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**The Human Trafficking Legal Center Files Amicus Brief Urging the Ninth Circuit to Reverse Dismissal of Idaho Labor Trafficking Case**

WASHINGTON, D.C. – On October 3, 2019, the Human Trafficking Legal Center, represented by Hunton Andrews Kurth LLP, filed an [amicus brief](#) urging the United States Court of Appeals for the Ninth Circuit to reverse a district court’s erroneous dismissal of the labor trafficking claims of six Mexican veterinarians in *Martinez-Rodriguez v. Giles*, 391 F. Supp. 3d 985 (D. Idaho 2019).

The amicus brief argues that the district court’s opinion misapplied the Trafficking Victims Protection Reauthorization Act (TVPRA), undermining Congress’s efforts to protect trafficking victims. These errors not only led the district court to deprive plaintiffs of their right to a jury trial, but also undercut settled federal trafficking law. The published district court opinion, if followed by other courts, will hobble the effectiveness of the TVPRA.

“Adopting the district court’s flawed reasoning will greatly undermine federal legal protections for trafficking victims and provide unscrupulous employers a roadmap to keep victims in forced labor,” said Sarah L. Bessell, Senior Staff Attorney at the Human Trafficking Legal Center. “The district court refashioned the plaintiffs’ forced-labor claims into a run-of-the-mill commercial dispute. But threats of deportation make this more than just a ‘bad job.’”

The Human Trafficking Legal Center’s data indicate that cases alleging forced labor in the agricultural sector are the second most common category of civil human-trafficking litigation brought in the federal courts. [See our report: \*Federal Human Trafficking Civil Litigation: 15 Years of the Private Right of Action\*](#). The facts alleged in the *Martinez-Rodriguez* case are typical of human trafficking and forced-labor cases nationwide. Plaintiffs, qualified veterinarians, entered the United States on legal visas for skilled workers. But instead of veterinary work, defendants allegedly demanded that the plaintiffs do low-skilled, intense physical labor. The veterinarians alleged that defendants controlled their movements, changed the terms of their employment, and threatened them with deportation to enforce obedience. Plaintiffs arrived in rural Idaho completely dependent on defendant Funk Dairy; they knew no one in the area; most spoke no English. Women were allegedly told that they were not allowed to have male visitors. Defendants allegedly subjected the veterinarians to 12 hours or more of intense physical labor, six days a week, denying them breaks to use the bathroom or to have lunch or dinner. The veterinarians further alleged that Funk Dairy employees regularly entered and searched their work-provided housing without advance warning or permission.

The Human Trafficking Legal Center amicus brief asks the Ninth Circuit to reverse the lower court decision and to apply the Trafficking Victims Protection Reauthorization Act in accordance with Congress's goal to eradicate human trafficking. Adopting the district court's reasoning risks denying relief to countless victims of trafficking.

The Human Trafficking Legal Center thanks pro bono counsel at Hunton Andrews Kurth LLP, and particularly partner Stuart Raphael, for representing it in this important case.

Read the entire brief [here](#).

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*The Human Trafficking Legal Center connects human trafficking survivors with highly-skilled pro bono attorneys nationwide. We hold traffickers accountable for their crimes through civil litigation and criminal restitution. The Human Trafficking Legal Center maintains databases of civil and criminal federal trafficking cases filed in the United States. The organization conducts in-depth research on human trafficking trends and victims' rights. For more information, please visit [www.htlegalcenter.org](http://www.htlegalcenter.org).*

*Led by two former state solicitors general and a former justice of the Supreme Court of Texas, lawyers on the issues and appeals team at Hunton Andrews Kurth LLP have represented clients in federal and state appellate courts nationwide, including in the Supreme Court of the United States. Among the firm's lawyers are a former justice of the Supreme Court of Virginia and more than 30 who have clerked for federal and state appellate judges throughout the country.*