	New Mexico	3	South Carolina	13	Wyoming	4



## Appendix B: Total Damages in Federal Civil Trafficking Cases

In 2024, plaintiffs won \$16,325,458.25 in damages through judgments and public settlement agreements in 18 separate cases. Between 2003 and 2024, plaintiffs won \$941,872,141.83 through Section 1595 civil lawsuits. The amounts set forth below do not include confidential settlements, where the amount agreed upon is not publicly available.

Total Damages in Federal Civil Trafficking Cases (2003-2024) <sup>57</sup>		
Year Cases Closed	Total Damages Awarded	Number of Cases Resolved with Known Damages
2003	\$0.00	-
2004	\$0.00	-
2005	\$0.00	-
2006	\$285,433.20	1
2007	\$15,000.00	1
2008	\$8,770,374.05	2
2009	\$9,000,966.58	3
2010	\$500,000.00	1
2011	\$3,538,445.72	3
2012	\$19,789,838.93	7
2013	\$11,288,427.29	9
2014	\$732,562.24	2
2015	\$15,345,951.00	5
2016	\$18,269,298.71	11
2017	\$13,840,753.94	7
2018	\$9,088,943.62	7
2019	\$66,038,495.59	11
2020	\$184,447,070.68	7
2021	\$14,427,179.87	11
2022 <sup>58</sup>	\$30,992,408.07	12
2023 <sup>59</sup>	\$519,175,534.09	10
2024	\$16,325,458.25	18
<b>Total</b>	<b>\$941,872,141.83</b>	<b>128</b>

<sup>57</sup> The total damages awards include attorneys' fees and costs.

<sup>58</sup> The total damages awarded for 2022 has been updated to include a \$1,968,200.35 jury verdict for the plaintiff in *Treadway v. Otero*, No. 2:19-cv-00244 (S.D. Tex.) (appeal resolved in 2024 affirming the verdict).

<sup>59</sup> Two large settlements connected to Jeffrey Epstein's sex trafficking venture made up the bulk of the damages awarded for 2023. *See supra* note 56 and accompanying text.



## Appendix C: Civil Cases Filed by Type and Year

Civil Cases Filed by Year and Type (2003-2024)				
Year	Sex Trafficking	Forced Labor	Both	Total
2003	-	-	-	0
2004	-	6	-	6
2005	-	6	-	6
2006	-	2	-	2
2007	-	9	-	9
2008	-	17	-	17
2009	1	15	-	16
2010	2	20	-	22
2011	4	25	-	29
2012	1	17	1	19
2013	4	30	-	34
2014	1	27	-	28
2015	2	24	-	26
2016	1	26	1	28
2017	6	32	-	38
2018	8	28	-	36
2019	47	39	1 <sup>60</sup>	87
2020	67	30	2	99
2021	43*	41	1	85
2022	107* <sup>61</sup>	36	4	147
2023	136*	48*	14	198
2024	209	65	6	280
<b>Total</b>	<b>640</b>	<b>543</b>	<b>30</b>	<b>1,212</b>

\* These numbers have been updated to reflect cases that had not been previously identified.

<sup>60</sup> One case involving both forced labor and sex trafficking was excluded from the data set because it was filed under 18 U.S.C. § 2255, not Section 1595. See *supra* note 2.

<sup>61</sup> Five cases involving sex trafficking were excluded from the data set because they were not filed under or based on Section 1595. See *supra* note 2.



#### About The Human Trafficking Legal Center

The Human Trafficking Legal Center is a bridge to justice, connecting trafficking survivors to pro bono representation and demanding accountability from traffickers, from governments, and from corporations. We shine a light on the system failures that allow trafficking to flourish. We advocate for survivors as agents of change and as leaders in the movement. We fight for systems change to end forced labor, including forced labor in global supply chains.

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