



Using Civil Litigation to Combat Human Trafficking

Federal Human Trafficking Civil Litigation

2025 Data Update

Acknowledgments

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I. Introduction

In December 2003, Congress enacted the Trafficking Victims Protection Reauthorization Act (“TVPRA”), which amended federal law to open a path for trafficking survivors to recover civil damages from their traffickers in federal courts. The civil private right of action, codified at 18 U.S.C. § 1595 (“Section 1595”), has since become a key tool for survivors seeking to hold their traffickers accountable through litigation.

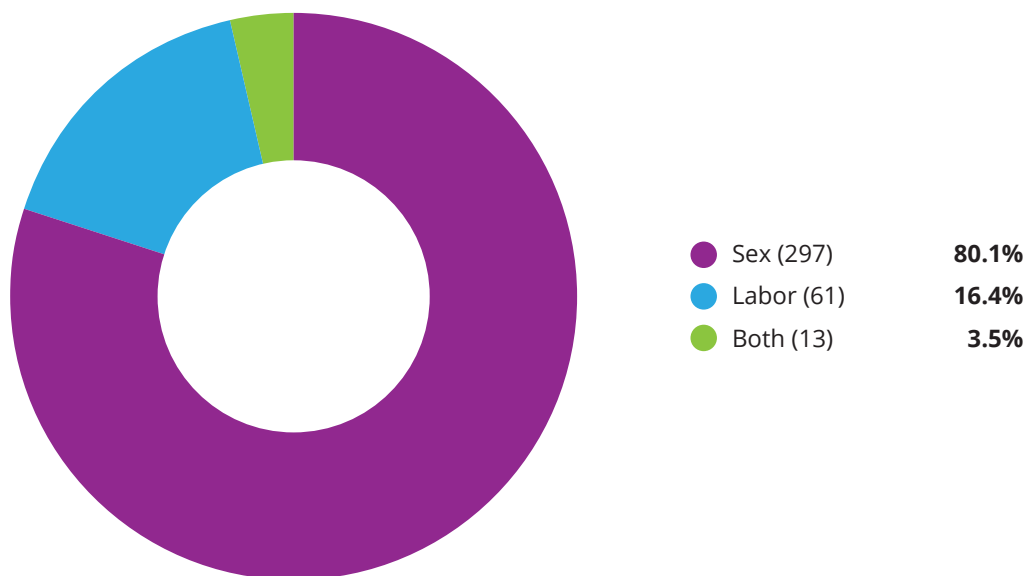
Between December 19, 2003, the date that federal civil cases became possible to file under the TVPRA, and December 31, 2025, plaintiffs filed a total of 1,629 civil trafficking cases in federal courts.¹ In 2025, new case filings continued to rise exponentially. Plaintiffs filed 371 new cases, more than in any other year. Notably, in 2025, plaintiffs crossed the \$1 billion threshold in damages awards and public settlements under the TVPRA.

The Human Trafficking Legal Center maintains a database of every forced labor and sex trafficking civil case filed under the TVPRA since 2003. At the close of 2025, the database contained 612 cases alleging only forced labor, 975 cases alleging only sex trafficking, and 42 cases alleging both forced labor and sex trafficking.² This report analyzes the federal civil trafficking cases filed since the enactment of the civil remedy in 2003 through December 31, 2025.

II. Year at a Glance: 2025 Federal Civil Trafficking Cases

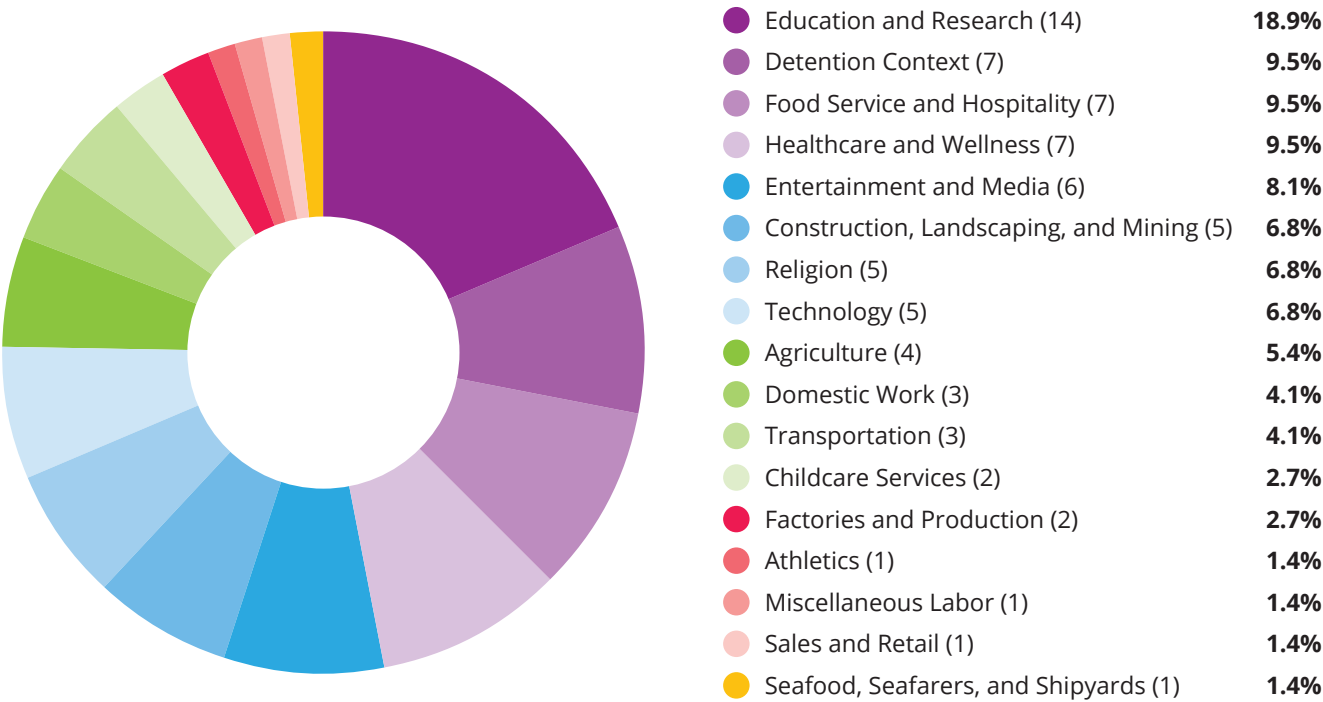
In 2025, plaintiffs filed a record number of civil cases under the TVPRA for the fourth year in a row. Plaintiffs brought 371 cases alleging violations of federal trafficking laws, surpassing the previous record in 2024 of 304 cases filed. Cases involving sex trafficking remained the primary driver of this increase in filings. Of the 371 new cases filed, 297 alleged only sex trafficking, 61 alleged only forced labor, and 13 alleged both sex trafficking and forced labor. While sex trafficking allegations accounted for the majority of new filings, the number of cases alleging forced labor remained steady at 74 in 2025, compared to 75 in 2024.

Figure 1: Civil Cases Filed by Type (2025) (Total = 371)



Of the 74 cases that included forced labor allegations, the education and research sector generated the most filings, with 14 such cases. Eleven of those cases involved operators of teen rehabilitation programs, continuing a pattern first identified in 2023.³

Figure 2: Forced Labor Cases by Sector* (2025) (Total = 74)

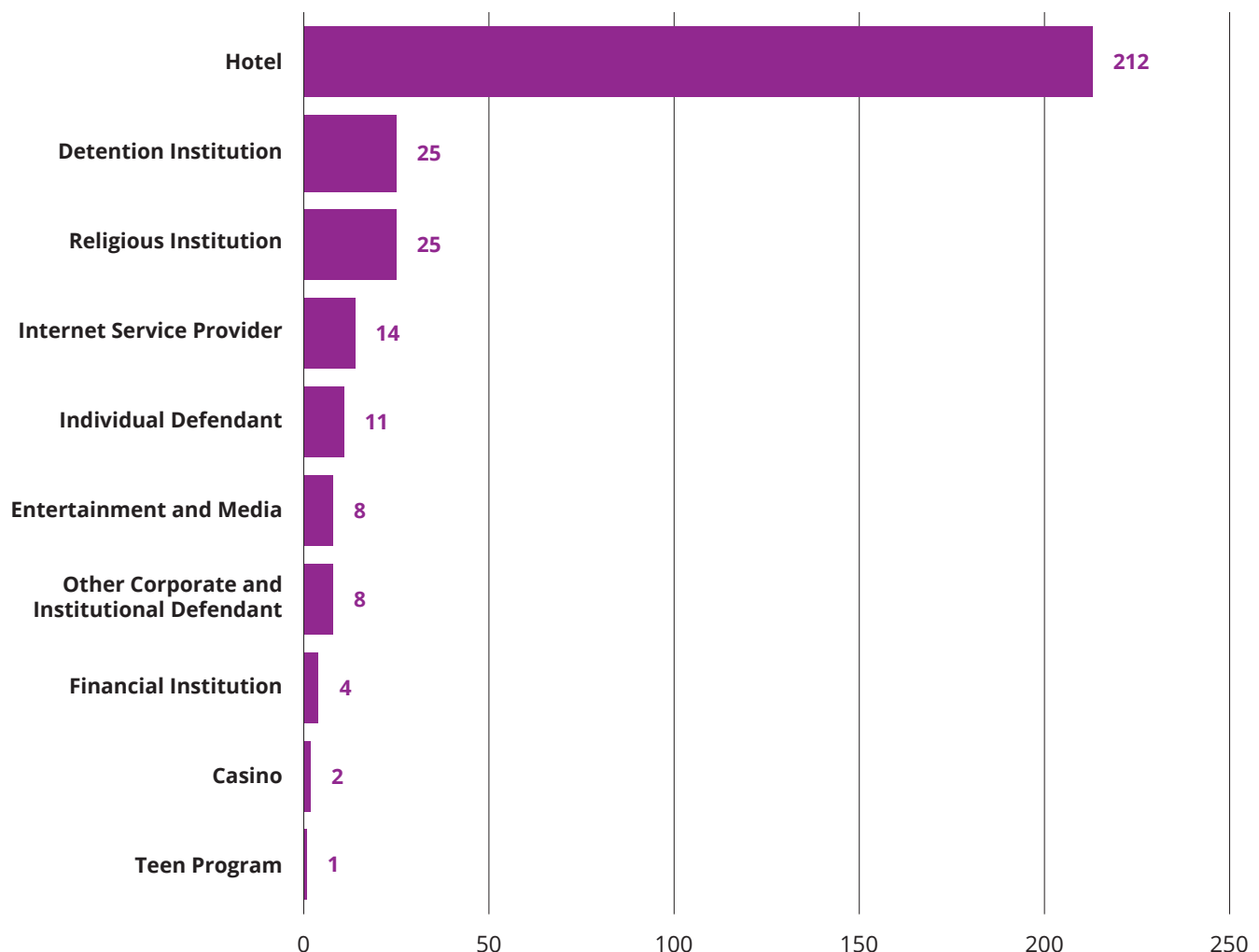


**"Sector" refers to the actual sector or industry in which the plaintiff was forced to work. See Appendices: Sector Definitions in Forced Labor Cases for a list of case types included in each sector.



In all, 310 of the total 371 cases filed in 2025 included sex trafficking allegations. Sex trafficking cases brought against hotels and the hospitality industry continued to account for the largest share of cases, at over 68 percent (212 cases). Plaintiffs filed more sex trafficking cases against hotels in 2025 than in any other year, including 2024, when plaintiffs filed 175 cases. There was significant filing activity against religious institutions and in the detention context as well, with 25 cases each. Twenty-two of the 25 cases against religious institutions involved allegations against a church in California, Harvest Christian Fellowship, and related individuals. Similarly, 22 of the 25 cases in the detention context involved allegations of sex trafficking and other sexual abuse arising out of federal correctional institutions, primarily Federal Correctional Institution Dublin (“FCI Dublin”), a women-only prison in Dublin, California, that closed in 2024.

Figure 3: Sex Trafficking Cases by Type of Defendant (2025) (Total = 310)

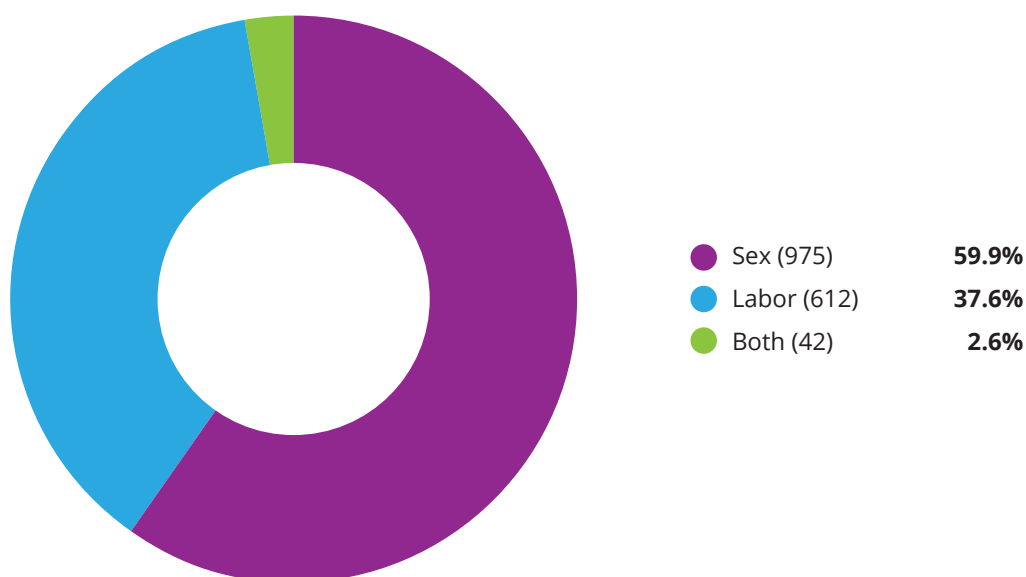


III. Overview of All Forced Labor and Sex Trafficking Cases Filed from 2003 to 2025

A. Civil Trafficking Cases Filed by Year and Type from 2003 to 2025

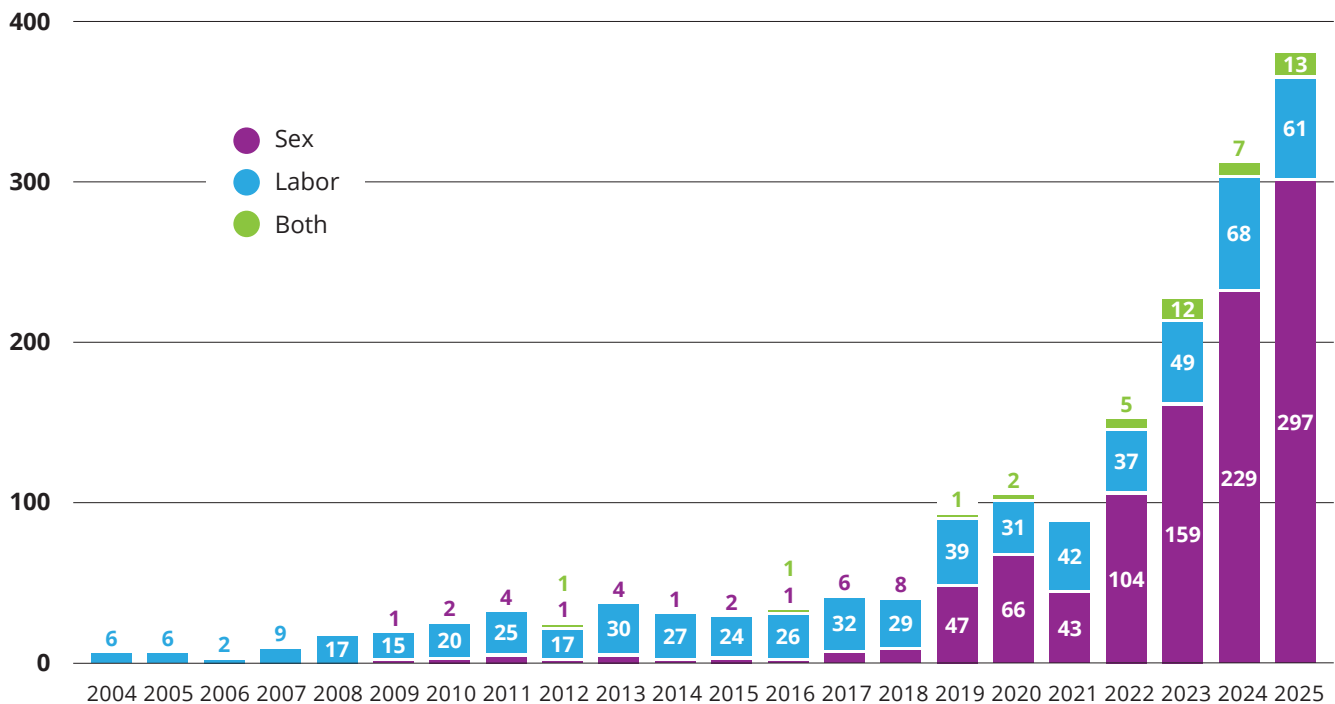
Between December 19, 2003, when the federal civil trafficking cause of action first became available, and December 31, 2025, plaintiffs filed 1,629 cases under Section 1595 of the TVPRA—975 cases alleging only sex trafficking, 612 cases alleging only forced labor, and 42 cases alleging both sex trafficking and forced labor. In 2024, the total number of sex trafficking filings surpassed cumulative forced labor filings for the first time.⁴ At the end of 2025, that margin grew considerably, with total sex trafficking cases now outnumbering total forced labor cases by more than 350 cases. This shift reflected the sustained and disproportionate rise in sex trafficking case filings over recent years.

Figure 4: Civil Cases Filed by Type (2003-2025) (Total = 1,629)



Over the twenty-two years since the civil remedy's enactment, annual filings surged from just six cases filed in 2004 to 371 cases filed in 2025. For the fourth consecutive year, plaintiffs filed a historic number of sex trafficking cases, with 310 cases filed in 2025 alone, compared to 236 in 2024. Meanwhile, cases alleging only forced labor dipped slightly from 68 in 2024 to 61 in 2025. Cases alleging both forced labor and sex trafficking nearly doubled, rising from 7 in 2024 to 13 in 2025.*

Figure 5: Civil Cases Filed by Year and Type (2003-2025) (Total = 1,629)⁵



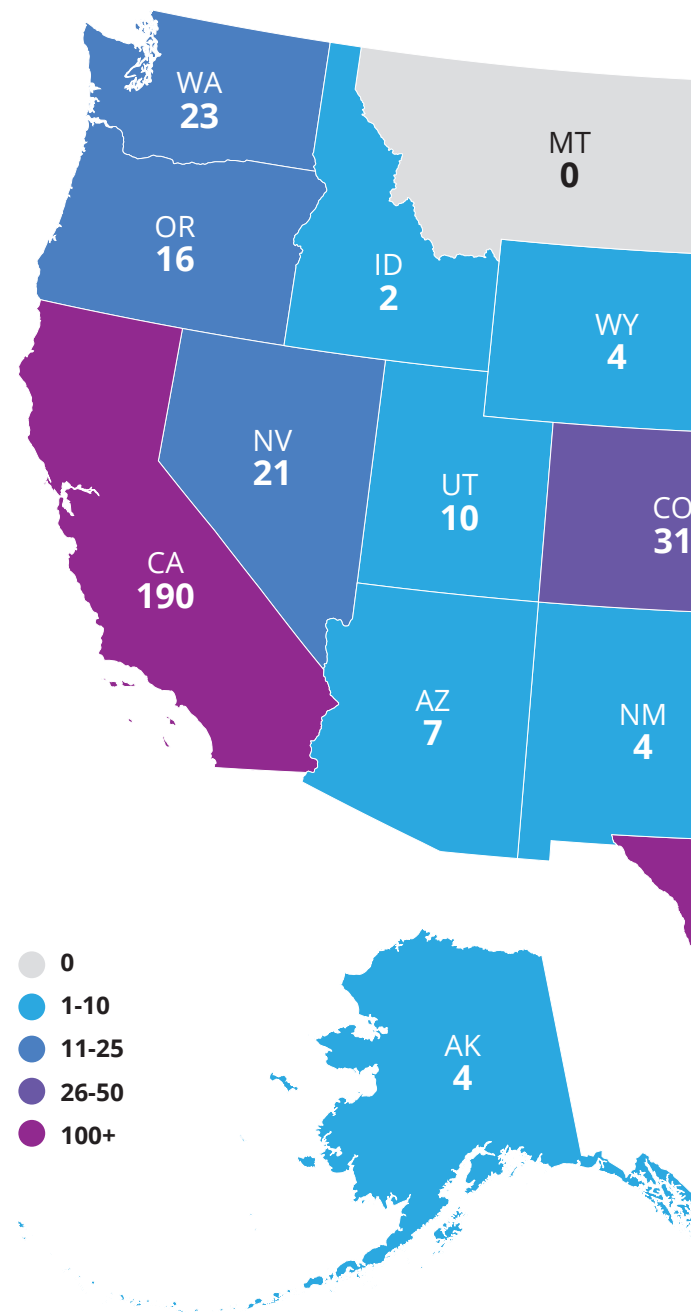
*A blue line to the left of paragraphs throughout the report indicates that the paragraph contains data and analysis specific to 2025.

B. Civil Trafficking Cases Filed by Location from 2003 to 2025

As of December 31, 2025, plaintiffs had filed cases in 47 states, the District of Columbia, and two territories. In all, plaintiffs filed the highest number of cases in Texas (238), New York (201), and California (190).⁶ Notably, Texas overtook New York for the highest number of filings at the close of 2025, and California surpassed Florida, which previously had the third-most filings at the end of 2024.

As of December 31, 2025, Delaware, Guam, Montana, Puerto Rico, and Vermont were the only remaining states and territories where plaintiffs had not filed any federal civil trafficking cases. Three other states continued to see low filing numbers, with only one federal civil trafficking case ever filed: Hawaii, New Hampshire, and Rhode Island.

Figure 6: Civil Cases by Location of Filing (2003-2025) (Total = 1,629)⁷



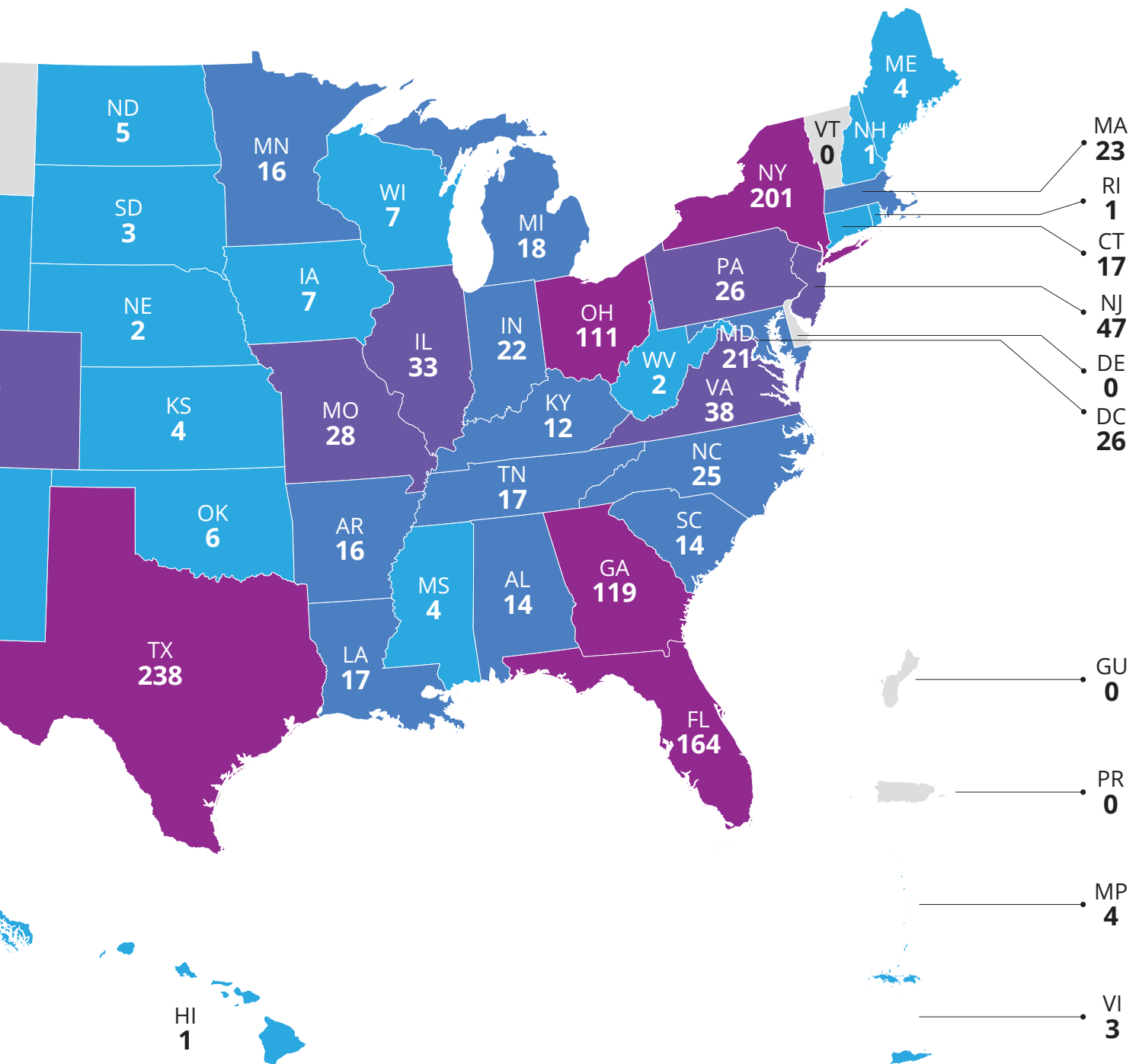
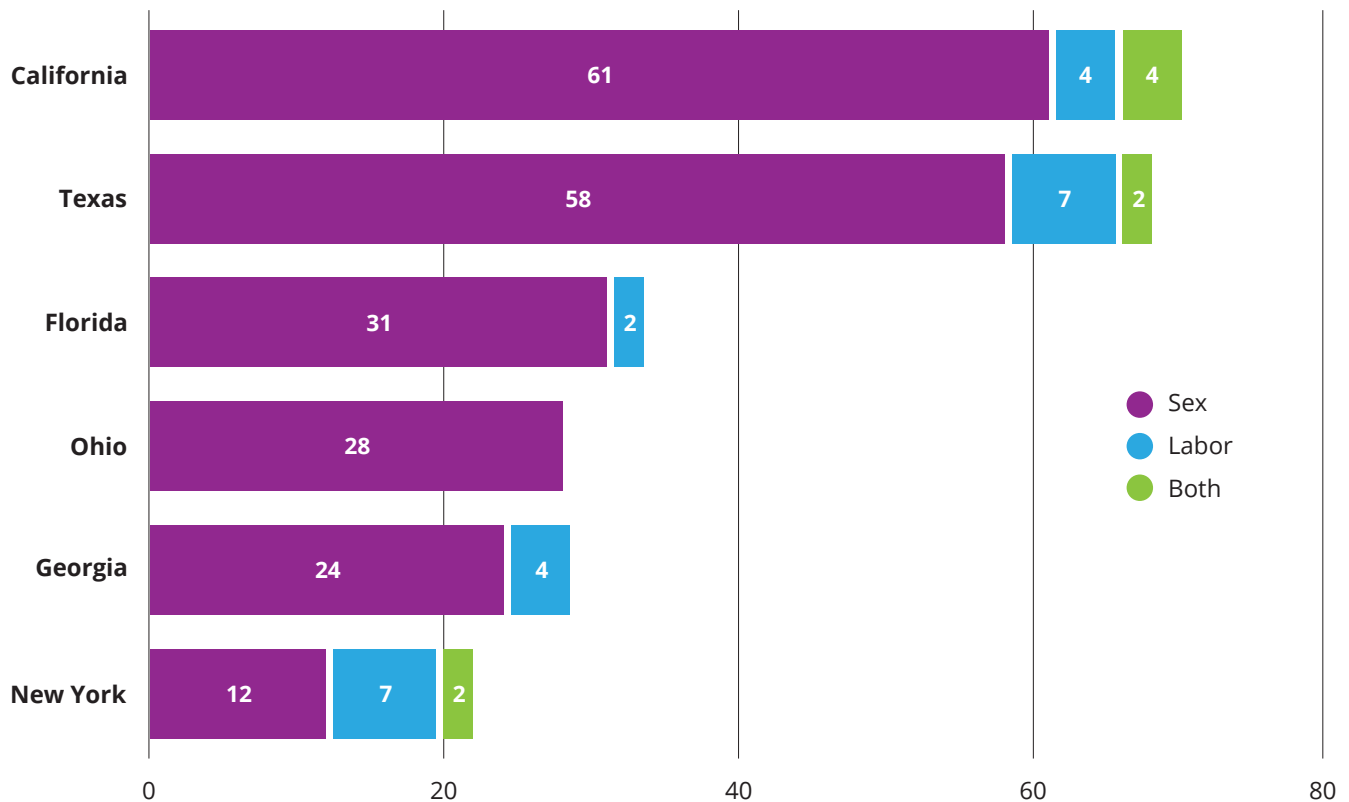


Figure 7: Top Filing Locations in 2025⁸

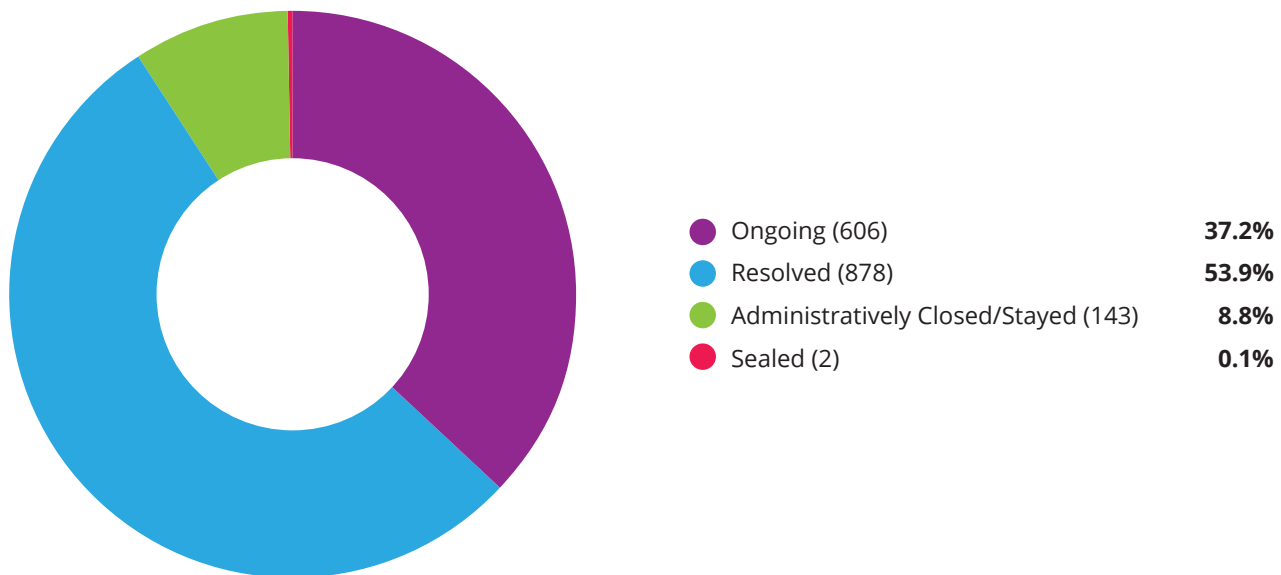
In 2025 alone, plaintiffs filed the highest number of cases in California (69), followed by Texas (67), Florida (33), Ohio (28), and Georgia (28). New York was sixth in 2025 with 21 cases, despite having the second highest total filings overall. Together, these six states represented 66 percent of all cases filed in 2025 (246 of 371). Sex trafficking allegations dominated filings in each of these states, accounting for 65 cases in California, 60 in Texas, 31 in Florida, all 28 in Ohio, 24 in Georgia, and 14 in New York.



C. Outcomes in Civil Trafficking Cases from 2003 to 2025

As of December 31, 2025, 606 cases, comprising about 37 percent of all civil trafficking cases ever filed, remained ongoing. Meanwhile, between 2003 and 2025, courts resolved 878 cases (nearly 54 percent) and administratively closed or stayed 143 cases (almost 9 percent).⁹

Figure 8: Civil Cases by Status as of Year-End 2025 (2003-2025) (Total = 1,629)

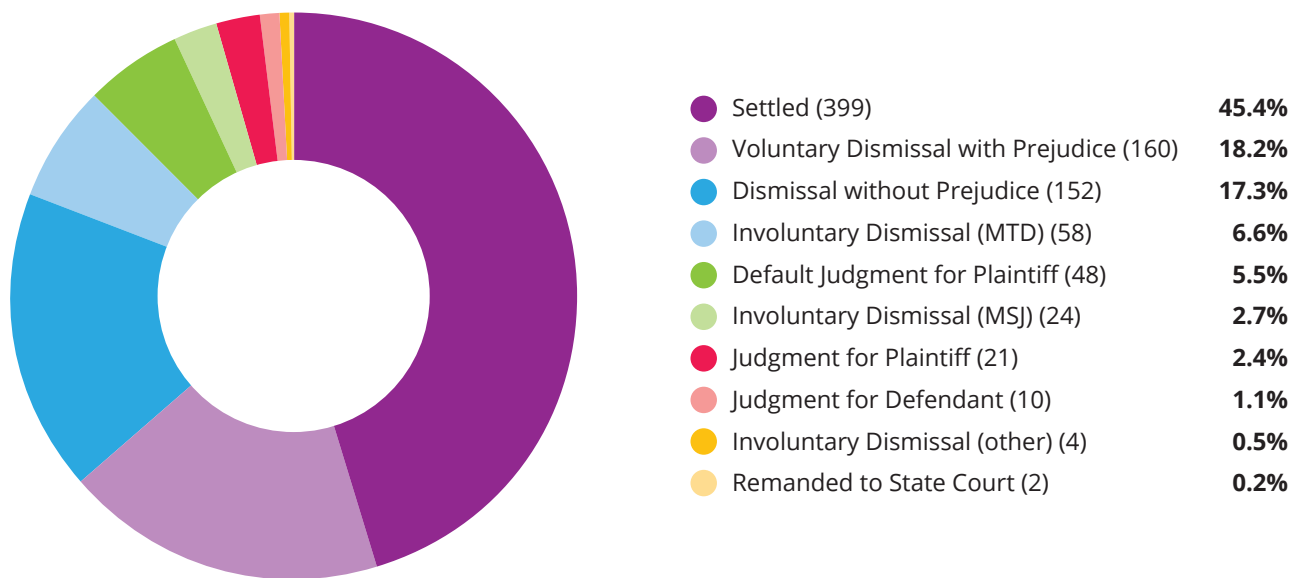


Carmen v. Health Carousel, LLC

The U.S. District Court for the Southern District of Ohio granted the largest settlement and third-largest overall award of 2025 in favor of a class of more than 4,000 healthcare professionals in *Carmen v. Health Carousel, LLC*.¹⁰ The defendant, a labor recruiter, primarily hired foreign nationals from the Philippines to work at healthcare facilities across the United States.¹¹ The members of the class of healthcare professionals signed substantially the same contracts requiring them to work for a set period of time called a “commitment period” or else face a liquidated damages penalty ranging from \$20,000 to \$50,000.¹² Health Carousel compelled the labor of these workers by controlling which hours counted towards the commitment period, failing to pay the workers the prevailing wage as required by their work visas, and following through on threats to enforce the penalty provision by initiating dozens of lawsuits against former employees.¹³ After receiving class certification under the TVPRA and RICO, the parties settled in March 2025 for \$6.05 million in monetary relief as well as for non-monetary relief, including requirements for the defendant to discharge debts, change workplace rules, and advise new employees of their rights.¹⁴

Of the 878 cases resolved by the close of 2025, more than 45 percent resulted in a settlement (399), default judgment for the plaintiff (48), or judgment for the plaintiff through summary judgment, judgment on the pleadings, or judgment at trial (21). Only nine percent of cases resulted in a judgment for the defendant (10) or involuntary dismissal (86). While a significant number of cases resulted in a publicly disclosed settlement agreement (399), the terms of the settlements, including the amount of damages awarded, remained confidential in more than 80 percent of settled cases (321). Additionally, nearly 16 percent of the resolved cases resulted in a voluntary dismissal with prejudice (160). This designation is often a signal of a confidential settlement, although it is not a definitive indication that a case settled.

Figure 9: Resolved Civil Cases by Outcome (2003-2025) (Total = 878)



1. Cases Administratively Stayed or Closed

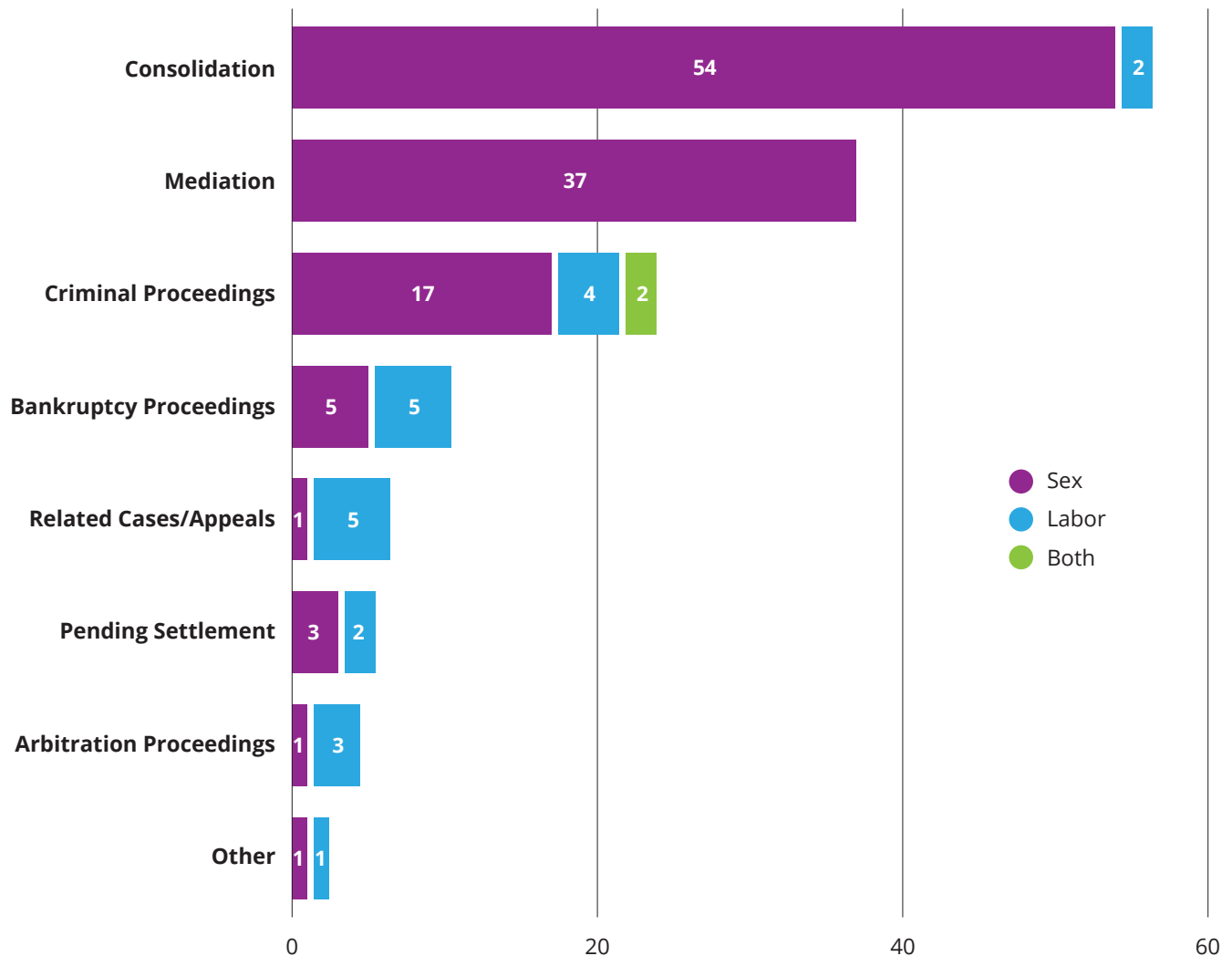
The number of cases stayed reached an all-time high in 2025. At the end of 2025, 143 civil trafficking cases were under an administrative closure or stay; courts put 61 of those closures or stays in place during 2025 alone. Overall, federal courts administratively closed or stayed cases for a variety of reasons, including consolidation under a lead case (56), pending mediation (37) or settlement negotiations (5), a related criminal case (23), bankruptcy proceedings (10), related cases or appeals (6), and compelled arbitration (4).¹⁵

Notably, all 37 mediation-related stays stemmed from sex trafficking cases against a major hotel and hospitality defendant, G6 Hospitality LLC, and its related entities. Defense counsel for the G6 Hospitality entities, Jones Day, coordinated many of the mediations. Plaintiffs' counsel in these cases did not oppose the stays.¹⁶ Courts entered the majority of the stays in the second half of 2025. The cases subject to the stays spanned three jurisdictions—the Eastern District of Texas (34), the Southern District of Texas (2), and the District of South Carolina (1). The mediation-related stays facilitated ongoing global settlement discussions designed to resolve all civil TVPRA claims against G6 Hospitality entities where Jones Day served as defense counsel.¹⁷

Stays due to related criminal proceedings also increased significantly. At the close of 2025, 23 cases remained stayed due to pending criminal actions, as required by Section 1595(b); courts issued six of those stays in 2025. That provision mandates 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.”¹⁸ Of the 23 cases that remained stayed at the end of 2025, 17 alleged only sex trafficking, four alleged only forced labor, and two alleged both sex trafficking and forced labor. Over half of the cases still stayed involved high-profile defendants, including nine cases against Backpage.com, LLC; one against the former CEO of Abercrombie, Michael Jeffries,¹⁹ and his partner, Matthew Smith; two against an associate of former fashion executive, Peter Nygard; and one against two of the three Alexander brothers, Tal and Oren.²⁰

These administrative stays highlight the growing connection between civil and criminal trafficking cases. First, civil cases may play a role in spurring criminal proceedings. Between 2003 and 2025, at least eight federal criminal prosecutions commenced *after* a plaintiff filed a related civil case under the TVPRA.²¹ Some of these cases related to high-profile defendants discussed above, including the founders of Backpage, Jeffrey Epstein, Sean “Diddy” Combs, Michael Jeffries, and Peter Nygard.²² Other cases involved allegations of forced labor in disparate settings: on farms, in cults, and in a convenience store. Specifically, one case arose from a case federal prosecutors later dubbed “Operation Blooming Onion,” a criminal scheme in which migrant workers from Mexico were allegedly compelled to labor on farms across Georgia.²³ Two other cases involved members of religious organizations—the United Nation of Islam and La Luz Del Mundo—whose leaders allegedly exploited followers as a captive workforce, and, in the latter cult, for sexual abuse of minors.²⁴ Another case centered on a plaintiff in Virginia who alleged he was forced to work at a gas station and convenience store.²⁵ In each of these cases, plaintiffs filed a civil case first, and an indictment followed.

Figure 10: Civil Cases Under Administrative Closure or Stay by Reason as of Year-End 2025 (2003-2025)
(Total = 143)



On the other hand, criminal proceedings can also cause delays for survivors seeking justice through civil cases. For example, a group of Indian nationals transported to the United States on R-1 religious visas to do construction work on Hindu temples filed a civil case in May 2021, *Kumar v. BAPS Swaminarayan Sanstha, Inc.*²⁶ In November 2021, the U.S. District Court for the District of New Jersey stayed the case because the U.S. Attorney's Office for the District of New Jersey had opened a criminal investigation into related activity.²⁷ Nearly four years later, the court agreed to lift the stay after federal prosecutors informed the parties that the Department of Justice intended to close their investigation without bringing charges.²⁸ By that point, twelve named plaintiffs had withdrawn their claims, and one named plaintiff and one putative class member had died from silicosis—a disease possibly linked to the forced labor they allegedly endured.²⁹

LAW.COM

End of DOJ Probe Clears Path for Human-Trafficking Lawsuit

The stay has been in place for nearly four years, and locating parties and witnesses from the case could be a challenge.

4 minute read | September 24, 2025 at 02:40 PM By  Charles Toutant



The Akshardham temple in Robbinsville, New Jersey. The temple is at the center of a civil forced labor case, *Kumar v BAPS Swaminarayan Sanstha*, which was administratively stayed from 2021 to 2025 due to a criminal investigation. Charles Toutant, *End of DOJ Probe Clears Path for Human-Trafficking Lawsuit*, LAW.COM (Sep. 24, 2025), <https://www.law.com/njlawjournal/2025/09/24/end-of-doj-probe-clears-path-for-human-trafficking-lawsuit/> (Maria / Adobe Stock)

Finally, criminal enforcement actions may directly enable survivors to pursue civil cases. In March 2025, federal and local law enforcement raided a flooring manufacturing facility in Georgia as part of a criminal investigation into labor trafficking of foreign nationals.³⁰ Several survivors escaped from the facility at the time of the raid.³¹ The workers subsequently filed a civil TVPRA case against their traffickers, *Liu v. Wellmade Industries Manufacturing N.A. LLC* in the U.S. District Court for the Northern District of Georgia.³²

While stays can be disruptive, the interplay between federal civil and criminal cases can benefit trafficking survivors pursuing accountability for their traffickers. This is particularly true when a conviction in a criminal case can be converted into a summary judgment motion in a civil case alleging the same criminal activity. Stays can frustrate plaintiffs, but criminal convictions resolve the issue of liability, transforming subsequent civil litigation into an inquest into damages. And when a criminal case ends with a mandatory restitution order under 18 U.S.C. § 1593, a civil case can be a tool to advocate for payment of the underlying criminal restitution order, as well as an opportunity to secure civil damages.

Liu v. Wellmade Industries Mfr. N.A. LLC

In *Liu v. Wellmade Industries Mfr. N.A. LLC*, the plaintiffs alleged that a Georgia-based flooring manufacturer recruited them and dozens of others from China to work in trainer and managerial positions at the defendants' factory.³³ Instead, the defendants allegedly coerced them to perform manual labor for more than 12 hours a day, six or seven days a week, in unsafe working conditions.³⁴ The defendants confiscated their passports, prevented them from leaving their inadequate housing, and physically and verbally attacked the plaintiffs.³⁵ The defendants threatened to invoke substantial termination penalties in the plaintiffs' contracts.³⁶

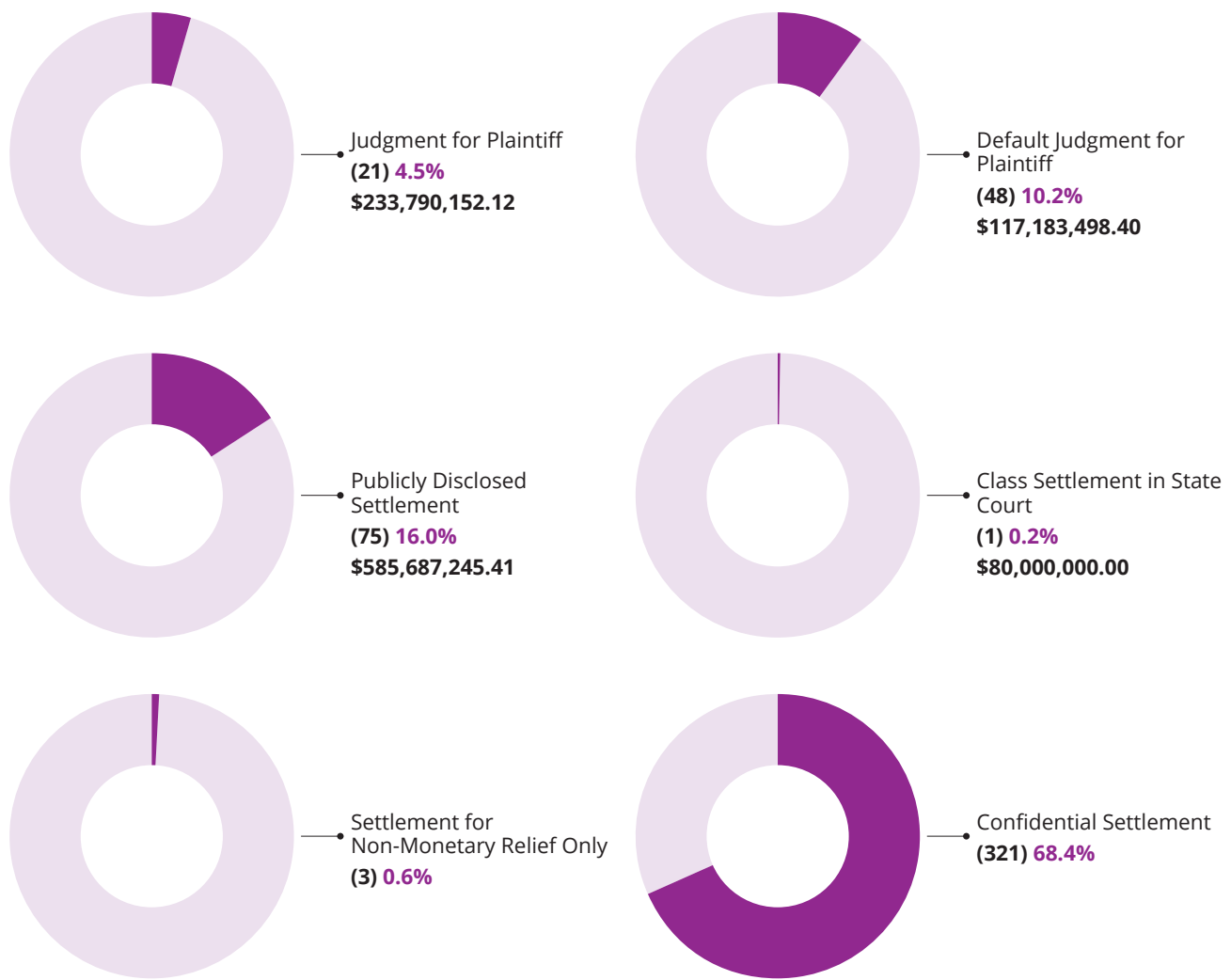
Federal and local law enforcement conducted a raid on the facility in March 2025 and arrested three of the four defendants on state trafficking charges.³⁷ In May 2025, the workers filed *Liu*, a class action with TVPRA and non-TVPRA claims against the manufacturer corporations and the individual owners and managers.³⁸ Given the pending criminal proceedings, the defendants filed a motion to stay the civil case under Section 1595(b) in August 2025.³⁹ At the time of publication, the Northern District of Georgia had granted the motion, administratively staying the case before the parties could litigate any substantive issues.⁴⁰



2. Damages and Settlement Awards

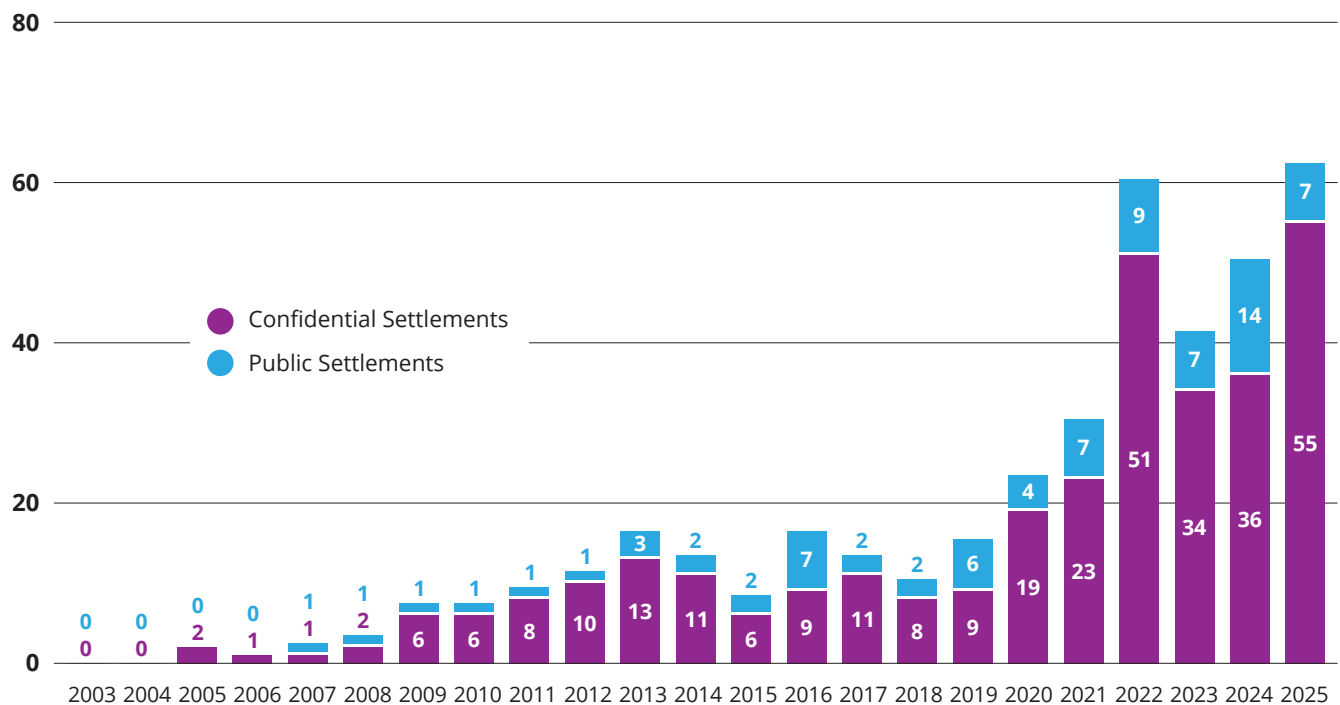
Plaintiffs filing civil cases under the TVPRA hit a milestone in 2025: the total aggregated damages in cases with publicly disclosed awards surpassed \$1 billion.⁴¹ As of December 31, 2025, the total known damages awarded was \$1,016,660,895.93 across 145 civil TVPRA cases filed between 2003 and 2025. Of the 145 total cases, 21 resulted in a judgment for the plaintiff through judgments on the pleadings or judgments at trial, 48 resulted in a default judgment for the plaintiff, 75 resulted in a publicly disclosed settlement, and one resulted in a class settlement in state court following remand. These 145 cases represent nearly one-third of the 469 total civil TVPRA cases that resulted in damages or a settlement award during this period. Of the remaining 324 cases, three resulted in public settlements for non-monetary relief only, and 321 were resolved through confidential settlements whose terms and award amounts are unknown.

Figure 11: Civil Cases Resulting in Damages or Settlement Awards by Outcome and Aggregate Recovery (2003-2025) (Total = 469)



Public dockets rarely reveal whether plaintiffs are able to collect default judgment awards,⁴² but settlements are generally collected in full. That said, the damages total does not fully reflect the amount of damages collected through settlements. As of December 31, 2025, litigants had settled a total of 321 trafficking cases on confidential terms, 188 alleging only forced labor, 131 alleging only sex trafficking, and two alleging both forced labor and sex trafficking. In fact, there were more confidential settlements in 2025 (55) than in any other year—34 in cases alleging only sex trafficking, 20 in cases alleging only forced labor, and one in a case alleging both forced labor and sex trafficking. The 55 confidential settlements in 2025 outnumbered cases that resulted in public settlements in 2025 by a factor of eight (7 public settlements).

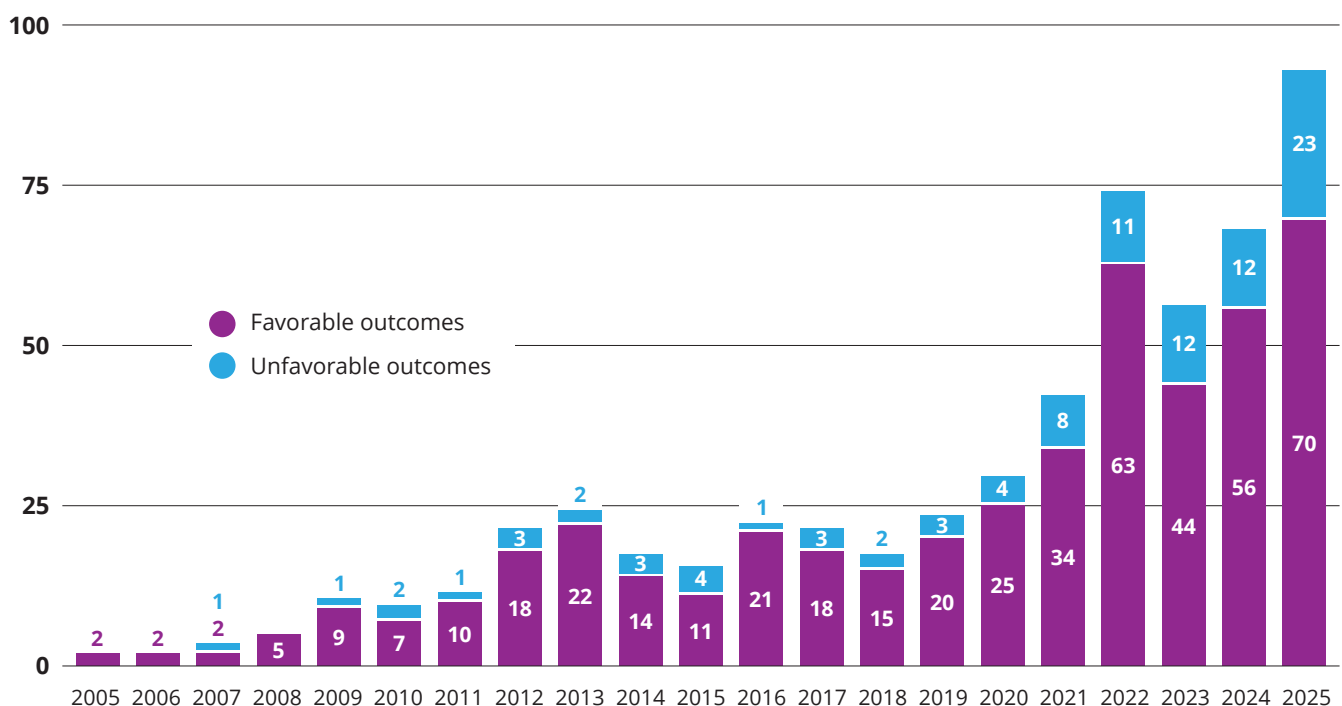
Figure 12: Civil Cases Resulting in Settlement by Settlement Type and Year (2003-2025) (Total = 399)



In 2025, cases filed under Section 1595 continued to result in favorable outcomes for plaintiffs more often than in unfavorable outcomes.⁴³ In 2025, 70 cases resolved with a favorable outcome (75 percent) as compared to 23 with unfavorable outcomes (25 percent)—an increase from 12 unfavorable outcomes in 2024. Fourteen of the 23 unfavorable outcomes in 2025 were in cases involving allegations of sex trafficking (61 percent). Three of the 14 sex trafficking cases were involuntarily dismissed on a motion to dismiss finding that the defendant was immune from suit under Section 230 of the Communications Decency Act.⁴⁴ Courts found that five of the 14 sex trafficking cases violated the TVPRA's ten-year statute of limitations. Finally, across all 23 civil trafficking cases with unfavorable outcomes, several were involuntarily dismissed on motions to dismiss or motions for summary judgment for a variety of reasons, such as inadequately pleading participation or knowledge as required to establish venture liability under the TVPRA.⁴⁵

Of the 70 cases that resolved with a favorable outcome, the damages awarded were publicly available in only 14 cases;⁴⁶ those 14 cases resulted in \$65,366,256.08 in damages.⁴⁷ Significantly, the sole sex trafficking case with a publicly available damages award in 2025 was a jury verdict of \$40 million against a hotel. The remaining \$25,366,256.08 in damages was awarded in 13 forced labor cases.

Figure 13: Civil Cases by Favorable/Unfavorable Outcome and Year (2003-2025) (Total = 564)



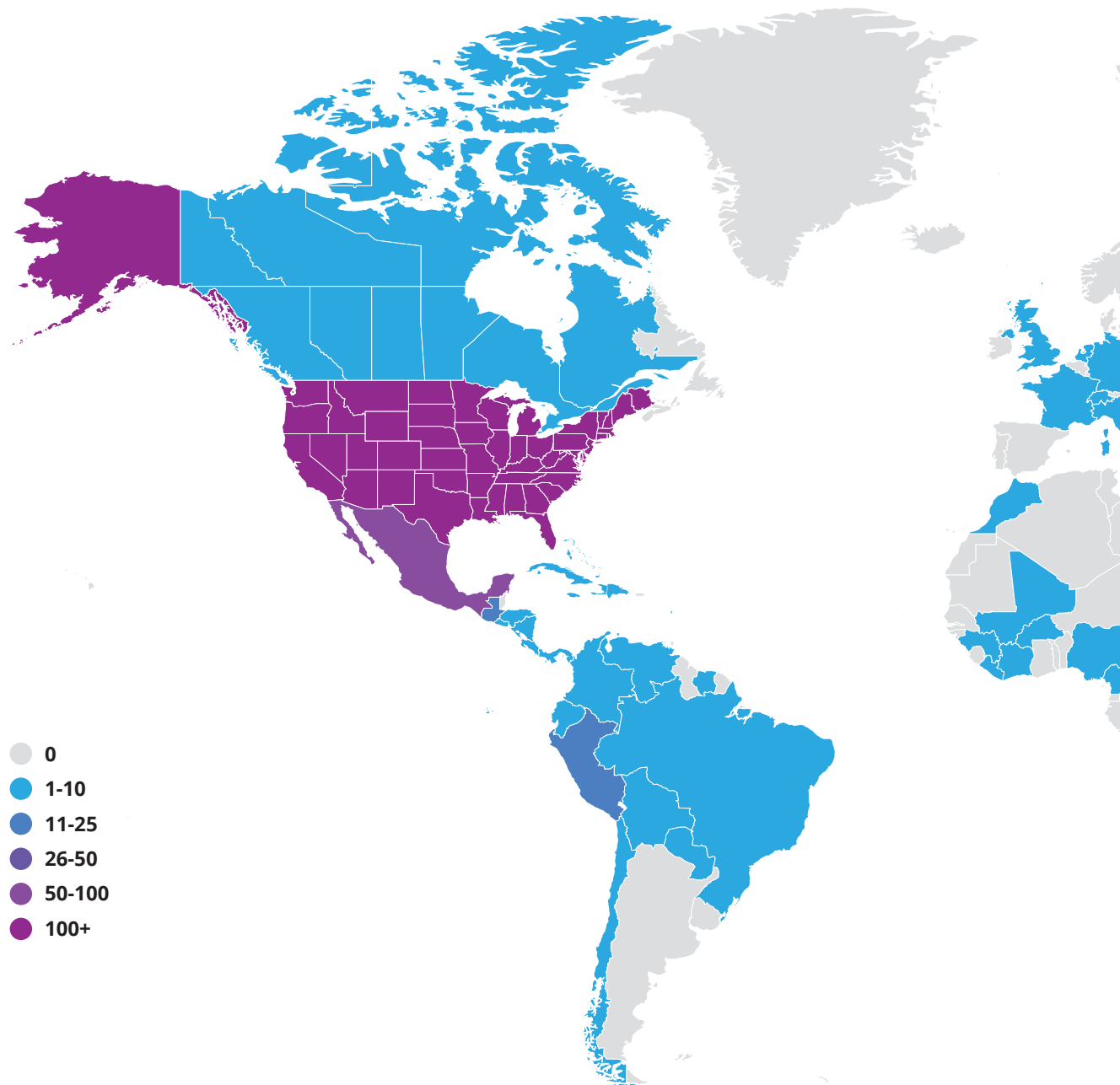


D. Plaintiffs in Civil Trafficking Cases from 2003 to 2025

1. Plaintiff's Country of Origin

As of December 31, 2025, plaintiffs from 87 different countries had filed federal trafficking cases. Between 2003 and 2025, U.S. citizens brought the largest number of cases (610), the majority involving sex trafficking allegations (530, or nearly 87 percent). Foreign-born plaintiffs brought 515 cases,⁴⁸ the majority

Figure 14: Trafficking Plaintiff's Country of Origin (Map) (2003-2025)



involving forced labor allegations (468, or nearly 91 percent). Citizens of Mexico (99 cases), the Philippines (99 cases), and India (51 cases) filed the largest number of cases between 2003 to 2025, with all but two cases involving allegations of forced labor.

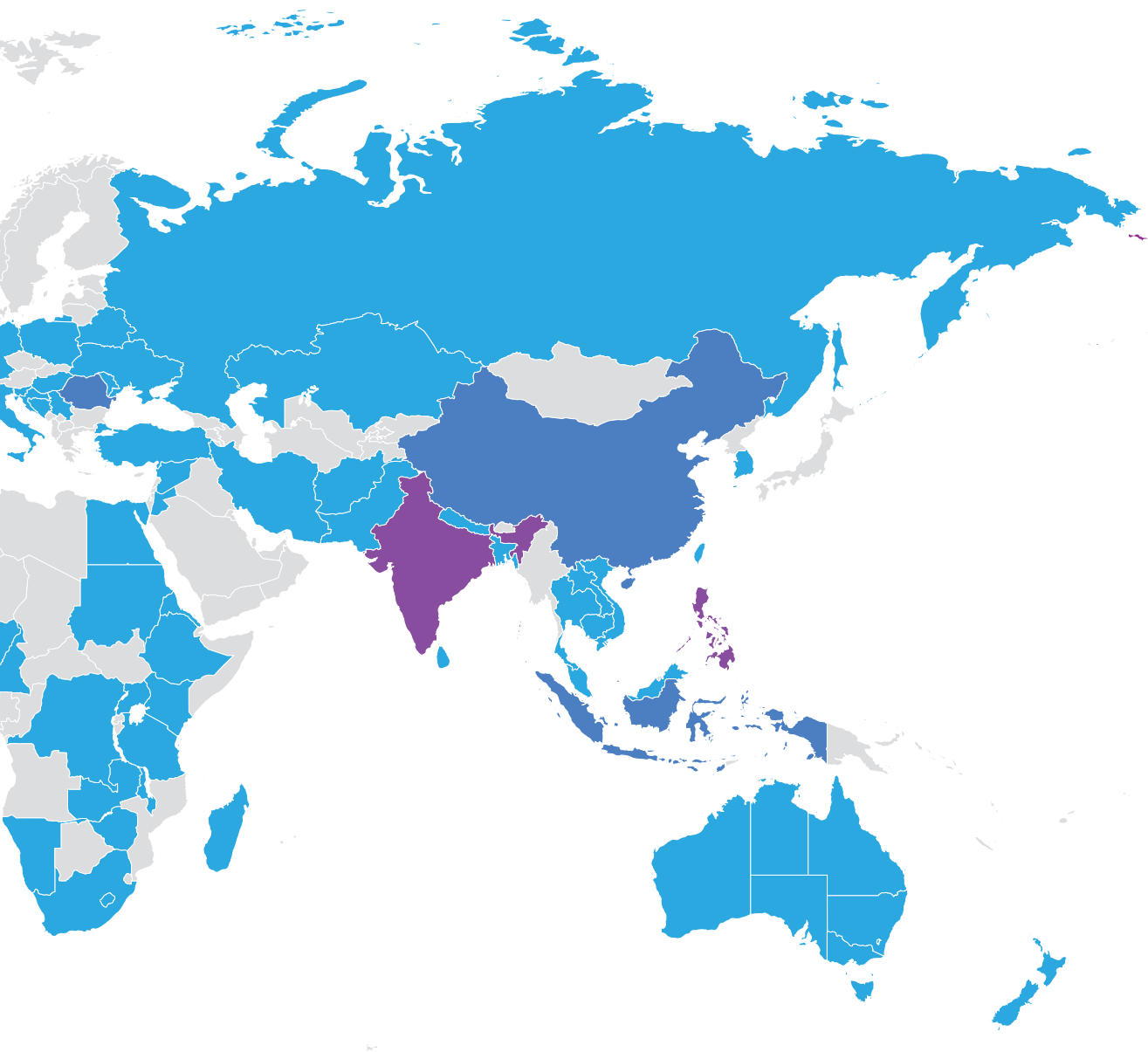




Figure 15: Trafficking Plaintiff's Country of Origin (2003-2025)⁴⁹

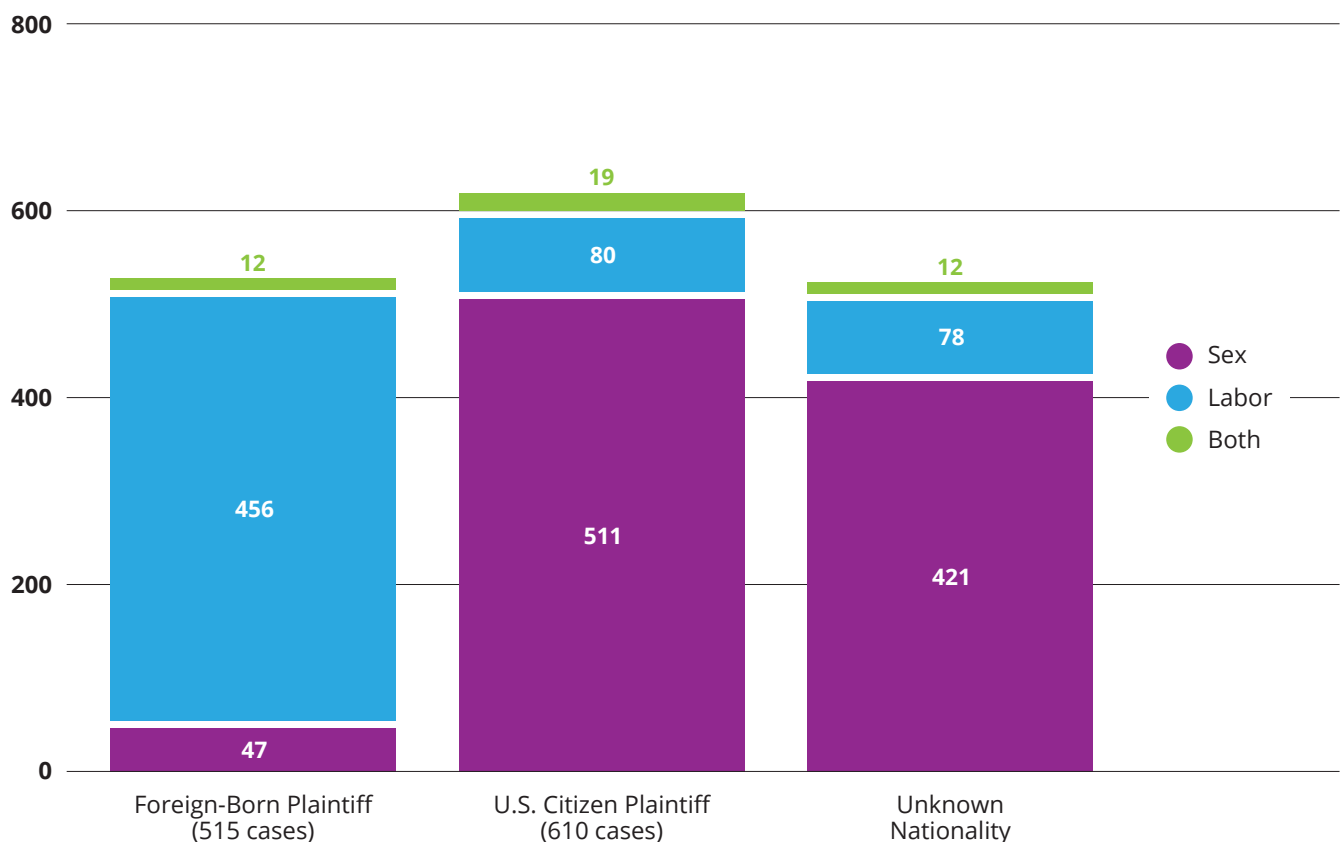
Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases	Country of Origin of Plaintiff(s)	# of cases
Afghanistan	1	El Salvador	4	Malawi	1	South Africa	6
Australia	3	Eritrea	1	Malaysia	3	South Korea	4
Bahamas	1	Ethiopia	5	Mali	2	Sri Lanka	3
Bangladesh	5	France	2	Mexico	99	St. Vincent and the Grenadines	1
Belarus	2	Germany	3	Moldova	1	Sudan	1
Bolivia	2	Guatemala	20	Morocco	3	Suriname	1
Bosnia and Herzegovina	1	Guinea	1	Namibia	2	Swaziland	1
Brazil	8	Haiti	3	Nepal	4	Switzerland	1
Burkina Faso	2	Honduras	8	Netherlands	1	Syria	1
Cambodia	5	Hungary	1	New Zealand	3	Taiwan	1
Cameroon	4	India	51	Nicaragua	2	Tanzania	3
Canada	5	Indonesia	12	Nigeria	4	Thailand	4
Chile	7	Iran	1	Pakistan	8	Turkey	2
China	18	Italy ⁵⁰	1	Panama	1	Uganda	3
Colombia	5	Ivory Coast	1	Paraguay	2	Ukraine	2
Costa Rica	1	Jamaica	3	Peru	11	United Kingdom	3
Croatia	2	Jordan	1	Philippines	99	United States	610
Cuba	1	Kazakhstan	1	Poland	3	Venezuela	2
Democratic Republic of Congo	2	Kenya	4	Romania	23	Vietnam	2
Dominican Republic	6	Laos	1	Russia	4	Zambia	1
Ecuador	5	Liberia	1	Serbia	2	Zimbabwe	1
Egypt	1	Madagascar	1	Slovenia	2	Unknown ⁵¹	534

2. Plaintiff's Immigration Status and Citizenship⁵²

As of December 31, 2025, foreign-born plaintiffs had filed more than 31 percent of all civil cases (515 of 1,629) brought under the TVPRA.⁵³ Of the 515 cases filed by foreign-born plaintiffs between 2003 and 2025, almost 91 percent alleged forced labor (468).⁵⁴

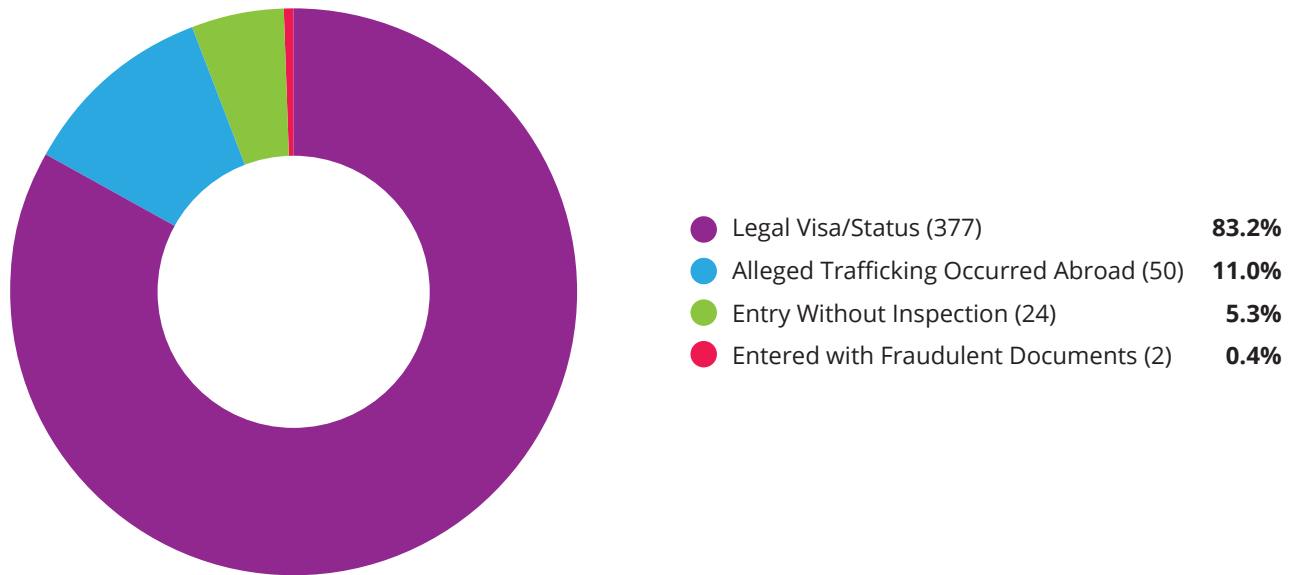
At the end of 2025, U.S. citizens had filed 37 percent (610) of all TVPRA cases ever filed. Of the 610 cases filed by U.S. citizens between 2003 and 2025, 87 percent alleged sex trafficking (437). In the remaining cases, plaintiff's nationality was unknown.

Figure 16: Civil Cases by Plaintiff's Immigration Status or Citizenship and Type (2003-2025)⁵⁵



Among cases filed by foreign-born plaintiffs where the method of entry could be ascertained, the majority of cases involved plaintiffs who entered the United States with visas or other legal status (375 of 403 cases, or 93 percent).⁵⁶ Conversely, the percentage of cases involving plaintiffs who entered the United States without inspection or with fraudulent documents was about six percent (26 of 403).

Figure 17: Cases by Foreign-Born Plaintiff's Method of Entry into the United States (2003-2025)
(Total = 453)



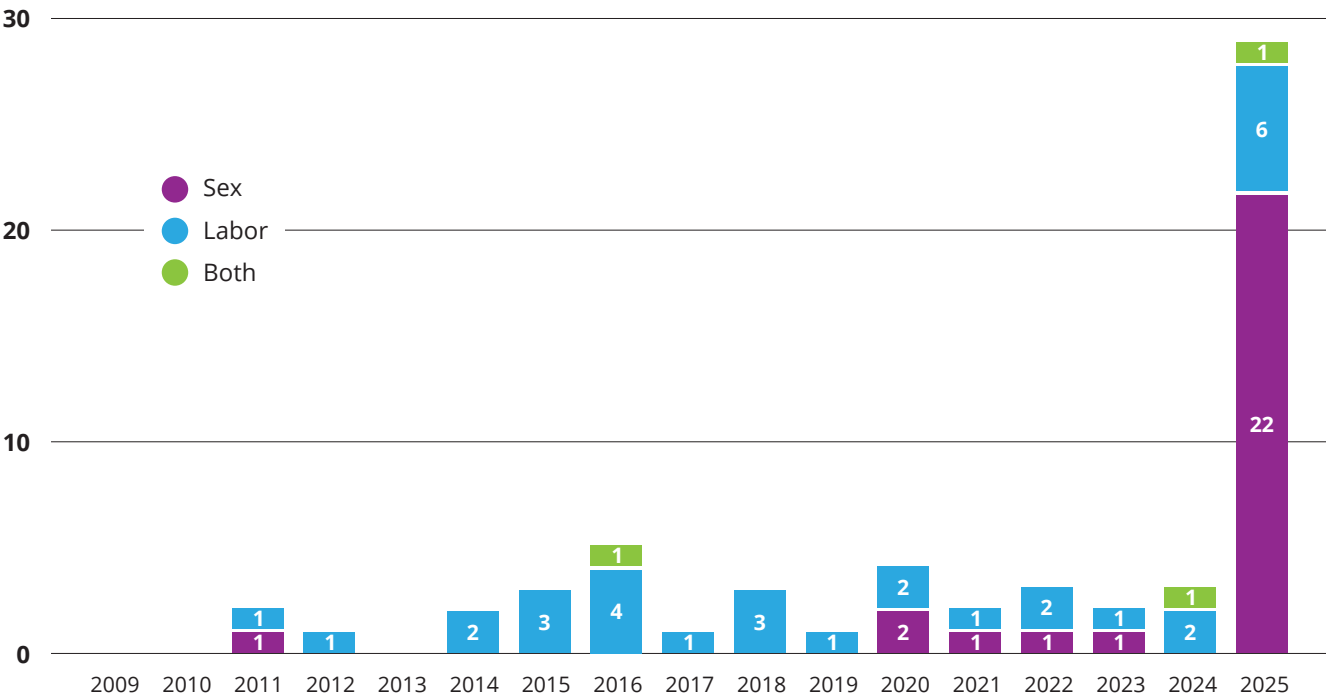
3. Plaintiffs Invoking Extraterritorial Jurisdiction

Since December 2008, the TVPRA has provided extraterritorial jurisdiction, codified at 18 U.S.C. § 1596 (“Section 1596”). This statute permits a plaintiff to bring a lawsuit under Section 1595 even when all of the trafficking occurred abroad. In order to invoke extraterritorial jurisdiction under the TVPRA, 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 at the time of filing, as many remain abroad.

In 2024, plaintiffs filed just three cases invoking Section 1596.⁵⁷ In 2025, the number of cases filed under extraterritorial jurisdiction surged to 29 cases. Of the 29 filings in 2025, 22 of them involved allegations of sex trafficking in Romania against Harvest Christian Fellowship.⁵⁸ The remaining seven cases alleged forced labor.

These seven cases represent the highest number of forced labor filings invoking Section 1596 in any single year. Three cases were brought by migrant workers from the Philippines who performed construction work for the 2022 World Cup in Qatar, allegedly under inhumane conditions.⁵⁹ One case, filed as both a forced labor and sex trafficking case, alleged that a high-profile sports agent, Jonathan Barnett, forced a woman into sexual servitude at various places throughout the world.⁶⁰ A group of commercial truck drivers from Mexico filed a case against their U.S.-based employers alleging threats against them in Mexico.⁶¹ The final two cases involved forced labor in two different global supply chains—tuna fishing and coffee harvesting.⁶²

Figure 18: Civil Cases Invoking Extraterritorial Jurisdiction Under 18 U.S.C. § 1596 by Type and Year (2003-2025) (Total = 61)



Filings in 2025 nearly doubled the total number of cases invoking the extraterritorial jurisdiction provision of the TVPRA, bringing the total to 61 cases as of December 31, 2025.⁶³ Of the 61 total extraterritorial TVPRA cases, plaintiffs alleged only forced labor in 30 cases (49 percent), only sex trafficking in 28 cases (nearly 46 percent), and both forced labor and sex trafficking in 3 cases (5 percent).

Angga v. Bumble Bee Foods, LLC

In *Angga v. Bumble Bee Foods, LLC*, four Indonesian fishers alleged that they were forced to work under brutal conditions aboard longline fishing vessels supplying tuna to U.S.-based Bumble Bee Foods.⁶⁴ The plaintiffs alleged physical abuse, deprivation of food and medical care, and isolation at sea, compounded by debt bondage in which their wages were reduced to little or nothing after fees, deductions, and penalties.⁶⁵ In November 2025, the U.S. District Court for the Southern District of California denied the defendant's motion to dismiss the plaintiffs' TVPRA claims.⁶⁶ The court held that the plaintiffs' forced labor claims were not impermissibly extraterritorial because the defendant was "clearly present in the United States."⁶⁷



© Sandy Huffaker Jr. / Greenpeace

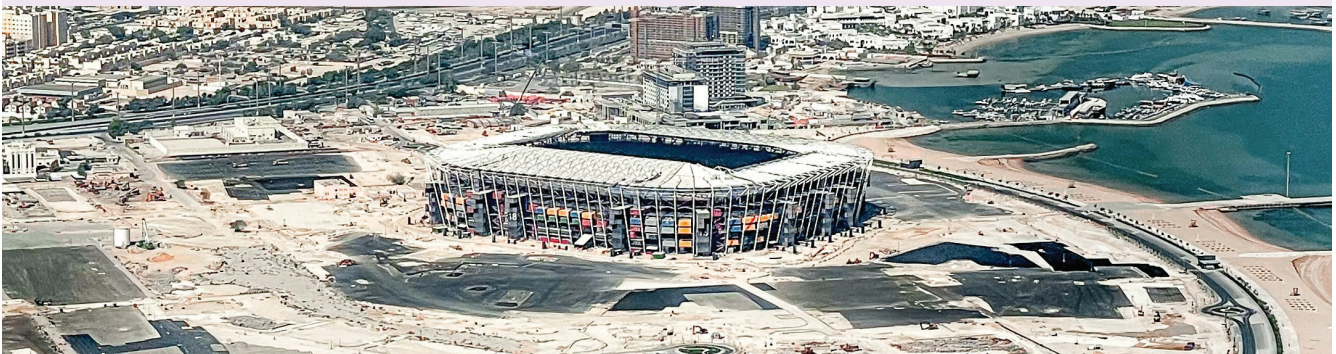
F.C. v. Jacobs Solutions, Inc.

In recent years, migrant workers have brought several cases alleging they were subjected to forced labor while constructing stadiums for the 2022 FIFA World Cup in Qatar.⁶⁸ These cases implicate the interplay between the TVPRA's extraterritoriality and venture liability provisions, as courts must assess whether civil liability can reach U.S.-based entities that allegedly benefited from forced labor occurring abroad.

In June 2025, the U.S. District Court for the District of Colorado partly granted and partly denied the defendants' motion to dismiss in *F.C. v. Jacobs Solutions, Inc.*⁶⁹ Jacobs Solutions is a U.S.-based technical professional services corporation alleged to have managed and supervised construction of the World Cup stadiums and related infrastructure in Qatar.⁷⁰ On the question of extraterritoriality, the court held—consistent with other courts, including the Fourth Circuit—that Section 1595(a)'s extraterritorial reach is coextensive with that of the predicate criminal offense on which the civil claim rests.⁷¹ That reach is not unlimited, however: Section 1596 extends the TVPRA's extraterritorial jurisdiction only where the “alleged offender” is a U.S. national, permanent resident, or otherwise present in the United States.⁷² The court further reasoned that “offender” in this context refers to the direct perpetrator rather than a knowing beneficiary of a trafficking venture. The court held that the plaintiff must allege that the person or entity who *committed* the underlying violation is a U.S. national, permanent resident, or present in the U.S.⁷³

Applying this framework, the court allowed the plaintiffs' forced labor claim under 18 U.S.C. § 1589 to proceed but dismissed the trafficking claim under 18 U.S.C. § 1590.⁷⁴ The distinction turned on whether the underlying criminal provision—not Section 1595's civil remedy—itself includes venture liability: because 18 U.S.C. § 1589 extends criminal liability to participants in a forced labor venture, a venture beneficiary can qualify as the “offender” whose U.S. status satisfies Section 1596's extraterritoriality requirement; 18 U.S.C. § 1590 does not, and therefore it cannot support extraterritorial jurisdiction over a venture beneficiary.⁷⁵

At the time of publication, the U.S. District Court for the District of Colorado denied the defendants' motion for interlocutory appeal of this decision.⁷⁶



4. Plaintiffs Proceeding Anonymously

In 2025, plaintiffs sought leave to file anonymously in more than 74 percent of new cases filed (276 of 371). Across all civil TVPRA cases filed as of December 31, 2025, plaintiffs sought to proceed under a pseudonym in at least 56 percent of cases (914 of 1,629). In seeking to file under a pseudonym, trafficking survivor plaintiffs pointed to the need to protect their privacy and safety, as well as fear of retribution from their traffickers or other harm resulting from the public disclosure of their identity.

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.

In 2025, courts in at least two districts denied motions to proceed anonymously, among the rare instances in which courts found that the plaintiffs failed to demonstrate a sufficiently concrete need for anonymity. In *Acree v. Alexander*, the U.S. District Court for the Southern District of New York denied the plaintiff's motion to proceed anonymously, finding that she had offered little more than speculation as to any existing or future harm from disclosure and had already disclosed her identity to the defendants.⁷⁷ Similarly, in *Lim-Tom v. United States*, the U.S. District Court for the Northern District of Florida rejected generalized claims of social stigma arising from sexual abuse victimization as an inadequate basis for anonymity. The court concluded that the potential future harm the plaintiff identified was no different from that faced by any prisoner suing prison officials.⁷⁸ Motions to proceed under a pseudonym must therefore rest on specific, concrete allegations of harm. These motions must address each factor courts apply in weighing confidentiality against the presumption of open proceedings.

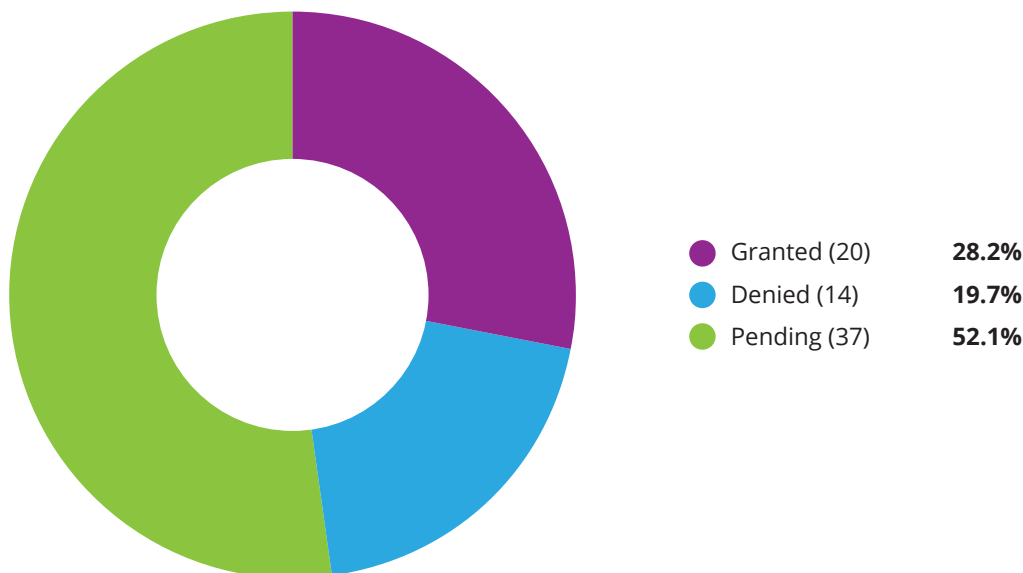
5. Class Certification

In recent years, plaintiffs have sought to file class actions under the TVPRA, bringing claims 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.”⁷⁹

Between 2003 and 2025, plaintiffs sought class certification in 123 federal trafficking cases.⁸⁰ The majority of these cases involved allegations of forced labor (103 of 123 cases). Of the 123 cases, 27 cases closed without a determination on class certification and 44 cases remained pending, leaving 52 cases with a resolved outcome on class certification. Among the 52 resolved cases, courts granted plaintiffs’ class certification requests (either fully or in part) in 38 civil trafficking cases and denied the requests in full in 14 cases, yielding an overall grant rate of 73 percent. In addition, the court approved a class settlement without specifying the type of claim for which the class was certified in five cases, which remained unchanged from 2024.

Of the 123 cases filed as a class action between 2003 and 2025, 71 sought class certification under the TVPRA, either alone or alongside non-TVPRA claims. Among 34 cases where the TVPRA class claim was decided, courts granted certification in 20 instances and denied it in 14,⁸¹ a grant rate of nearly 59 percent. TVPRA class certification motions were still pending at the close of 2025 in the remaining 37 cases.

Figure 19: Civil Cases Seeking Class Certification Under the TVPRA by Outcome (2003-2025) (Total = 71)



Yeend v. Akima Global Services, LLC

Civil immigration detainees held at Akima Global Service's ("AGS") private facility in Batavia, New York, brought a class action alleging that AGS violated the TVPRA's forced labor prohibition by requiring detainees to perform kitchen, maintenance, and other work for \$1 or less per day under threat of discipline, loss of privileges, and other penalties.⁸² In March 2025, the U.S. District Court for the Northern District of New York granted the plaintiffs' motion for class certification, allowing all three requested classes to proceed, including a Forced Labor Class in connection with TVPRA claims.⁸³

AGS appealed the decision before the U.S. Court of Appeals for the Second Circuit in April 2025.⁸⁴ The issue on appeal is whether the district court properly applied the Second Circuit's hybrid standard for coercion under the TVPRA when evaluating the requirements for certification of the Forced Labor Class.⁸⁵ Under the hybrid standard, coercion is assessed through both a subjective lens—accounting for the victim's particular vulnerabilities—and an objective one, requiring that the victim's acquiescence was reasonable under the circumstances.⁸⁶ At the time of publication, the case was fully briefed on appeal.

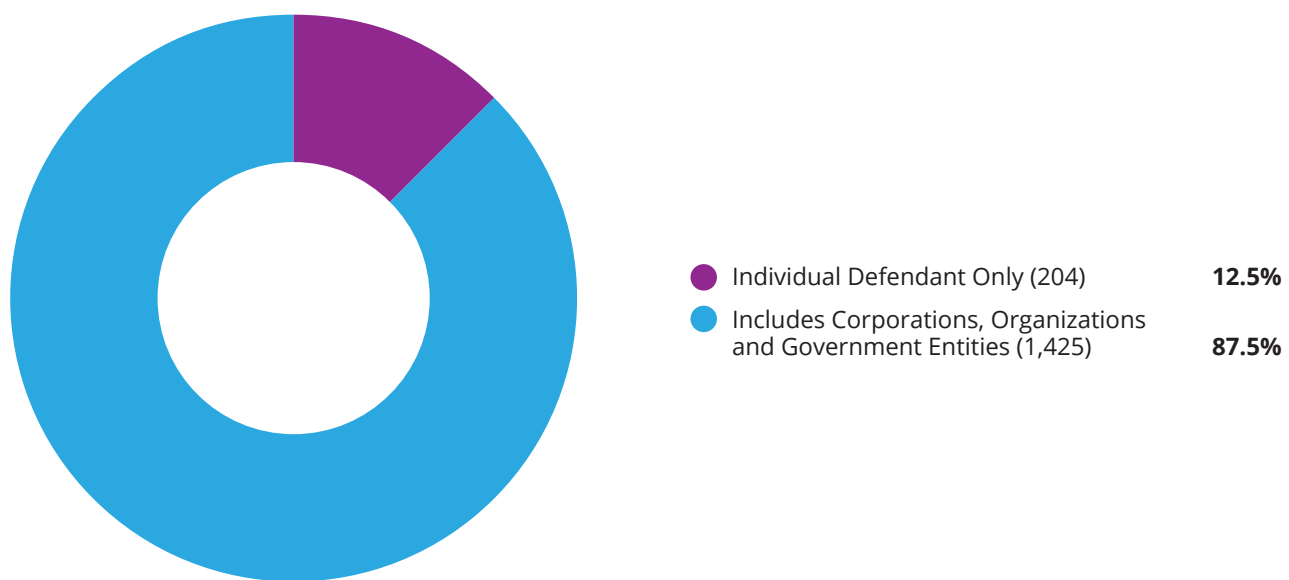


Dale Shoemaker, *New York's Largest ICE Prison Dodged by Allegations of Shoddy Medical Care*, THE INTERCEPT (Nov. 6, 2025), <https://theintercept.com/2025/11/06/batavia-ice-medical-care-buffalo/> (Photo credit J. Dale Shoemaker)

E. Defendants in Civil Trafficking Cases from 2003 to 2025

As of December 31, 2025, almost 88 percent of all civil trafficking cases involved at least one corporate or institutional defendant (1,425).⁸⁷ Of those cases, 969 included allegations of sex trafficking and 491 included allegations of forced labor. The proportion of total TVPRA cases brought solely against individual defendants declined from 15 percent in 2024 to less than 13 percent in 2025. Forced labor cases brought by domestic workers against diplomats and international organizational employees topped the list, accounting for 23 percent of cases filed against individual defendants between 2003 and 2025.

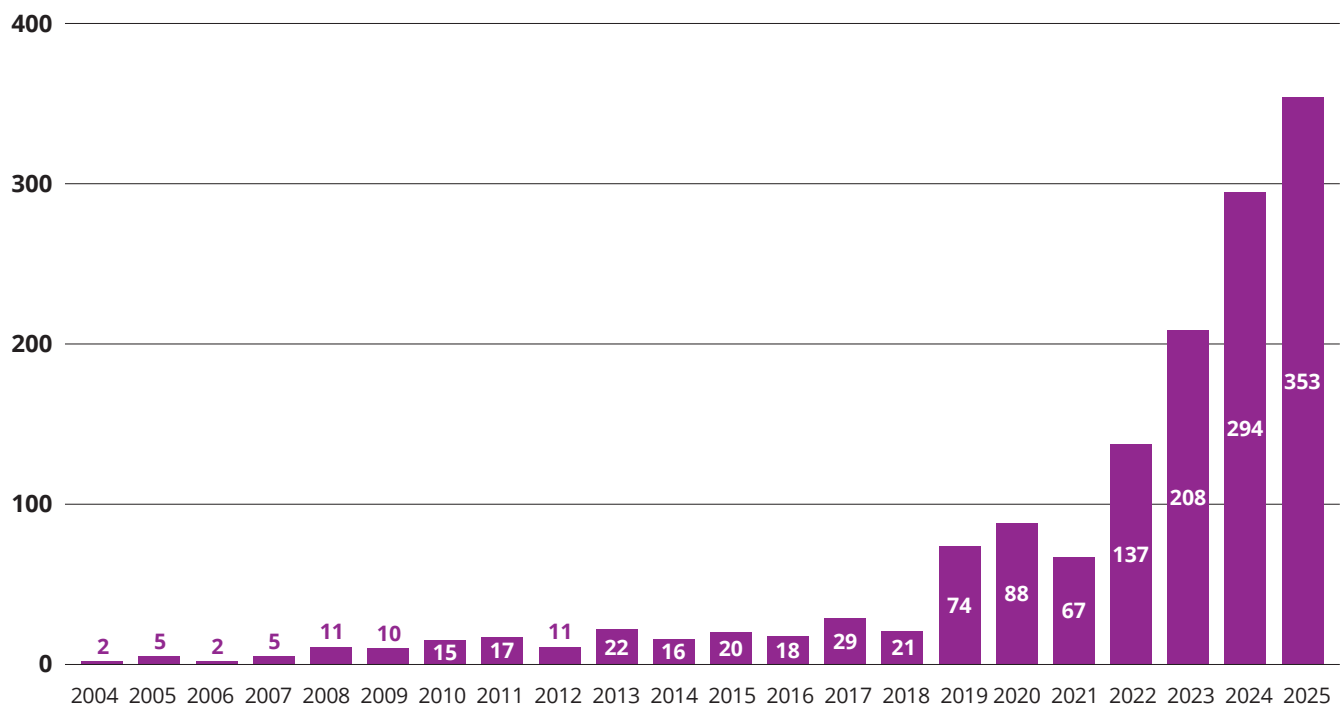
Figure 20: Civil Cases by Type of Defendant (2003-2025) (Total = 1,629)



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,⁸⁸ plaintiffs have brought cases against medical staffing agencies, academic institutions, and hotels, among many other corporate entities in federal courts. In all, plaintiffs filed 1,425 civil trafficking cases against corporate and institutional defendants between 2003 and 2025—934 cases alleging only sex trafficking, 456 cases alleging only forced labor, and 35 cases alleging both sex trafficking and forced labor. Of the 969 total sex trafficking cases against corporate and institutional defendants, 640 cases (66 percent) named hotel and hospitality industry defendants.⁸⁹

In 2025 alone, plaintiffs named corporate or institutional defendants in 353 of the total 371 cases filed. Of the 353 cases, 299 involved allegations of sex trafficking and 64 involved allegations of forced labor. Plaintiffs named hotel and hospitality industry defendants in nearly 71 percent of the sex trafficking cases filed in 2025 (212 of 299).

Figure 21: Civil Cases Against Corporate and Institutional Defendants by Year (2003-2025)
(Total = 1,425)



In 2025, with the surge in civil immigration detainees, corporate operators of for-profit detention facilities came under heavy scrutiny.⁹⁰ Plaintiffs did not file any new cases against these defendants in 2025,⁹¹ but three cases were on appeal and seven cases were either ongoing or administratively stayed at the close of 2025.⁹² These suits alleged that civil immigration detainees were forced to clean, cook, and do maintenance under threat of punishment and for little or no compensation. One case, *Menocal v. GEO Group, Inc.*, was argued before the U.S. Supreme Court in November 2025 to resolve a threshold immunity question that will likely impact all cases against for-profit detention facility operators.⁹³ Another case, *Ruderman v. Kenosha County*, was argued before the U.S. Court of Appeals for the Seventh Circuit in September 2025 to clarify the application of the TVPRA to civil immigration detainees forced to work in detention centers.⁹⁴ Finally, in *Yeend v. Akima Global Services, LLC*, a federal district court granted class certification under the TVPRA in March 2025,⁹⁵ adding to a growing body of cases in which for-profit detention operators must face forced labor allegations at scale.⁹⁶

IV. Forced Labor Cases from 2003 to 2025

A. Sectors in Forced Labor Cases from 2003 to 2025

Between 2003 and 2025, plaintiffs filed 654 cases involving allegations of forced labor—612 cases alleging forced labor and 42 cases alleging both forced labor and sex trafficking. The largest proportion of cases involving forced labor continued to be in the domestic work (over 20 percent) and agriculture (nearly 13 percent) sectors. In 2025, plaintiffs continued filing forced labor cases in the education and research sector, which rose to third highest overall (just over 10 percent), displacing the food service and hospitality sector, which fell to fourth (just under 10 percent). Healthcare and wellness rounded out the top five sectors at just over nine percent.

Of the 74 forced labor cases filed in 2025, the education and research sector accounted for the largest share, with 14 cases—more than double the seven cases filed in each of the next three sectors: healthcare and wellness, food service and hospitality, and the detention context. As in 2024, plaintiffs in 2025 filed the majority of cases in the education and research sector against the operators of teen rehabilitation programs (11 of 14). At the close of 2025, among all forced labor cases against teen rehabilitation programs, 17 cases were ongoing, 11 had been voluntarily dismissed with prejudice, 11 resulted in settlements (10 undisclosed, one disclosed), and six had been dismissed without prejudice.

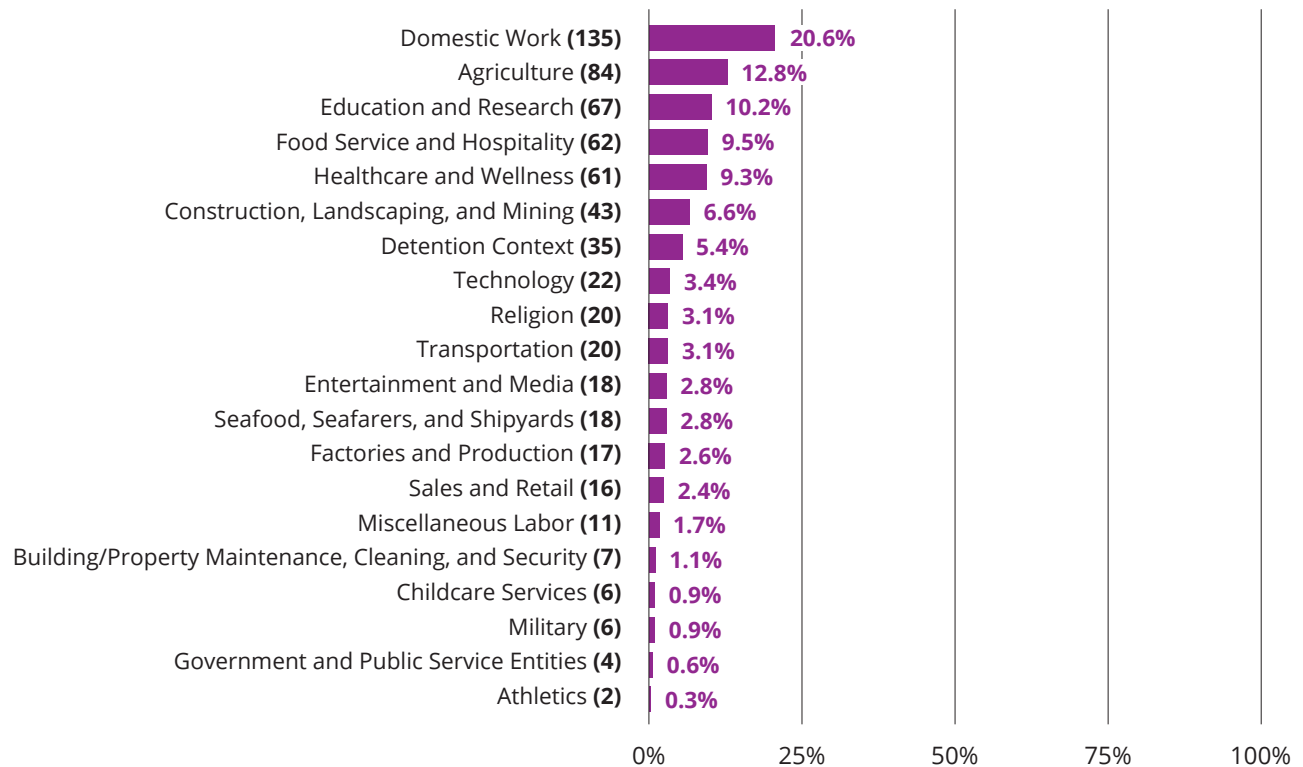
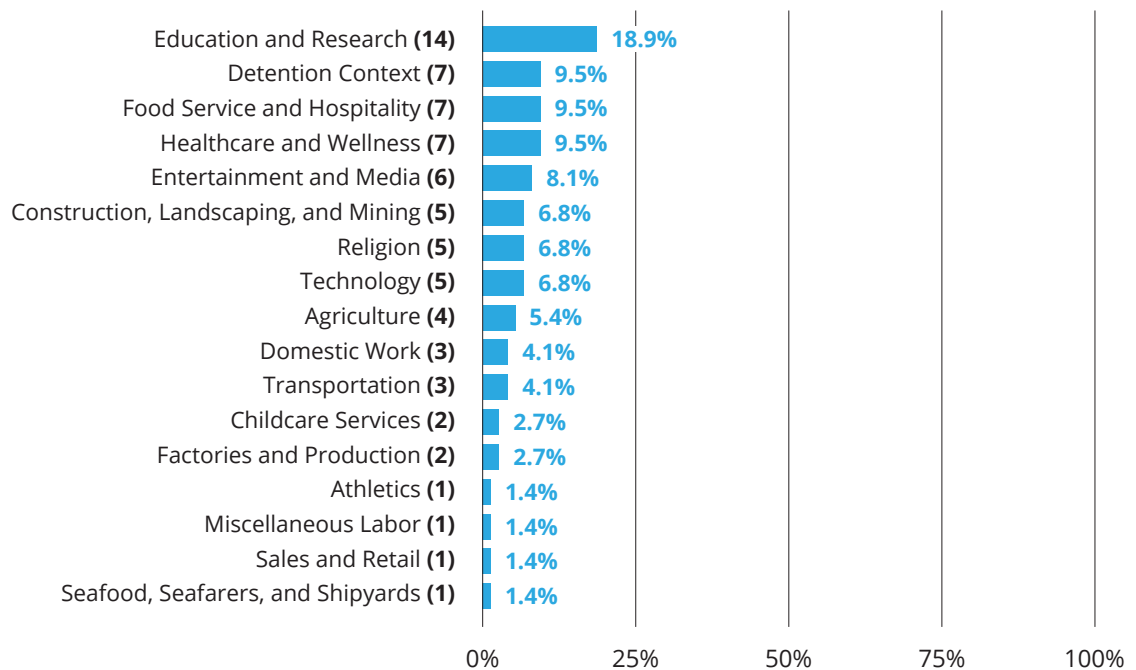


Lawsuit accusing ranch of forcing teens to do hard labor settles for \$2.3 million

Trinity Teen Solutions, a facility for troubled teens in Wyoming, closed in 2022 amid allegations of abusive treatment.



Kingkade, Tyler. *Lawsuit accusing ranch of forcing teens to do hard labor settles for \$2.3 million*. NBC News (June 12, 2025), <https://www.nbcnews.com/news/us-news/wyoming-troubled-teen-program-settles-lawsuit-trinity-teen-solutions-rcna212633> (Photo courtesy of Mary Higgins).

Figure 22: Forced Labor Cases by Sector* (2003-2025) (Total = 654)⁹⁷**Figure 23: Forced Labor Cases by Sector (2025)* (Total = 74)⁹⁸**

*"Sector" refers to the actual sector or industry in which the plaintiff was forced to work. See Appendices: Sector Definitions in Forced Labor Cases for a list of case types included in each sector.

Sherman v. Trinity Teen Solutions Inc.

The first civil trafficking case against a teen rehabilitation program, *Sherman v. Trinity Teen Solutions, Inc.*, was filed in 2020.⁹⁹ The case was resolved in September 2025. The U.S. District Court for the District of Wyoming approved a class action settlement of \$2.3 million under the TVPRA.¹⁰⁰ The class comprised of 262 women who, as minors, had been sent by their parents to the defendants' Wyoming ranch, marketed as a therapeutic wilderness treatment center.¹⁰¹ Rather than providing therapy, the defendants allegedly forced the plaintiffs to perform extensive agricultural and manual labor under threats of physical punishment, humiliation, starvation, and isolation.¹⁰² Although the district court initially denied class certification, the Tenth Circuit vacated and remanded, finding that the lower court had applied the wrong standard.¹⁰³ On remand, the district court granted class certification, and 17 months later, the court approved the class settlement.¹⁰⁴ The settlement was slated to be paid by the defendants' insurance carrier.¹⁰⁵



Tyler Kingkade, *Lawsuit Accusing Ranch of Forcing Teens to Do Hard Labor Settles for \$2.3 Million*, NBC News (June 12, 2025), <https://www.nbcnews.com/news/us-news/wyoming-troubled-teen-program-settles-lawsuit-trinity-teen-solutions-rcna212633> (Photo courtesy of Kelsie VanMeveren)



US Supreme Court to review GEO Group's loss in immigrant detainee forced labor case

By Daniel Wiessner

June 2, 2025 1:47 PM EDT · Updated June 2, 2025

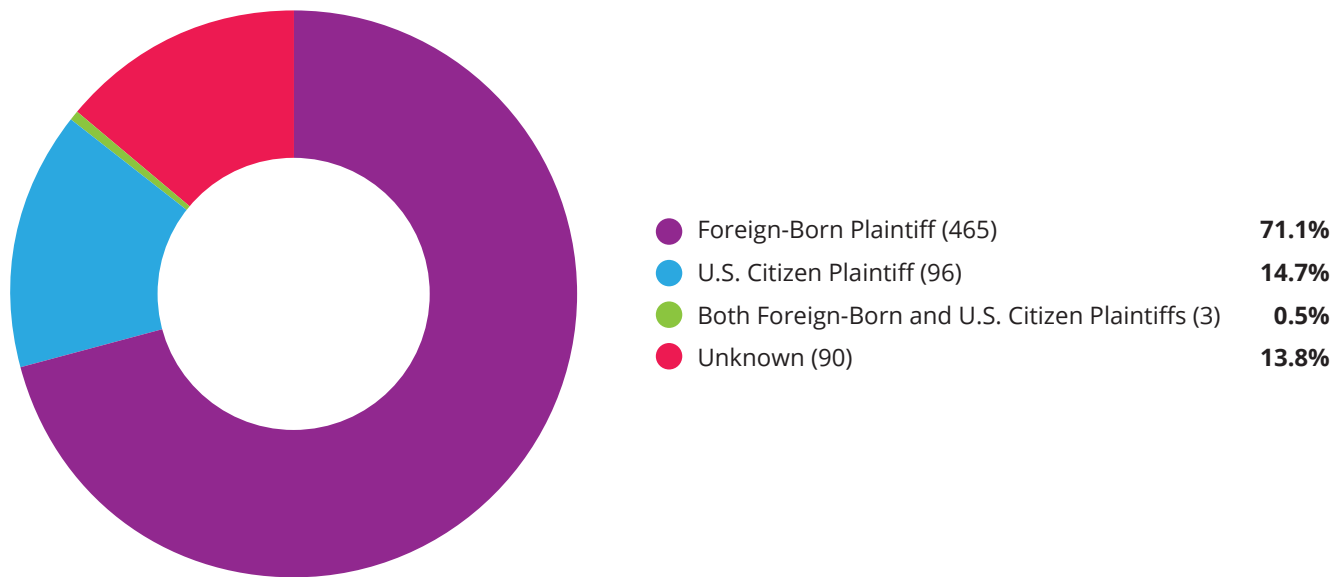


Quinn Glabicki. Daniel Wiessner, *US Supreme Court to Review GEO Group's Loss in Immigrant Detainee Forced Labor Case*, REUTERS (June 2, 2025), <https://www.reuters.com/legal/government/us-supreme-court-review-geo-groups-loss-immigrant-detainee-forced-labor-case-2025-06-02/>

B. Plaintiff's Immigration Status and Citizenship in Forced Labor Cases from 2003 to 2025

Between 2003 and 2025, foreign-born plaintiffs filed the majority of civil cases alleging forced labor (468 of 654, or over 71 percent). U.S. citizen plaintiffs accounted for only 15 percent of all forced labor filings at the close of 2025 (99 of 654).

Figure 24: Forced Labor Cases by Plaintiff's Immigration Status and Citizenship (2003-2025)
(Total = 654)



1. Foreign-Born Plaintiffs in Forced Labor Cases

Most foreign-born plaintiffs in forced labor cases entered the United States with a valid visa or other legal status. In fact, where the plaintiff's method of entry could be ascertained, 93 percent of cases involved plaintiffs who entered the country legally (365 of 391). The defendant employers in these cases frequently misused legal immigration programs to abuse and exploit the workers. The three most common work-based 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). The largest visa category overall was B-1/B-2 visas (67 cases). These visas are reserved for business, tourism, or domestic workers accompanying non-resident employers to the U.S. Of the 67 cases in this category, 49 alleged forced labor of domestic workers.

In 2025, foreign-born plaintiffs filed 35 forced labor cases across a variety of sectors, including healthcare and wellness (6), food service and hospitality (5), technology (4), and construction, landscaping, and mining (4). Among the six cases filed in the healthcare and wellness sector, four cases were filed by plaintiffs entering on work-based visas—two involving EB-1/EB-2/EB-3 visas and two involving H-1B visas. In all four cases alleging forced labor in the technology sector, some or all plaintiffs initially entered the U.S. on F-1 student visas. Finally, three of the four cases in the construction, landscaping, and mining sector alleged forced labor outside of the U.S.

Gomez-Echeverria v. Purpose Point Harvesting, LLC

In June 2025, a jury in the U.S. District Court for the Western District of Michigan awarded \$570,256.34 in damages under the TVPRA to Guatemalan farmworkers on H-2A visas.¹⁰⁶ The court found that the employer abused the very program meant to protect the workers. In *Gomez-Echeverria v. Purpose Point Harvesting, LLC*, the defendant, a farm labor contractor, recruited the workers to various Michigan farms, then confiscated their passports, controlled their bank accounts, and charged illegal recruitment fees.¹⁰⁷ Using these tools of control and coercion, the defendants overworked and underpaid the workers and threatened removal from the H-2A program if they complained.¹⁰⁸ The defendants appealed this case to the U.S. Court of Appeals for the Sixth Circuit in November 2025, after the district court denied their motion for a new trial.¹⁰⁹

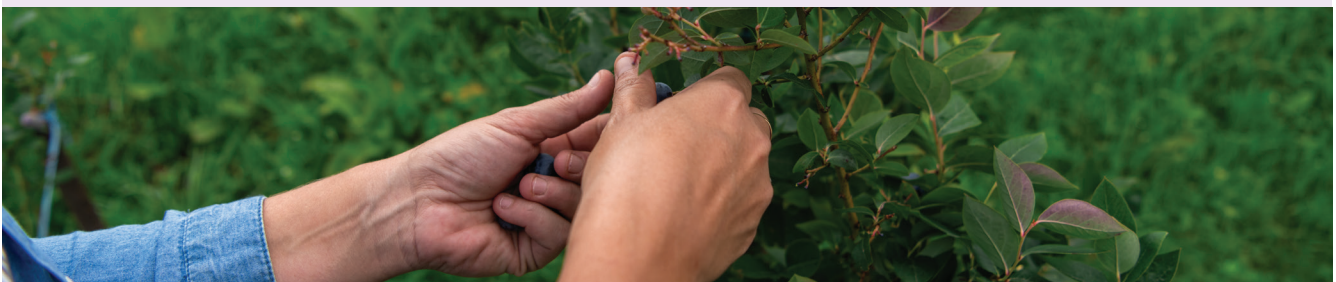


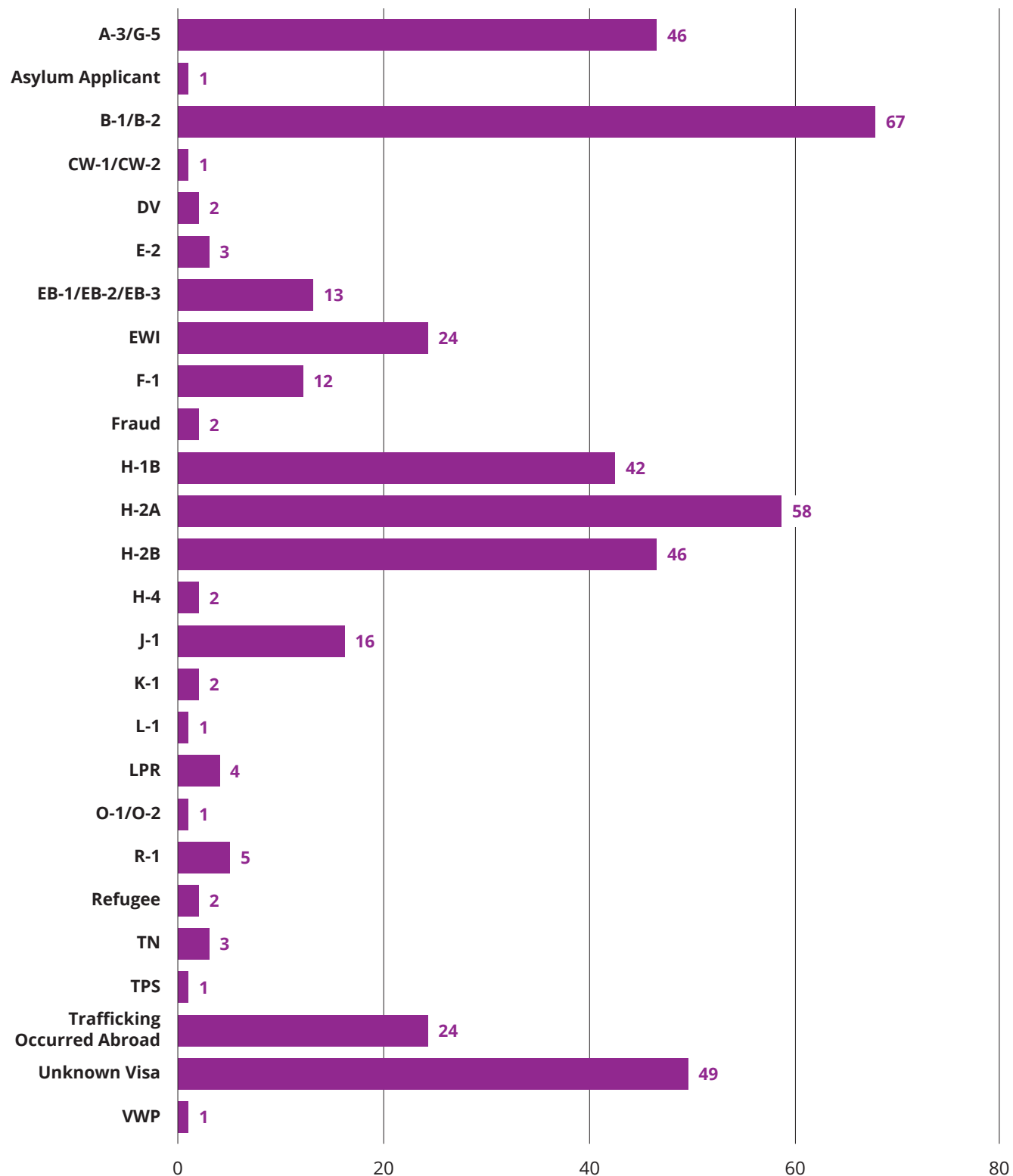
Figure 25: Forced Labor Cases by Plaintiff's Immigration or Visa Status (2003-2025)¹¹⁰

Figure 26: Immigration and Visa Statuses in Forced Labor Cases (2003-2025)

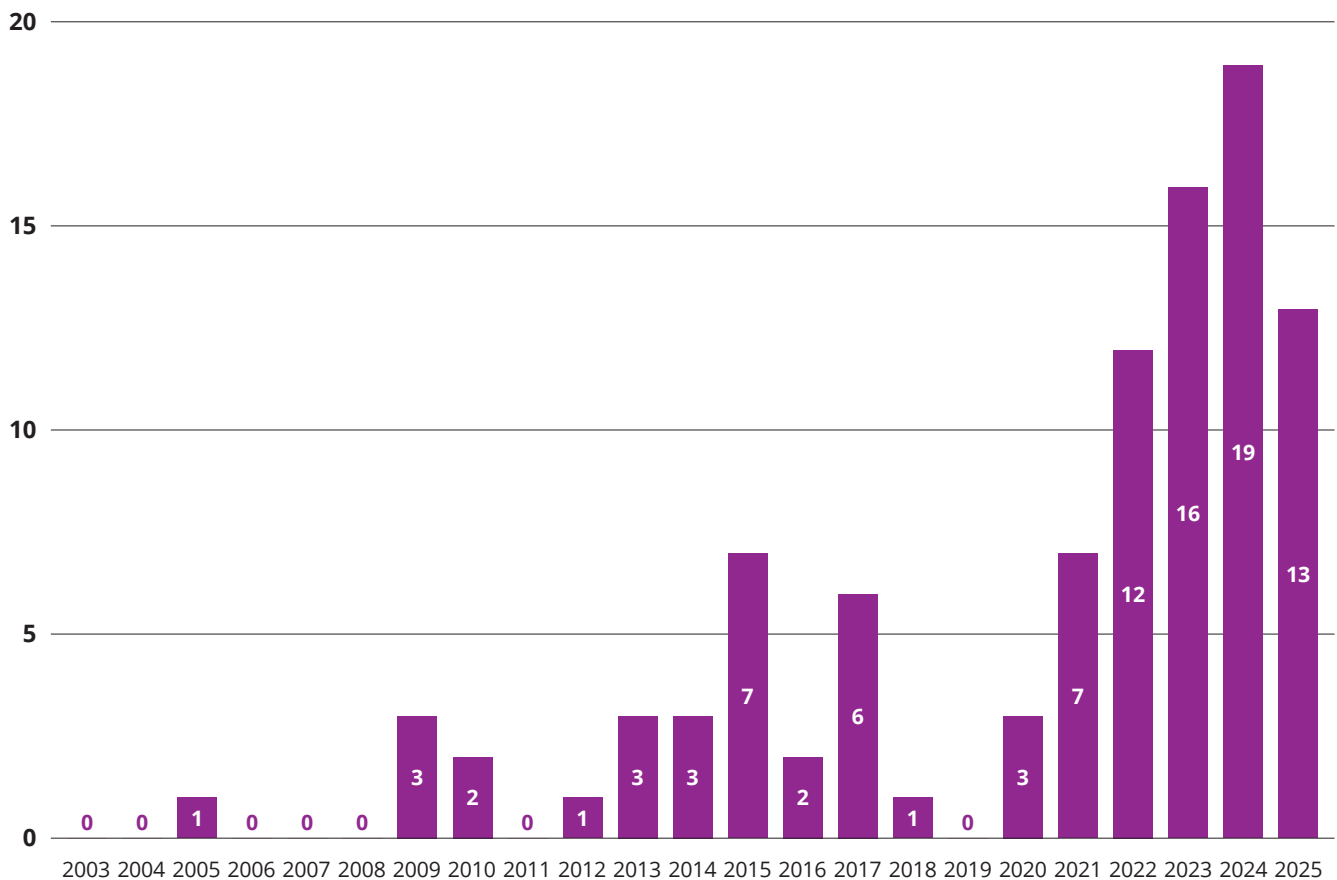
Type	Recipients	# of labor cases	% of total labor cases
A-3/G-5	Domestic workers of foreign diplomats or employees of international organizations	46	10.7%
Asylum Applicant	Plaintiff requested asylum upon entering the United States	1	0.2%
B-1/B-2	Visitors for business or tourism and domestic workers	67	15.7%
CW-1/CW-2	CNMI-only transitional workers	1	0.2%
DV	Diversity Immigrant Visa recipients	2	0.5%
E-2	Investors in U.S. businesses	3	0.7%
EB-1/EB-2/EB-3	Persons of extraordinary ability in the sciences, arts, education, business, or athletics	13	3.0%
EWI	Plaintiff entered the United States without inspection	24	5.6%
F-1	Student Visa holders	12	2.8%
Fraud	Plaintiff entered the United States with another individual's documentation	2	0.5%
H-1B	Highly-skilled specialized workers	42	9.8%
H-2A	Seasonal agricultural workers	58	13.6%
H-2B	Temporary non-agricultural workers	46	10.7%
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	3.7%
K-1	Fiancé(e)s of U.S. citizens	2	0.5%
L-1	Intracompany transferees	1	0.2%
LPR	Long-Term Permanent Residents	4	0.9%
O-1/O-2	Individuals with extraordinary ability or achievement	1	0.2%
R-1	Nonimmigrant religious workers	5	1.2%
Refugee	Plaintiff entered the United States as a refugee	2	0.5%
TN	Nonimmigrant NAFTA professionals	3	0.7%
TPS	Temporary Protected Status recipients	1	0.2%
Trafficking Occurred Abroad	Victims of trafficking occurring outside the United States	24	5.6%
Unknown Visa	Immigrants with an unknown visa classification	49	11.4%
VWP	Plaintiff entered under the Visa Waiver Program	1	0.2%



2. U.S. Citizen Plaintiffs in Forced Labor Cases

U.S. citizens also continued to file forced labor cases, though fewer than in recent years. In the preceding three years, from 2022 to 2024, U.S. citizens brought an average of 16 forced labor cases each year. In 2025, U.S. citizens filed 13 cases involving forced labor, primarily in the detention context (6), as well as two cases each against the operators of teen rehabilitation programs and against religious organizations. In total, U.S. citizens had filed 99 forced labor cases as of December 31, 2025, or about 17 percent of total forced labor cases where the immigration or visa status of the plaintiff was publicly disclosed (564).

Figure 27: Forced Labor Cases Filed by U.S. Citizen Plaintiffs by Year (2003-2025) (Total = 99)

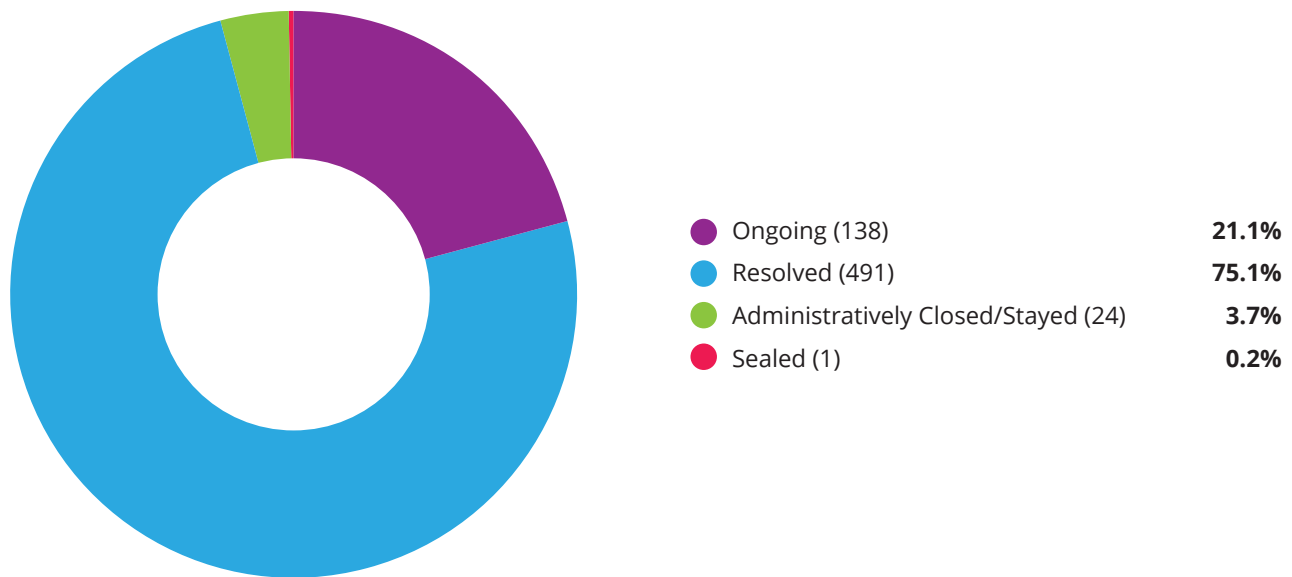
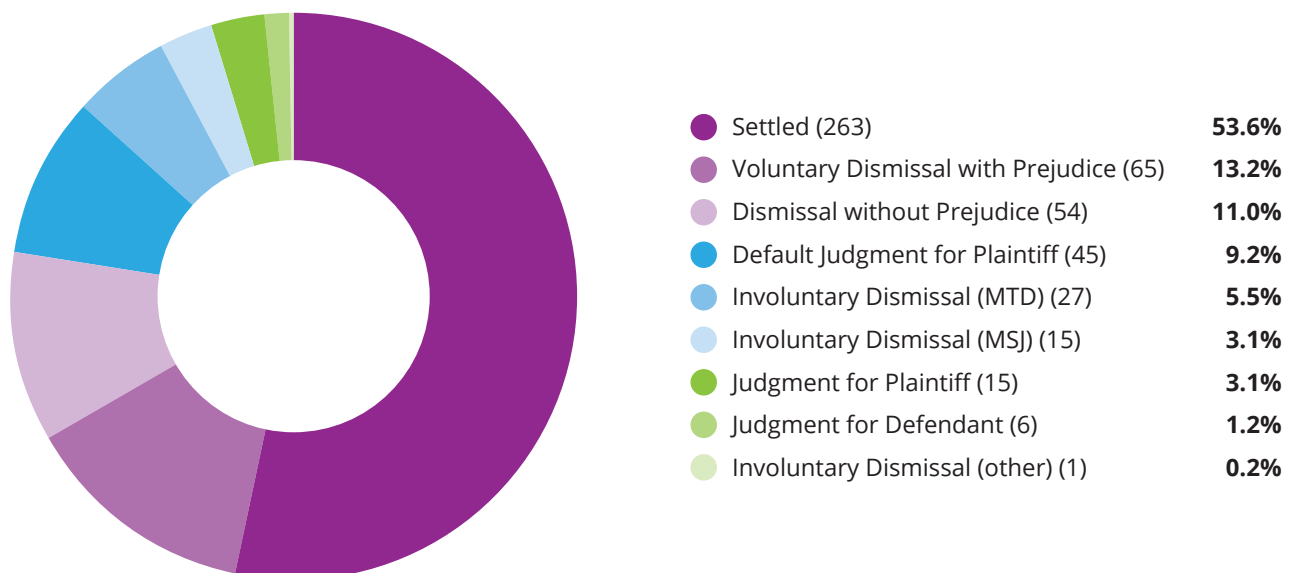


C. Outcomes in Forced Labor Cases from 2003 to 2025

As of December 31, 2025, 323 forced labor cases filed resulted in favorable outcomes for plaintiffs whereas only 49 resulted in unfavorable outcomes.¹¹¹ Specifically, 40 percent of all forced labor cases resulted in settlements (263). Courts decided nine percent of forced labor cases in favor of the plaintiffs through default judgment (45), or through summary judgment, judgment on the pleadings, or judgment at trial (15). Conversely, federal courts decided less than eight percent of all forced labor cases in favor of the defendants (49) through involuntary dismissals, judgment on the pleadings, or judgment at trial. In addition, courts dismissed more than eight percent of forced labor cases without prejudice (54), enabling plaintiffs the opportunity to refile their claims. In total, federal courts awarded a total of \$453,188,462.28 in damages across 130 cases involving allegations of forced labor filed between 2003 and 2025.

Maslic v. Ism Vuzem d.o.o.

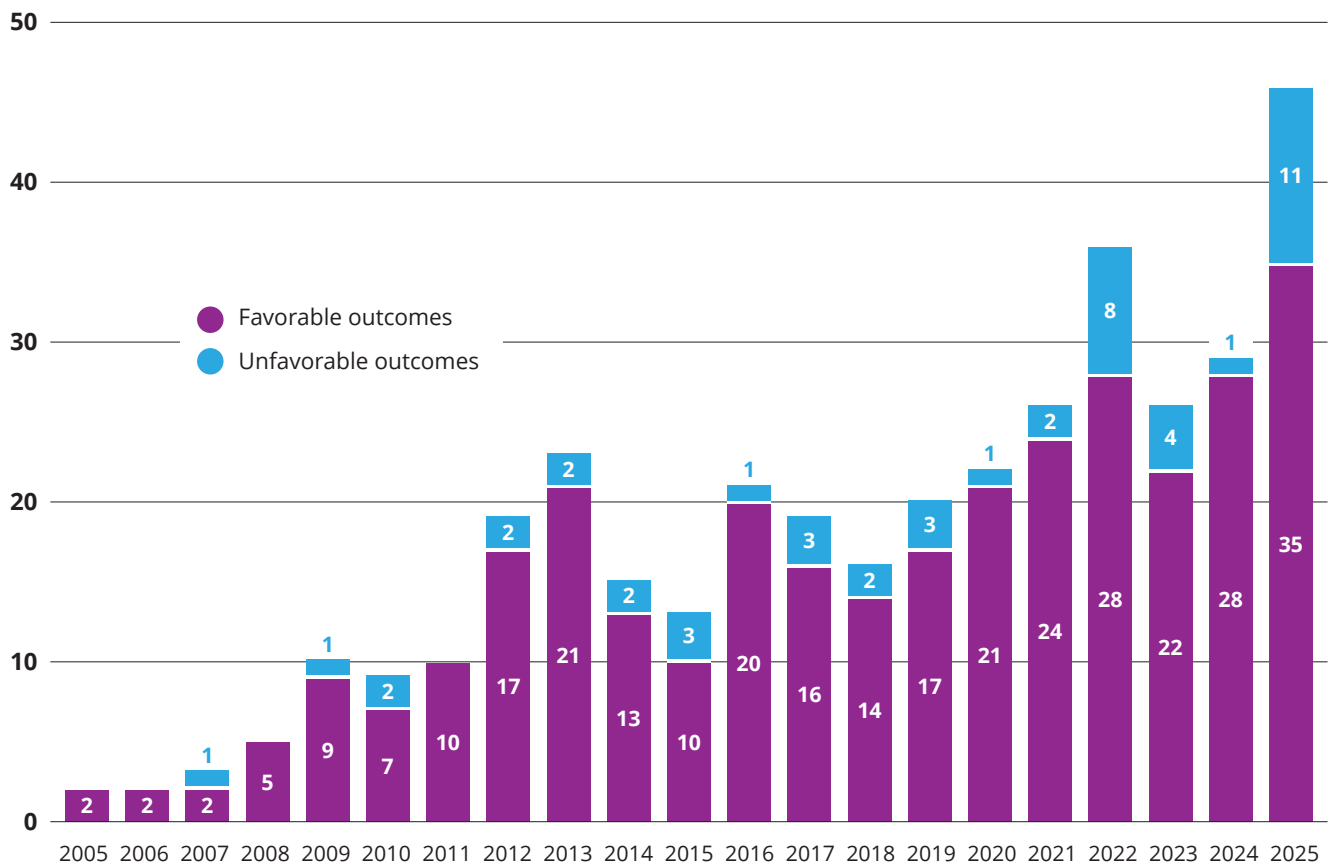
In 2025, the largest award in a forced labor case came from a default judgment against Slovenian labor contractors and Tesla's general contractor. *Maslic v. Ism Vuzem d.o.o.* was brought by 14 individuals and a class of 177 workers from Bosnia and Herzegovina, the Republic of Slovenia, and Croatia who were transported to the United States to perform labor at a Tesla facility in Fremont, CA.¹¹² The plaintiffs worked more than eight hours a day, six or seven days a week.¹¹³ They were not paid minimum or overtime wages.¹¹⁴ They did not have rest breaks.¹¹⁵ One of the individual plaintiffs asserted a forced labor claim under the TVPRA because the defendants threatened him with serious harm if he did not work.¹¹⁶ In August 2025, the U.S. District Court for the Northern District of California entered a default judgment for the plaintiffs, totaling \$13,747,480.17.¹¹⁷ On the TVPRA claim, the court awarded \$2.5 million in compensatory damages, largely due to the plaintiff's long-term disability after enduring horrible work conditions, and an equal amount in punitive damages.¹¹⁸ The total judgment was also the second-largest award among all civil trafficking cases in 2025.

Figure 28: Forced Labor Cases by Status as of Year-End 2025 (2003-2025) (Total = 654)**Figure 29: Resolved Forced Labor Cases by Outcome (2003-2025) (Total = 491)**



In 2025 alone, 35 forced labor cases resolved favorably for plaintiffs, as opposed to 11 resolving unfavorably for plaintiffs. Of the 35 favorable outcomes, 21 were confidential settlements, seven were publicly disclosed settlements, five were default judgments for the plaintiff, and two were judgments for the plaintiff after jury trial. Plaintiffs in 2025 won \$25,366,256.08 in damages and public settlements across the 13 forced labor cases with publicly available awards.¹¹⁹ The amounts ranged from \$28,500 to \$13,747,480.17.

Figure 30: Forced Labor Cases by Favorable/Unfavorable Outcome and Year (2003-2025) (Total = 372)

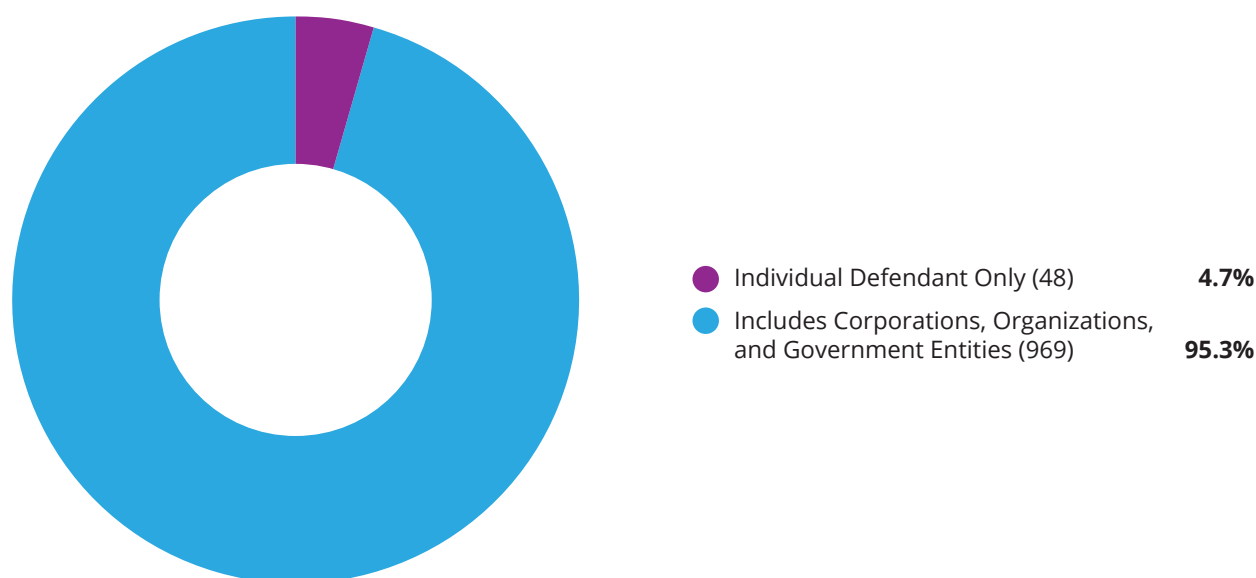


V. Sex Trafficking Cases from 2003 to 2025

A. Types of Defendants in Sex Trafficking Cases from 2003 to 2025

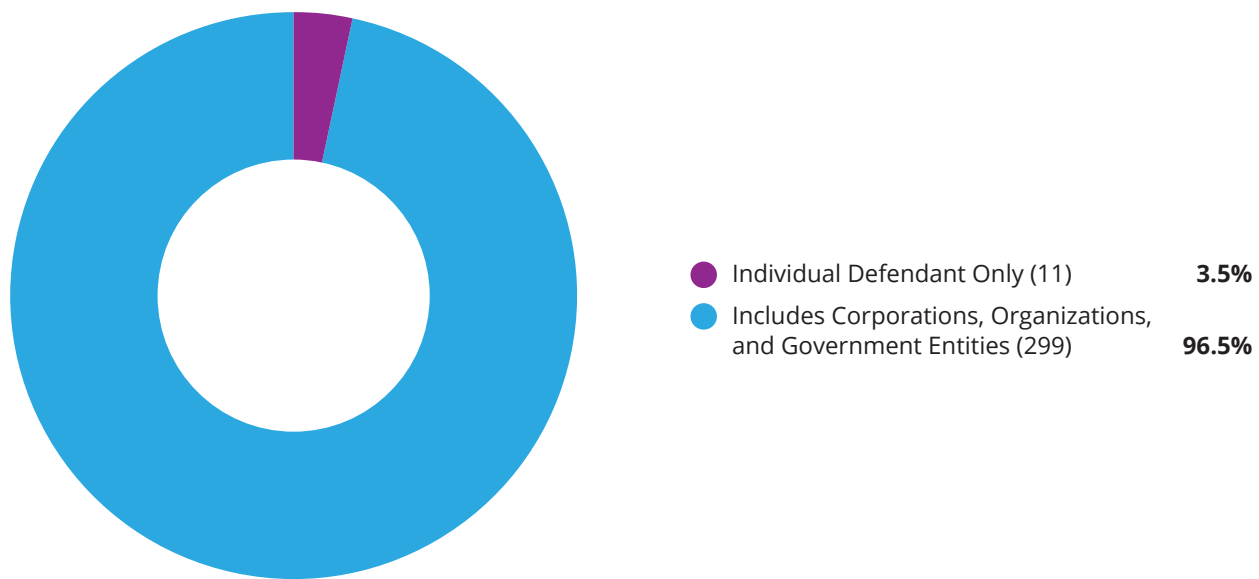
Between 2003 and 2025, plaintiffs filed 1,017 federal civil cases alleging sex trafficking. The total proportion of sex trafficking cases brought against corporate and institutional defendants increased from 94 percent in 2024 (670 of 707 cases) to 95 percent in 2025 (969 of 1,017 cases). As of December 31, 2025, plaintiffs had filed only 48 sex trafficking cases against individual defendants.

Figure 31: Sex Trafficking Cases by Type of Defendant (2003-2025) (Total = 1,017)



In 2025, plaintiffs filed 310 civil cases alleging sex trafficking. The vast majority of these cases (299 of 310)—over 96 percent—involved at least one corporate or institutional defendant, including hotels, motels, hospitality franchises, banks, and internet service providers. Eleven cases named individuals as the sole defendants in 2025.

Figure 32: Sex Trafficking Cases by Type of Defendant (2025) (Total = 310)

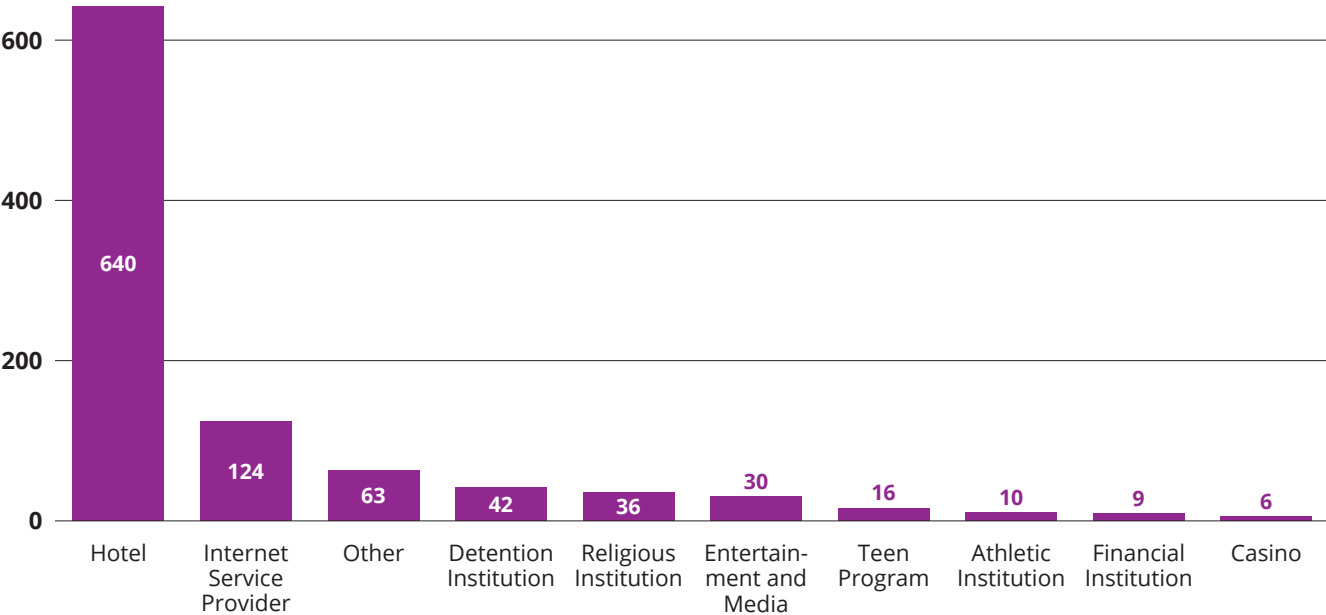


Pictured Below: Home in the Harvest Homes network. Figure 7, Complaint at 24, *Barbu v. Harvest Christian Fellowship*, No. 5:25-cv-02428 (C.D. Cal.)



Hotels and the hospitality industry remained the largest category of corporate and institutional defendants in civil sex trafficking cases by a large margin. Between 2003 and 2025, plaintiffs filed 640 cases alleging sex trafficking against the hotel industry, or 63 percent of all civil sex trafficking cases. The next largest categories of corporate and institutional defendants in sex trafficking cases were internet service providers (124 cases),¹²⁰ detention institutions (42 cases), religious institutions (36 cases), and entertainment and media defendants (30 cases).

Figure 33: Sex Trafficking Cases by Type of Corporate and Institutional Defendant (2003-2025)



Plaintiffs filed more sex trafficking cases against hotels and the hospitality industry in 2025 than in any previous year (212). Plaintiffs also increased the number of filings against other categories of corporate and institutional defendants, with 87 cases filed in 2025 compared to 59 in 2024. Among these 87 cases, 25 each were filed against detention institutions and religious institutions and organizations; plaintiffs filed an additional 14 cases against internet service providers.¹²¹ These filings brought detention institutions and religious institutions into the top five categories of corporate and institutional defendants, overtaking entertainment and media companies.

Among the 25 new filings against detention institutions, 22 cases involved allegations of sex trafficking and other abuses that occurred at federal correctional institutions, primarily FCI Dublin. The majority of the new filings against religious institutions contained similar allegations against Harvest Christian Fellowship, a Christian church based in California, and associated individuals (22 cases).¹²² The plaintiffs in the Harvest Christian Fellowship cases—male and female citizens of Romania—alleged that they were sexually abused as children while residing at Harvest Homes, a network of orphanages and foster homes in Romania operated by the defendants.¹²³ The abuse allegedly occurred under the guise of punishment.¹²⁴ Despite reports of their abuse, the leadership at Harvest Christian Fellowship allegedly did nothing.¹²⁵ As mentioned previously, these cases invoked the extraterritoriality provision of the TVPRA (18 U.S.C. § 1596) because the conduct occurred in Romania at the hands of a U.S. national.¹²⁶

The cases against Harvest Christian Fellowship continued a pattern of cases against religious institutions and organizations first identified in 2024. Sex trafficking cases against religious institutions and organizations now outnumber forced labor cases against these defendants—a reversal from the distribution seen at the close of 2024.¹²⁷ In total, by the end of 2025, plaintiffs had filed 54 total cases against religious institution defendants—34 alleging only sex trafficking, 18 alleging only forced labor, and two alleging both sex trafficking and forced labor.¹²⁸

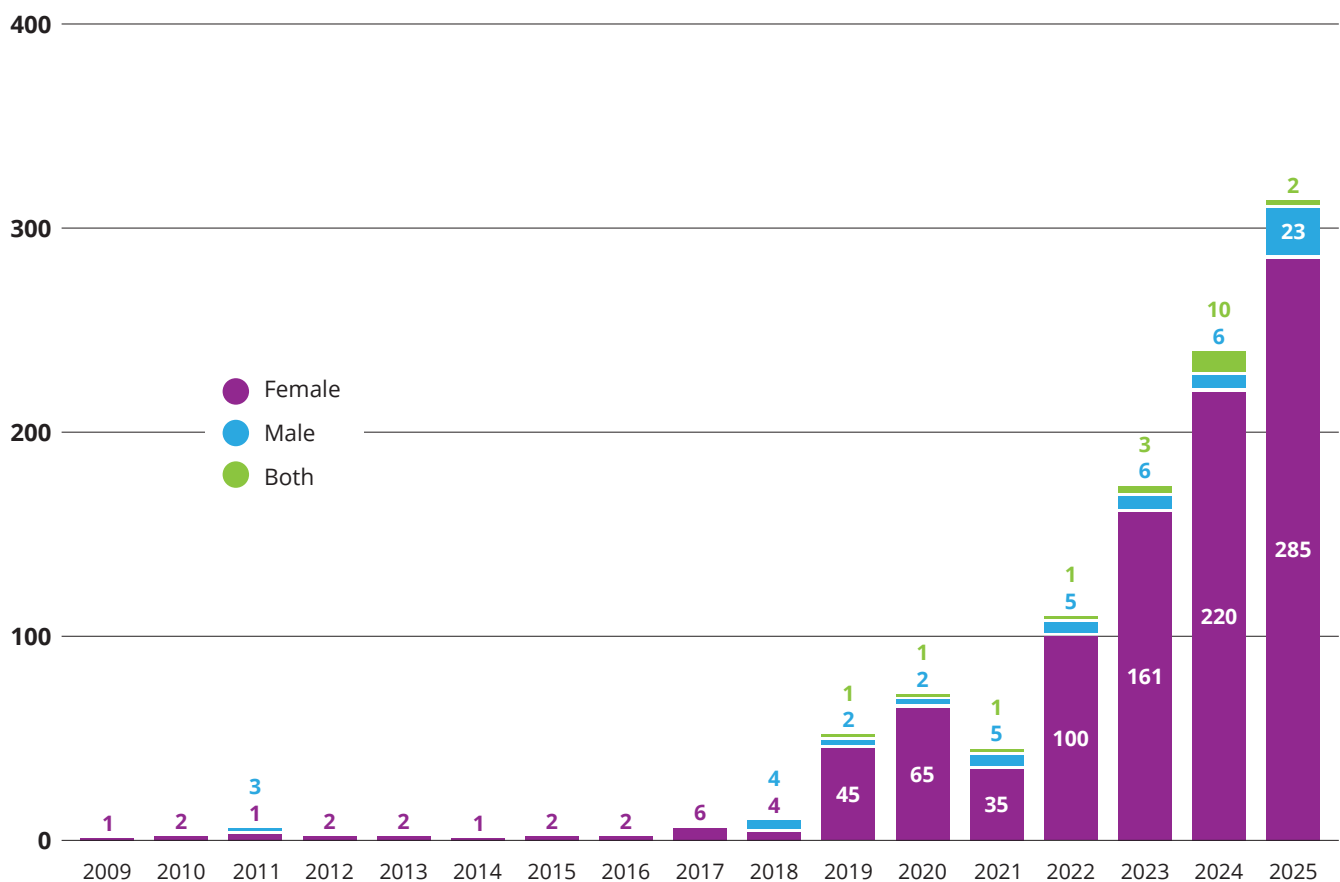




B. Plaintiffs in Sex Trafficking Cases from 2003 to 2025

The majority of plaintiffs in sex trafficking cases are female, but more male plaintiffs filed sex trafficking cases in 2025 than in any other year.¹²⁹ In 2025 alone, male plaintiffs filed 25 cases involving allegations of sex trafficking.¹³⁰ In total, at the close of 2025, male plaintiffs had filed 73 cases alleging sex trafficking, primarily in the last eight years. Plaintiffs have brought these cases against several types of defendants, including religious institutions, teen rehabilitation programs, internet service providers, and individuals and companies in the entertainment and media industry.

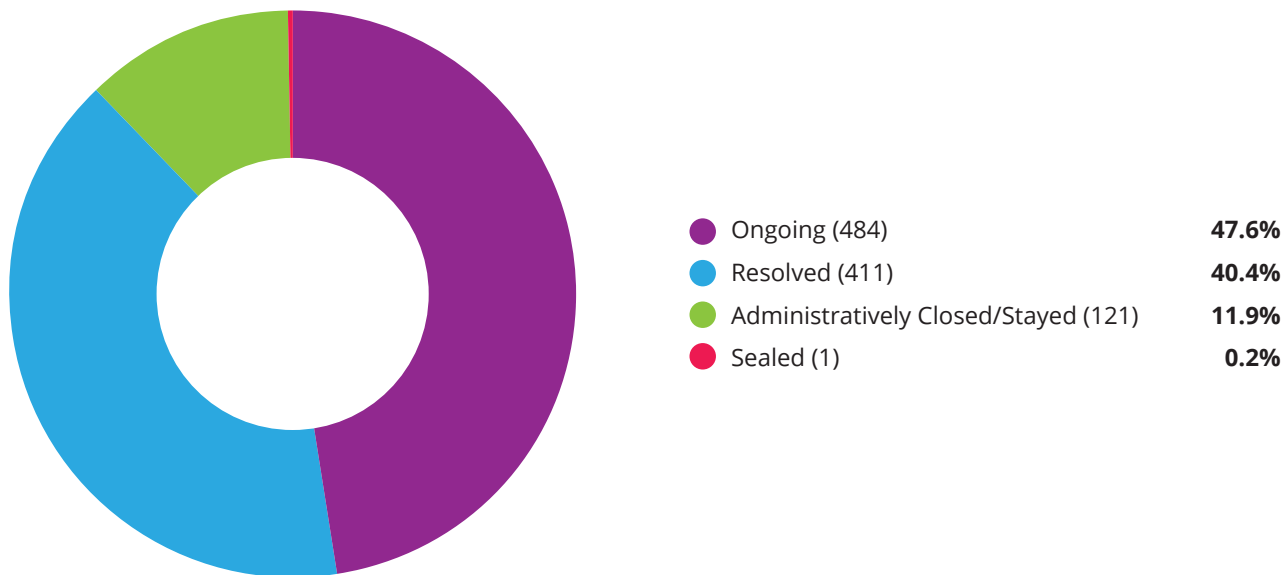
Figure 34: Sex Trafficking Cases by Plaintiff's Gender and Year (2003-2025) (Total = 1,009)¹³¹



C. Outcomes in Sex Trafficking Cases from 2003 to 2025

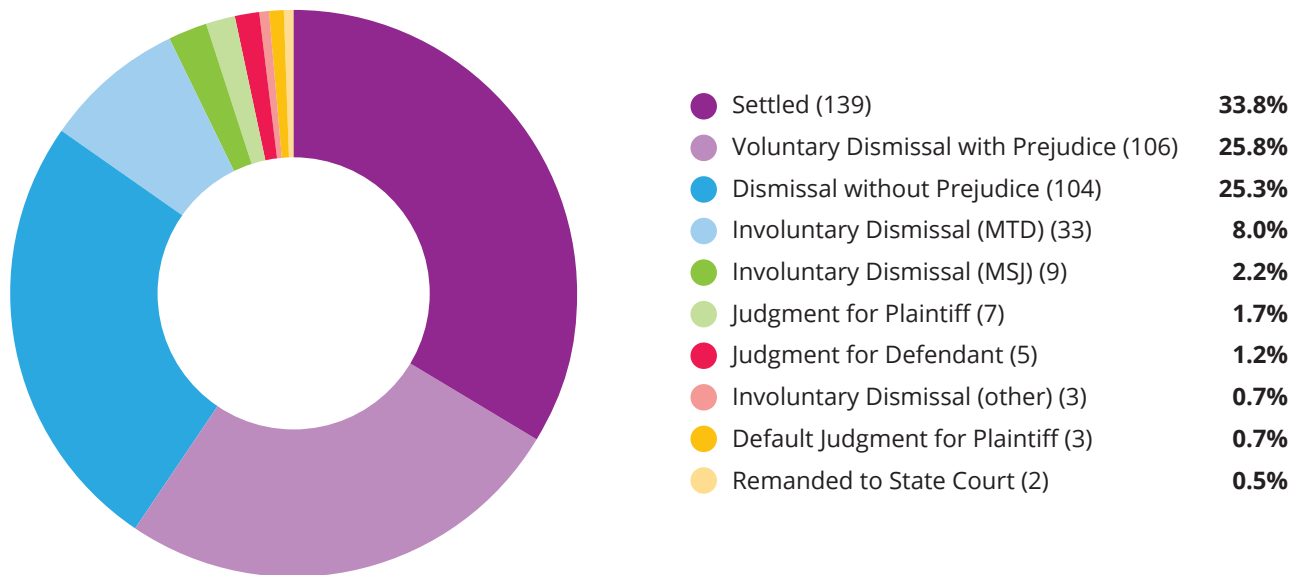
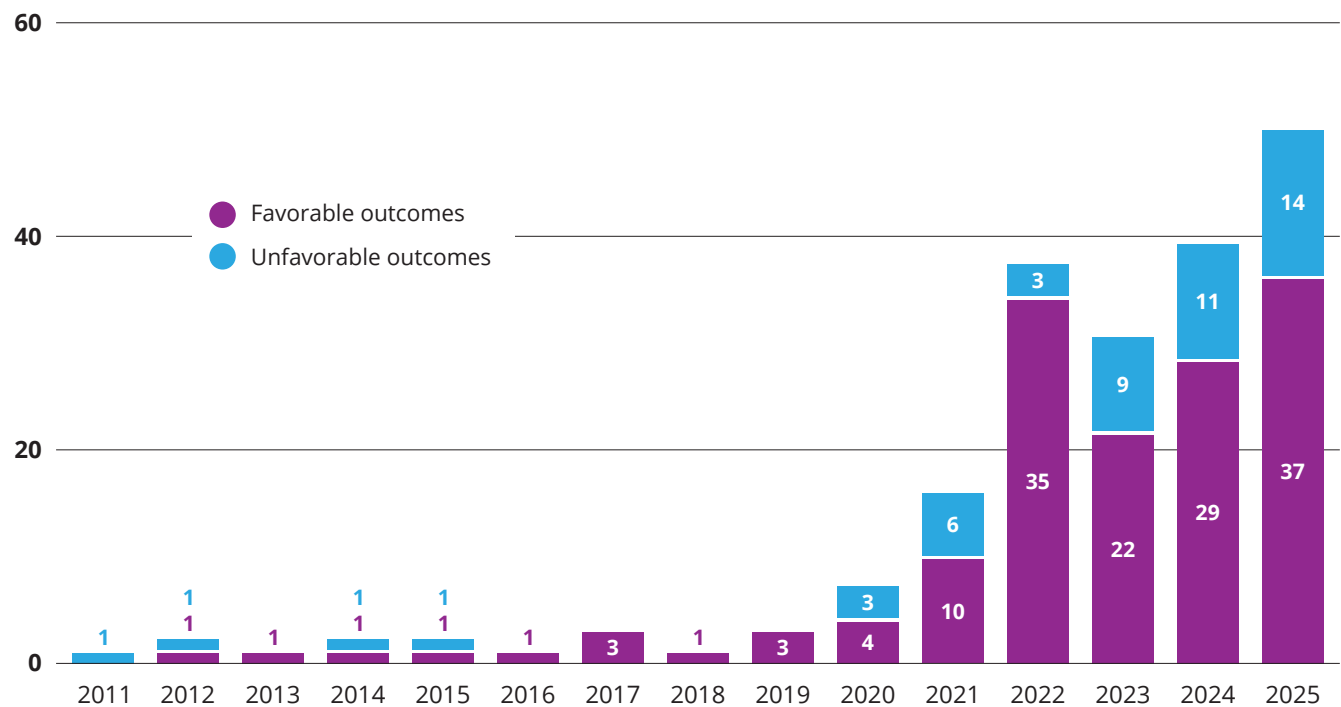
At the close of 2025, nearly half of all sex trafficking cases ever filed were still ongoing (484 of 1,017). This reflected the surge in the number of sex trafficking cases filed in recent years. Additionally, 121 sex trafficking cases remained administratively closed or stayed at the end of 2025.

Figure 35: Sex Trafficking Cases by Status as of Year-End 2025 (2003-2025) (Total = 1,017)



Of the 411 sex trafficking cases that were resolved between 2003 and 2025, more resulted in favorable outcomes for plaintiffs than unfavorable ones.¹³² Nearly 28 percent of cases were resolved in favor of plaintiffs, primarily through settlement (139), as well as through default judgment (3) and judgment for the plaintiff through summary judgment, judgment on the pleadings, or judgment at trial (7). All but six of the 139 settlements were confidential. There were no settlements with publicly disclosed terms in sex trafficking cases in 2025, aside from one case that provided only non-monetary relief in the form of improvements and protections for prisoners formerly housed at FCI Dublin.¹³³

Nine percent of sex trafficking cases resolved between 2003 and 2025 resulted in unfavorable outcomes for plaintiffs (50). Courts also ordered almost 19 percent of cases (104) dismissed without prejudice, an outcome that provided plaintiffs with the opportunity to refile their claims.

Figure 36: Resolved Sex Trafficking Cases by Outcome (2003-2025) (Total = 411)**Figure 37: Sex Trafficking Cases by Favorable/Unfavorable Outcome and Year (2011-2025) (Total = 199)¹³⁴**

The most notable shift in sex trafficking cases at the end of 2025, however, was the sharp increase in cases that courts administratively closed or stayed. As of December 31, 2025, 121 sex trafficking cases remained administratively closed or stayed, more than half involving internet service providers (63). Nearly all of those cases implicated Salesforce or Backpage (61). Courts consolidated 50 of those cases under three lead cases.¹³⁵ Courts stayed nine cases against Salesforce and Backpage—those three lead cases plus six others—under Section 1595(b) pending criminal actions against Backpage and its founders.¹³⁶

Significantly, nearly half of all administrative closures or stays in sex trafficking cases occurred in 2025 alone (56). This shift was largely due to 39 pending mediations or settlements in sex trafficking cases filed against hotels and the hospitality industry.¹³⁷

These mediations, in turn, shifted the overall outcome trends for sex trafficking cases filed against hotels and the hospitality industry. As previously noted, plaintiffs filed 212 cases involving allegations of sex trafficking against corporate defendants in the hotel and hospitality industry in 2025, bringing the total number of these cases up to 640. As of December 31, 2025, approximately 53 percent of these cases remained ongoing (344 of 642). Of the 298 sex trafficking cases against hotels that resolved between 2003 and 2025, approximately 32 percent of sex trafficking cases settled (96) and nearly 22 percent were voluntarily dismissed with prejudice (65).¹³⁸ Finally, courts administratively closed or stayed 16 percent of sex trafficking cases against hotels (48), largely due to mediation or pending settlements (39), but also for other reasons, such as bankruptcy proceedings (3) and criminal proceedings (2).

Despite the indications that numerous sex trafficking cases filed against hotels and the hospitality industry have settled, it was difficult to discern whether the plaintiffs made any monetary recovery. Settlement terms remained confidential and sealed. Since 2003, there has been just one sex trafficking case against a corporate hotel defendant with a publicly disclosed settlement amount. In that settlement, the trafficking survivor plaintiff received \$100,000.¹³⁹

However, in 2025, for the first time, a sex trafficking case filed under the TVPRA against a hotel went to a jury. In *J.G. v. Northbrook Industries, Inc.*, a jury in U.S. District Court for the Northern District of Georgia awarded \$40 million to the plaintiff, a minor sex trafficking victim.¹⁴⁰ This jury verdict was both the largest damages award in 2025 and the only publicly available monetary award for a plaintiff in a sex trafficking case in 2025.

In total, plaintiffs have won a total of \$567,415,299.60 in damages through public settlements and judgments in 16 sex trafficking cases filed between 2003 and 2025.¹⁴¹ The average award across these 16 cases was \$35,463,456.23.

J.G. v. Northbrook Industries, Inc.

After five years of litigation, the first sex trafficking case filed under the TVPRA against a hotel to go to a jury ended in July 2025 with a \$40 million verdict.¹⁴² This was the largest verdict in a sex trafficking case in the history of the TVPRA. In *J.G. v. Northbrook Industries, Inc.*, the plaintiff was trafficked for commercial sex as a minor at the United Inn & Suites hotel in Decatur, Georgia.¹⁴³ The complaint alleged that hotel staff knew of the abuse and allowed it to continue.¹⁴⁴ A jury in the U.S. District Court for the Northern District of Georgia awarded \$10 million in compensatory damages and \$30 million in punitive damages.¹⁴⁵

The Atlanta Journal-Constitution

METRO ATLANTA

Historic \$40M sex trafficking verdict reached as next trial nears

United Inn & Suites in DeKalb is liable for its alleged involvement in a teenager's exploitation, jurors decide.



Rosie Manins, *Historic \$40M Sex Trafficking Verdict Reached as Next Trial Nears*, ATLANTA J.-CONST. (July 14, 2025), <https://www.ajc.com/news/2025/07/historic-40m-sex-trafficking-verdict-reached-as-next-trial-nears/> (Photo credit Abbey Cutrer)¹⁴⁶

VI. Conclusion

In 2025, trafficking survivors continued to build on the momentum of recent years, using the TVPRA to demand accountability from a wide array of individual and corporate defendants. Plaintiffs again filed a record number of federal civil trafficking cases in 2025. But the most important story of 2025 was the cases that plaintiffs won.

A landmark sex trafficking jury verdict against a hotel defendant in 2025 sent a powerful message to the hospitality industry. The impact of the \$40 million verdict in *J.G. v. Northbrook Industries, Inc.* is likely to reverberate well beyond the Northern District of Georgia. With 39 cases pending in mediation and settlement negotiations against hotels and hospitality franchises, and with new cases filed each week, the verdict has the potential to upend the patterns of settlement and dismissal.

This case is an outlier in more ways than one: there is a profound lack of visibility into the outcomes of sex trafficking cases against hotels. Although plaintiffs continued to file in large numbers against the hotel and hospitality industry, and although numerous cases ended in settlements or voluntary dismissals, there has only been one other publicly disclosed award in a sex trafficking case against a hotel. That award—\$100,000—may or may not be typical. Evidence suggests that while some cases have settled for large sums, many others have settled for less, and insurance companies may be funding these awards.¹⁴⁷ The opacity in sex trafficking case outcomes stands in sharp contrast to forced labor litigation, where public damages awards and settlements provide insight into the tangible, concrete relief delivered to survivors.

That concrete relief was reflected in significant class-wide recoveries for survivors of forced labor in 2025. Filipino nurses in *Carmen v. Health Carousel, LLC*, as well as teenagers forced into a rehabilitation program in *Sherman v. Trinity Teen Solutions Inc.*, secured significant class settlements in 2025, recovering \$6,050,000 and \$2,300,000 in public settlements, respectively. Civil immigration detainees who alleged forced labor in detention facilities in *Yeend v. Akima Global Services* won class certification in the Northern District of New York. These class action victories signaled that the TVPRA is capable of delivering systemic relief to larger groups of survivors in forced labor cases. These class wins also occurred in sectors where TVPRA litigation is relatively new, reflecting the willingness of courts to hold institutional defendants accountable at scale across an expanding range of industries.

In 2025, plaintiffs established that accountability is not limited to conduct on U.S. soil. Courts handed survivors doctrinal victories in cases invoking extraterritorial jurisdiction, cases in which the alleged trafficking occurred abroad. *Angga v. Bumble Bee Foods, LLC*, a TVPRA case brought by Indonesian fishers alleging forced labor on fishing vessels, and *F.C. v. Jacobs Solutions Inc.*, involving migrant workers who alleged forced labor while building stadiums for the 2022 World Cup in Qatar, both survived motions to

dismiss in 2025. As plaintiffs and their attorneys test the global reach of the TVPRA, the statute is becoming an increasingly vital tool for survivors to hold traffickers—and those who benefit financially—accountable, even beyond U.S. borders.

For more than twenty years, trafficking survivors and their attorneys—many of them pro bono counsel—have transformed the TVPRA's civil remedy into one of the most consequential tools for holding traffickers and their facilitators accountable. The increased number of filings, the expanding sectors, the class-wide relief, the precedent-setting wins, taken together, they tell the story of a legal movement that is delivering significant results. Trafficking survivors have confronted their traffickers in federal court with extraordinary success. Survivors have demanded an end to impunity. And in 2025, survivors made clear that they are not just filing cases—they are winning them.



Understanding labor trafficking laws as litigation surges

By Chelsea Mikula, Joseph Manno and Elisabeth Arko

August 7, 2025 9:38 AM EDT · Updated August 7, 2025



Chelsea Mikula, Joseph Manno & Elisabeth Arko, *Understanding Labor Trafficking Laws as Litigation Surges*, REUTERS (Aug. 7, 2025), <https://www.reuters.com/legal/legalindustry/understanding-labor-trafficking-laws-litigation-surges-2025-08-07/> (Photo credit: Dado Ruvic / Illustration)

VII. Methodology

The Human Trafficking Legal Center maintains a comprehensive database of civil human trafficking cases filed in U.S. federal courts under 18 U.S.C. § 1595. As of December 31, 2025, the database contained 1,629 cases. Our goal is to capture every case filed using the TVPRA's civil remedy in the federal court system, and we employ a multi-source search strategy to that end—drawing on several major legal databases to identify newly filed cases. Our methodology also requires transparency when we discover cases previously omitted.

Despite these efforts, our case identification methods have inherent limitations. As we continue to refine our search methods and expand our sources, we occasionally discover cases from prior years that were not captured at the time. When this occurs, we add those cases to the database retroactively and incorporate them into our reporting.

Each year, in preparation for this report, we conduct a systematic review of all cases in the database that remain unresolved or are currently on appeal. This review is designed to ensure that the status of every case accurately reflects developments through December 31 of the prior year. We update case outcomes, appellate decisions, and other relevant information as part of this process.

Unless otherwise noted, the data in this report reflect federal civil trafficking cases filed as of December 31, 2025, and the status of all filed cases as of that date. This report also incorporates updates and corrections to data reported in prior years, including cases filed before 2025 that were identified through our continuous review process.

In conducting a detailed review of federal civil trafficking cases, we identified 28 additional cases that had not been included in prior reports. We also removed three cases previously included in past reports and added 21 consolidated cases due to plaintiffs' subsequent amendment of the operative complaint to include a TVPRA claim. Of the 28 newly added cases, three were forced labor cases, one each filed in 2018, 2020, and 2022; one was a sex trafficking case filed in 2023; and 24 cases were filed in 2024—19 sex trafficking, three forced labor, and two alleging both sex trafficking and forced labor. We also removed three sex trafficking cases included in prior reports after further review, one filed in 2020 and two filed in 2022. The case filed in 2020 was removed because it was filed as a duplicate case. One case filed in 2022 was removed because the complaint was amended to remove the TVPRA claim prior to any defendants appearing in the case, and the other case filed in 2022 was erroneously included. Finally, 21 sex trafficking cases against Salesforce were added to the data set. These cases were filed and consolidated in 2023, but they were not captured at the time of filing because the operative complaints did not originally include a claim under the TVPRA. Plaintiffs amended their complaints in 2025 to add that claim.

VIII. Appendices

Federal Civil Trafficking Cases Filed by Year and Type (2003-2025)

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	29*	-	37
2019	47	39	1	87
2020	66* ¹⁴⁸	31*	2	99
2021	43	42	-	85
2022	104* ¹⁴⁹	37*	5	146
2023	159*	49	12	220
2024	229*	68*	7*	304
2025	297	61	13	371
Total	975	612	42	1,629

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

Federal Civil Trafficking Cases Filed by State or Territory (2003-2025)

State	# of cases	State	# of cases
Alabama	14	Nebraska	2
Alaska	4	Nevada	21
Arizona	7	New Hampshire	1
Arkansas	16	New Jersey	47
California	190	New Mexico	4
Colorado	31	New York	201
Connecticut	17	North Carolina	25
Delaware	0	North Dakota	5
District of Columbia	26	Northern Mariana Islands	4
Florida	164	Ohio	111
Georgia	119	Oklahoma	6
Guam	0	Oregon	16
Hawaii	1	Pennsylvania	26
Idaho	2	Puerto Rico	0
Illinois	33	Rhode Island	1
Indiana	22	South Carolina	14
Iowa	7	South Dakota	3
Kansas	4	Tennessee	17
Kentucky	12	Texas	238
Louisiana	17	Utah	10
Maine	4	Vermont	0
Maryland	21	U.S. Virgin Islands	3
Massachusetts	23	Virginia	38
Michigan	18	Washington	23
Minnesota	16	West Virginia	2
Mississippi	4	Wisconsin	7
Missouri	28	Wyoming	4
Montana	0		

Federal Civil Trafficking Cases Filed by State or Territory (2025)

State	# of cases	State	# of cases
Alabama	0	Nebraska	1
Alaska	0	Nevada	8
Arizona	3	New Hampshire	0
Arkansas	0	New Jersey	15
California	69	New Mexico	1
Colorado	6	New York	21
Connecticut	2	North Carolina	11
Delaware	0	North Dakota	1
District of Columbia	4	Northern Mariana Islands	0
Florida	33	Ohio	28
Georgia	28	Oklahoma	1
Guam	0	Oregon	1
Hawaii	0	Pennsylvania	7
Idaho	0	Puerto Rico	0
Illinois	11	Rhode Island	0
Indiana	8	South Carolina	1
Iowa	1	South Dakota	0
Kansas	0	Tennessee	2
Kentucky	1	Texas	67
Louisiana	1	Utah	3
Maine	1	Vermont	0
Maryland	4	U.S. Virgin Islands	0
Massachusetts	8	Virginia	5
Michigan	2	Washington	5
Minnesota	3	West Virginia	1
Mississippi	0	Wisconsin	1
Missouri	4	Wyoming	1
Montana	0		

Total Damages in Federal Civil Trafficking Cases (2003-2025)¹⁵⁰

Year Cases Resolved	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*	\$8,860,374.05	3
2009	\$9,000,966.58	3
2010	\$500,000.00	1
2011*	\$2,080,110.72	2
2012*	\$21,248,173.93	8
2013*	\$11,373,326.68	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*	\$9,378,374.87	7
2019	\$66,038,495.59	11
2020*	\$184,447,070.75	7
2021	\$14,427,179.87	11
2022*	\$35,822,556.22	12
2023*	\$519,183,668.97	10
2024*	\$20,445,342.53	20
2025	\$65,366,256.08	14
Total	\$1,016,660,895.93	145

* These numbers have been updated to correct awards previously identified or reflect awards that had not been previously identified.

Federal Civil Trafficking Cases Invoking Extraterritorial Jurisdiction Under 18 U.S.C. § 1596 by Year and Type (2009-2025)

Year	Forced Labor	Sex Trafficking	Both Forced Labor and Sex Trafficking	Total
2009	-	-	-	0
2010	-	-	-	0
2011	1	1	-	2
2012	1	-	-	1
2013	-	-	-	0
2014	2	-	-	2
2015	3	-	-	3
2016	4	-	1	5
2017	1	-	-	1
2018	3	-	-	3
2019	1	-	-	1
2020	2	2	-	4
2021	1	1	-	2
2022	2	1	-	3
2023	1	1	-	2
2024	2	-	1	3
2025	6	22	1	29
Total	30	28	3	61

Sector Definitions in Forced Labor Cases

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. office buildings, parking garages); excludes private households
Childcare Services	Childcare services provided exclusively or primarily as a standalone service, including au pair, babysitting, and nannying in daycares and private households; excludes therapeutic or medical care for children with disabilities or special needs, which is coded under Healthcare and Wellness
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; excludes childcare provided as the sole or primary service, which is coded under Childcare Services
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 specialized care services for individuals with disabilities or special needs, including minors
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

Forced Labor Cases by Sector (2003-2025)

Sector	# of cases filed
Domestic Work	135
Agriculture	84
Education and Research	67
Food Service and Hospitality	62
Healthcare and Wellness	61
Construction, Landscaping, and Mining	43
Detention Context	35
Technology	22
Religion	20
Transportation	20
Entertainment and Media	18
Seafood, Seafarers, and Shipyards	18
Factories and Production	17
Sales and Retail	16
Miscellaneous Labor	11
Building/Property Maintenance, Cleaning, and Security	7
Childcare Services	6
Military	6
Government and Public Service Entities	4
Athletics	2
Total	654

Forced Labor Cases by Sector (2025)

Sector	# of cases filed in 2025
Education and Research	14
Detention Context	7
Food Service and Hospitality	7
Healthcare and Wellness	7
Entertainment and Media	6
Construction, Landscaping, and Mining	5
Religion	5
Technology	5
Agriculture	4
Domestic Work	3
Transportation	3
Childcare Services	2
Factories and Production	2
Athletics	1
Miscellaneous Labor	1
Sales and Retail	1
Seafood, Seafarers, and Shipyards	1
Total	74

IX. Endnotes

- 1 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.
- 2 Unless explicitly noted, references in this report to forced labor cases include cases alleging forced labor only or both forced labor and sex trafficking, and references to sex trafficking cases include cases alleging sex trafficking only or both forced labor and sex trafficking; mixed cases are therefore counted in both categories.
- 3 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”).
- 4 See Ashlyn Phelps, The Human Trafficking Legal Center, Using Civil Litigation to Combat Human Trafficking: Federal Human Trafficking Civil Litigation 2024 Data Update 6 (May 2025) (hereinafter, the “2024 Data Update”).
- 5 See Appendices: Federal Civil Trafficking Cases Filed by Year and Type (2003-2025) for the underlying data in tabular form.
- 6 The data discussed in this report reflect only case filings made in federal courts. Many states allow trafficking survivors to pursue a private right of action under their state’s analogue of the TVPRA.
- 7 See Appendices: Federal Civil Trafficking Cases Filed by State or Territory (2003-2025) for the underlying data in tabular form.
- 8 See Appendices: Federal Civil Trafficking Cases Filed by State or Territory (2025) for the complete underlying data.
- 9 Two cases in the data set are sealed and thus excluded from the count of ongoing, resolved, or administratively closed or stayed cases.
- 10 See *Carmen v. Health Carousel, LLC*, No. 1:20-cv-00313, 2025 WL 892586 at *7, *17 (S.D. Ohio Mar. 24, 2025).
- 11 See Complaint at 1, *Carmen*, No. 1:20-cv-00313 (S.D. Ohio Dec. 17, 2021).
- 12 See *id.* at 10-14.
- 13 See *id.* at 10-17, 32-36.
- 14 See First Amended Settlement Agreement, *Carmen*, No. 1:20-cv-00313 (S.D. Ohio June 4, 2024); Opinion and Order, *Carmen*, No. 1:20-cv-00313 (S.D. Ohio June 18, 2024) (preliminarily certifying two settlement classes); *Carmen*, No. 1:20-cv-00313, 2025 WL 892586 (S.D. Ohio Mar. 24, 2025) (approving final settlement).
- 15 An additional two cases were administratively stayed pending potential relation or consolidation with other cases and pending appointment of counsel.
- 16 See, e.g., Joint Motion to Stay Proceedings, *Doe (A.M.G.) v. G6 Hosp., LLC*, No. 1:24-cv-00222 (E.D. Tex. Aug. 1, 2025); Unopposed Motion to Stay Proceedings, *Doe (K.E.C.) v. G6 Hosp., LLC*, No. 1:23-cv-00270 (E.D. Tex. Dec. 5, 2025).
- 17 See, e.g., Joint Motion to Stay Proceedings, *Doe (P.T.) v. G6 Hosp., LLC*, No. 2:24-cv-00263 (S.D. Tex. Aug. 1, 2025); Unopposed Motion to Stay Proceedings, *Doe (A.N.S.) v. G6 Hosp., LLC*, No. 2:24-cv-03334 (D.S.C. Aug. 5, 2025).
- 18 18 U.S.C. § 1595(b)(1). Criminal action is defined to include both investigations and prosecutions. See 18 U.S.C. § 1595(b)(2).
- 19 Although a federal court in New York declared Jeffries unfit to stand trial in the related criminal action in May 2025, the government filed a Certificate of Restoration of Competency to Stand Trial in December 2025. See Exhibit to Letter at 3, *United States v. Jeffries*, No. 2:24-cr-00423 (E.D.N.Y. Dec. 10, 2025); see also Philip Marcelo, *Prison Officials Tell Judge Ex-Abercrombie & Fitch CEO Is Competent to Stand Trial*, AP NEWS, Dec. 10, 2025, <https://apnews.com/article/abercrombie-fitch-ceo-jeffries-sex-charges-35643f54017f37a0530c68766c860257>. A trial date has been set for October 26, 2026. See Minute Entry, *Jeffries* (Dec. 11, 2025).
- 20 A federal jury in New York convicted all three Alexander brothers on sex trafficking charges in March 2026. See *United States v. Alexander*, No. 1:24-cr-00676 (S.D.N.Y.); see also Debra Kamin, Kate Christobek, and Benjamin Weiser, *Alexander Brothers Found Guilty on All Counts in Sex-Trafficking Trial*, N.Y. TIMES, Mar. 9, 2026, <https://www.nytimes.com/2026/03/09/nyregion/verdict-alexander-brothers-sex-trafficking.html>. At the time of the publication of this report, their sentencing was scheduled for August 6, 2026. See Scheduling Order, *Alexander*, No. 1:24-cr-00676 (S.D.N.Y. Mar. 10, 2026).
- 21 See *infra* notes 22-25.
- 22 See *Fla. Abolitionist v. Backpage.com, LLC*, No. 6:17-cv-00218 (M.D. Fla. filed Feb. 7, 2017); *Doe 1 v. Backpage.com, LLC*, No. 1:17-cv-11069 (D. Mass. filed June 12, 2017); Press Release, U.S. Att’y’s Off., Dist. of Ariz., Justice

- Department Leads Effort to Seize Backpage.Com, the Internet's Leading Forum for Prostitution Ads, and Obtains 93-Count Federal Indictment (Apr. 9, 2018), <https://www.justice.gov/usao-az/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution>. See *Doe v. Epstein*, No. 1:17-cv-00616 (S.D.N.Y. filed Jan. 26, 2017); Press Release, U.S. Att'y's Off., S. Dist. of N.Y., Jeffrey Epstein Charged in Manhattan Federal Court with Sex Trafficking of Minors (July 8, 2019), <https://www.justice.gov/usao-sdny/pr/jeffrey-epstein-charged-manhattan-federal-court-sex-trafficking-minors>. See *Ventura v. Combs*, No. 1:23-cv-10098 (S.D.N.Y. filed Nov. 16, 2023); *Jones v. Combs*, No. 1:24-cv-01457 (S.D.N.Y. filed Feb. 26, 2024); *English v. Combs*, No. 1:24-cv-05090 (S.D.N.Y. filed July 3, 2024); *Richard v. Combs*, No. 1:24-cv-06848 (S.D.N.Y. filed Sep. 10, 2024); Press Release, U.S. Att'y's Off., S. Dist. of N.Y., Sean Combs Charged in Manhattan Federal Court with Sex Trafficking and Other Federal Offenses (Sep. 17, 2024), <https://www.justice.gov/usao-sdny/pr/sean-combs-charged-manhattan-federal-court-sex-trafficking-and-other-federal-offenses>. See *Bradberry v. Abercrombie & Fitch Co.*, No. 1:23-cv-09440 (S.D.N.Y. filed Oct. 27, 2023); Press Release, U.S. Att'y's Off., E. Dist. of N.Y., Former CEO of Abercrombie & Fitch and Two Other Individuals Charged with Sex Trafficking and Interstate Prostitution (Oct. 22, 2024), <https://www.justice.gov/usao-edny/pr/former-ceo-abcrombie-fitch-and-two-other-individuals-charged-sex-trafficking-and>. See *Doe v. Medeiros*, No. 1:20-cv-24357 (S.D. Fla. filed Oct. 22, 2020); *Doe 1 v. Fitzgerald*, No. 2:20-cv-10713 (C.D. Cal. filed Nov. 24, 2020); Press Release, U.S. Att'y's Off., S. Dist. of N.Y., Canadian Fashion Executive Peter J. Nygard Charged with Sex Trafficking and Racketeering Offenses (Dec. 15, 2020), <https://www.justice.gov/usao-sdny/pr/canadian-fashion-executive-peter-j-nygard-charged-sex-trafficking-and-racketeering>. The 2024 Data Update noted the timing of the civil cases and criminal prosecutions against Sean "Diddy" Combs and Michael Jeffries. See 2024 Data Update at 29.
- 23 See *Marin-Santiago v. Canela*, No. 5:21-cv-00061 (S.D. Ga. filed Oct. 18, 2021); Press Release, U.S. Att'y's Off., S. Dist. of Ga., Human Smuggling, Forced Labor Among Allegations in South Georgia Federal Indictment (Nov. 22, 2021), <https://www.justice.gov/usao-sdga/pr/human-smuggling-forced-labor-among-allegations-south-georgia-federal-indictment>.
 - 24 See *Ross v. Jenkins*, No. 2:17-cv-02547 (D. Kan. filed Sep. 15, 2017) (United Nation of Islam case); Press Release, U.S. Att'y's Off., Dist. of Kan., Defendants Charged in Connection with Multi-State Forced Labor Conspiracy Involving the Forced Labor of Minor Victims (Oct. 27, 2021), <https://www.justice.gov/usao-ks/pr/defendants-charged-connection-multi-state-forced-labor-conspiracy-involving-forced-labor>. See *Martin v. La Luz Del Mundo*, No. 2:20-cv-01437 (C.D. Cal. filed Feb. 12, 2020); Press Release, U.S. Att'y's Off., Cent. Dist. of Cal., Leader of La Luz del Mundo Megachurch Charged by Federal Grand Jury with Producing and Possessing Child Sexual Abuse Material (Oct. 25, 2023), <https://www.justice.gov/usao-cdca/pr/leader-la-luz-del-mundo-megachurch-charged-federal-grand-jury-producing-and-possessing>; Press Release, U.S. Att'y's Off., S. Dist. of N.Y., Naasón Joaquín García Charged with Racketeering Conspiracy, Sex Trafficking, and Child Exploitation of Members of La Luz Del Mundo Church (Sep. 10, 2025), <https://www.justice.gov/usao-sdny/pr/naason-joaquin-garcia-charged-racketeering-conspiracy-sex-trafficking-and-child>.
 - 25 See *Singh v. Singh*, No. 3:23-cv-00339 (E.D. Va. filed May 22, 2023); Press Release, U.S. Dep't of Justice, Off. of Pub. Affs., Virginia Man and Woman Charged with Committing Forced Labor and Alien Harboring at Gas Station and Convenience Store for Multiple Years (July 19, 2023), <https://www.justice.gov/archives/opa/pr/virginia-man-and-woman-charged-committing-forced-labor-and-alien-harboring-gas-station-and>.
 - 26 See Complaint at 1-2, *Kumar v. BAPS Swaminarayan Sanstha, Inc.*, No. 3:21-cv-11048 (D.N.J. May 11, 2021); see also First Amended Complaint at 2-3, *Kumar*, No. 3:21-cv-11048 (D.N.J. Oct. 21, 2021).
 - 27 See Order at 2, *Kumar*, No. 3:21-cv-11048 (D.N.J. Nov. 23, 2021).
 - 28 See Order at 2, *Kumar*, No. 3:21-cv-11048 (D.N.J. Oct. 28, 2025).
 - 29 See Plaintiffs' Memorandum of Law in Support of Their Motion to Lift Stay or Alternatively to Sever at 6-7, *Kumar*, No. 3:21-cv-11048 (D.N.J. Sep. 12, 2025).
 - 30 See Complaint at 32-33, *Liu v. Wellmade Indus. Mfg. N.A. LLC*, No. 4:25-cv-00134 (N.D. Ga. May 27, 2025). See also Alani Letang, *Federal, Local Agencies Investigating Labor Trafficking Allegations at Bartow County Manufacturer*, ATLANTA NEWS FIRST, Mar. 26, 2025, <https://www.atlantaneewsfirst.com/2025/03/26/federal-local-agencies-investigating-labor-trafficking-allegations-bartow-county-manufacturer/>; Michael Doudna, *Months After Raid, Some Former Employees Sue Bartow Plant Detailing Alleged Trafficking Operation*, WSB-TV, July 3, 2025, <https://www.wsbtv.com/news/local/bartow-county/months-after-raid-some-former-employees-sue-bartow-plant-detailing-alleged-trafficking-operation/JQJLOK43IJDEBAUZW4E7K5CVPUI>.
 - 31 See Complaint at 33, *Liu*, No. 4:25-cv-00134 (N.D. Ga. May 27, 2025).
 - 32 See *Liu*, No. 4:25-cv-00134 (N.D. Ga. filed May 27, 2025).
 - 33 See Complaint at 1, *Liu*, No. 4:25-cv-00134 (N.D. Ga. May 27, 2025).
 - 34 See *id.* at 1-2, 25.
 - 35 See *id.* at 2, 30.
 - 36 See *id.* at 2.

- 37 See *supra* note 30.
- 38 See *supra* note 32.
- 39 See Brief for Defendants’ Motion to Stay Proceedings, *Liu*, No. 4:25-cv-00134 (N.D. Ga. Aug. 26, 2025). It is not clear from the public filings or public sources whether the defendants have been indicted on the criminal charges.
- 40 See Order at 2-4, *Liu*, No. 4:25-cv-00134 (N.D. Ga. Feb. 4, 2026).
- 41 See Appendices: Total Damages in Federal Civil Trafficking Cases (2003-2025) for a breakdown of damages awarded per year in federal civil trafficking cases.
- 42 On rare occasions, plaintiffs may file a notice that a judgment has been satisfied. In other cases, non-disclosed payments can come from third parties. This is often the case in default judgments against diplomats. It is possible to force diplomats’ governments to pay *ex gratia* settlements to resolve cases that end in default judgment.
- 43 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.
- 44 Section 230 provides immunity to online platforms from civil liability based on third-party content and for the removal of content in certain circumstances. See 47 U.S.C. § 230.
- 45 See *infra* note 88 and accompanying text for more on venture liability.
- 46 In one additional case alleging both forced labor and sex trafficking, the settlement agreement was public, but the terms only provided for non-monetary relief. See Order and Exhibit A, *Cal. Coalition for Women Prisoners v. U.S. Fed. Bureau of Prisons*, No. 4:23-cv-04155 (N.D. Cal. Feb. 27, 2025).
- 47 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.
- 48 Seven cases were filed by a combination of foreign-born plaintiffs and U.S. citizens—these cases are included in both totals.
- 49 In conducting a detailed review of the data set, 46 changes were made to the plaintiffs’ country of origin as a correction or due to additional information identified on the docket. In 21 cases, the country of origin was changed from United States to Unknown. In seven cases, the country of origin was changed from Unknown to United States. In one case, Belarus was added as a country of origin; similarly, in another case, United States was added as a country of origin. In one case, United States was removed as a country of origin; similarly, in another case, Unknown was removed as a country of origin. Finally, the following changes were made to one case each: Taiwan to China, and Poland to Unknown.
- 50 One case filed prior to January 1, 2025, by a plaintiff from Italy, that was not included in the 2024 Data Update, has now been added.
- 51 The plaintiffs’ 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 plaintiffs’ country of origin was categorized as unknown in cases where no nationality could be found in the case’s public filings.
- 52 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.
- 53 This includes all cases where the plaintiffs’ country of origin could be determined from publicly available information as being outside the United States. In 511 cases, there was no publicly available information with respect to whether any plaintiffs’ country of origin was outside the United States.
- 54 This number does not include cases where the immigration or visa status of the plaintiff was unknown.
- 55 See *supra* note 48.
- 56 In 62 cases filed by foreign-born plaintiffs, there was not any publicly available information with respect to the plaintiffs’ immigration and visa status, and, therefore, these cases were categorized as “Unknown” and not included in the total. In 50 cases, the plaintiff(s) did not enter the United States because the alleged trafficking occurred abroad, and, therefore, these cases were also not included in the total. Finally, 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.
- 57 See 2024 Data Update at 14-15.
- 58 These cases are discussed in further detail *infra* Section V.A.
- 59 See *Al.C. v. Jacobs Sols., Inc.*, No. 1:25-cv-00274 (D. Colo.); *Al.B. v. Jacobs Sols., Inc.*, No. 1:25-cv-03067 (D. Colo.); *A.A. v. Omnicom Grp., Inc.*, No. 1:25-cv-03389 (S.D.N.Y.).
- 60 See *Doe v. Barnett*, No. 2:25-cv-06059 (C.D. Cal.).
- 61 See *Doe v. Omega Compliance Sols., LLC*, No. 3:25-cv-03613 (S.D. Cal.).
- 62 See *Angga v. Bumble Bee Foods, LLC*, No. 3:25-cv-00583 (S.D. Cal.) (alleging forced labor in the tuna fishing industry); *Doe 1 v. Starbucks Corp.*, No. 1:25-cv-01261 (D.D.C.) (alleging forced labor on coffee plantations).

- 63 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 plaintiff's claims. Of the 61 cases that invoked Section 1596, 57 included allegations of trafficking crimes that occurred outside of the United States.
- 64 See Amended Complaint at 3, *Angga v. Bumble Bee Foods, LLC*, No. 3:25-cv-00583 (S.D. Cal. Dec. 3, 2025).
- 65 See *id.* at 3-4.
- 66 See Order at 1, *Angga*, No. 3:25-cv-00583 (S.D. Cal. Nov. 12, 2025).
- 67 See *id.* at 7, *Angga*, No. 3:25-cv-00583 (S.D. Cal. Nov. 12, 2025) (citation modified).
- 68 See generally *Al.C. v. Jacobs Sols., Inc.*, No. 1:25-cv-00274 (D. Colo.); *Al.B. v. Jacobs Sols., Inc.*, No. 1:25-cv-03067 (D. Colo.); *A.A. v. Omnicom Grp., Inc.*, No. 1:25-cv-03389 (S.D.N.Y.). At the time of publication, two of these cases had partially survived the defendants' motions to dismiss. See Opinion and Order, *A.A.*, No. 1:25-cv-03389 (S.D.N.Y. Feb. 24, 2026); Order, *Al.C.*, No. 1:25-cv-00274 (D. Colo. Mar. 30, 2026).
- 69 See *F.C. v. Jacobs Sols. Inc.*, 790 F.Supp.3d 1158 (D. Colo. 2025).
- 70 See Amended Complaint at 6-9, *F.C. v. Jacobs Sols. Inc.*, No. 1:23-cv-02660 (D. Colo. Mar. 18, 2024).
- 71 See *F.C.*, 790 F.Supp.3d at 1180-83.
- 72 See *id.* at 1183.
- 73 See *id.* at 1183-84.
- 74 See *id.* at 1184-85.
- 75 See *id.*
- 76 See Order at 2, *F.C. v. Jacobs Sols. Inc.*, No. 1:23-cv-02660 (D. Colo. Mar. 20, 2026).
- 77 See Opinion and Order at 1, 5-6, *Acree v. Alexander*, No. 1:25-cv-02241 (S.D.N.Y. May 28, 2025).
- 78 See Order at 3-4, *Lim-Tom v. United States*, No. 1:25-cv-02241 (N.D. Fla. Dec. 1, 2025).
- 79 Fed. R. Civ. P. 23(b)(3).
- 80 While all 123 cases involve claims under TVPRA, in some instances the plaintiffs only sought class certification on non-TVPRA claims.
- 81 The number of cases where the TVPRA class claim was denied is not a subset of the 14 overall denials. Because some cases involved mixed claims decided in opposite rulings, the two groups overlap but are not identical.
- 82 See Amended Complaint at 1-8, *Yeend v. Akima Glob. Servs., LLC*, No. 1:20-cv-01281 (N.D.N.Y. Sep. 8, 2022).
- 83 See *Yeend v. Akima Glob. Servs., LLC*, No. 1:20-cv-01281, 2025 WL 959968 at *11-19 (N.D.N.Y. Mar. 31, 2025).
- 84 See *Akima Glob. Servs., LLC v. Yeend*, No. 25-901 (2d Cir.), *perm. app. granted sub nom., Yeend v. Akima Glob. Servs., LLC*, No. 25-2209 (2d Cir.). At the time of publication, this case was still pending before the Second Circuit.
- 85 See Exhibit A, Brief for *Amicus Curiae* Human Trafficking Legal Center in Support of Plaintiffs-Appellees, at 16-17, *Yeend*, No. 25-2209 (2d Cir. Mar. 30, 2026).
- 86 See *United States v. Rivera*, 799 F.3d 180, 186-187 (2d Cir. 2015).
- 87 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.
- 88 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]” (as amended). This provision, dubbed “venture liability,” expanded liability beyond direct perpetrators to include those who knowingly benefit from participating in a venture engaged in forced labor or sex trafficking.
- 89 For more detail on types of defendants in sex trafficking cases, see *infra* Section V.A.
- 90 According to the Migration Policy Institute, nearly 86 percent of immigrant detainees were held in privately run facilities in early 2025. See Muzaffar Chishti and Valerie Lacarte, *U.S. Immigrant Detention Grows to Record Heights under Trump Administration*, MIGRATION INFO. SOURCE (Migration Pol'y Inst.), Oct. 29, 2025, <https://www.migrationpolicy.org/article/trump-immigrant-detention>.
- 91 In 2025, plaintiffs filed 30 civil TVPRA cases in the detention context against the operators of prisons, jails, and corrections programs, but none against the operators of for-profit detention facilities.
- 92 Courts administratively stayed three cases pending the resolution of related cases and appeals, highlighting the potential impact of a resolution in this category of cases.
- 93 The decision was issued in February 2026, prior to the publication of this report. See *GEO Grp., Inc. v. Menocal*, 146 S. Ct. 774 (2026). The Supreme Court ruled against GEO, allowing the case to proceed to trial.
- 94 The decision was issued in June 2026, prior to the publication of this report. See *Ruderman v. Kenosha Cnty.*, No. 24-2939, 2026 WL 1623031 (7th Cir. June 5, 2026). The U.S. Court of Appeals for the Seventh Circuit vacated

- and remanded, holding narrowly that the TVPRA's forced labor provision, 18 U.S.C. § 1589, reaches county jails as juridical 'persons' and, at minimum, bars threatening civil detainees with solitary confinement to coerce unpaid work. *See id.* at *2-3.
- 95 The case is currently on appeal before the U.S. Court of Appeals for the Second Circuit. *See supra* note 84 and accompanying text.
- 96 At least two other courts have granted class certification to civil immigration detainees alleging forced labor abuses. *See Menocal v. GEO Grp., Inc.*, 320 F.R.D. 258, 270-71 (D. Colo. 2017), *aff'd*, 882 F.3d 905, 926 (10th Cir. 2018), *cert. denied sub nom., GEO Grp., Inc. v. Menocal*, 139 S. Ct. 143, 144 (2018); *Owino v. CoreCivic, Inc.*, No. 3:17-cv-01112, 2020 WL 1550218, at *26-28 (S.D. Cal. Apr. 1, 2020), *aff'd*, 60 F.4th 437, 446-47 (9th Cir. 2022), *cert. denied sub nom., CoreCivic, Inc. v. Owino*, 143 S. Ct. 2612 (2023).
- 97 *See* Appendices: Forced Labor Cases by Sector (2003-2025) for the underlying data in tabular form.
- 98 *See* Appendices: Forced Labor Cases by Sector (2025) for the underlying data in tabular form.
- 99 *See Sherman v. Trinity Teen Sols. Inc.*, No. 2:20-cv-00215 (D. Wyo.).
- 100 *See* Order at 28-29, *Sherman*, No. 2:20-cv-00215 (D. Wyo. Sep. 23, 2025).
- 101 *See id.* at 2-3.
- 102 *See* First Amended Complaint at 24-26, *Sherman*, No. 2:20-cv-00215 (D. Wyo. Feb. 12, 2021).
- 103 *See Sherman*, No. 2:20-cv-00215, 2022 WL 17573837 at *1 (D. Wyo. Oct. 5, 2022), *vacated*, 84 F.4th 1182 (10th Cir. 2023).
- 104 *See* Order at 1, *Sherman*, No. 2:20-cv-00215 (D. Wyo. Apr. 22, 2024); Order at 28-29, *Sherman*, No. 2:20-cv-00215 (D. Wyo. Sep. 23, 2025).
- 105 *See* Order at 3, *Sherman*, No. 2:20-cv-00215 (D. Wyo. Sep. 23, 2025); *see also* Stipulation of Class Action Settlement at 8, *Sherman*, No. 2:20-cv-00215 (D. Wyo. May 28, 2025).
- 106 *See* Judgment, *Gomez-Echeverria v. Purpose Point Harvesting, LLC*, No. 1:22-cv-00314 (W.D. Mich. June 12, 2025).
- 107 *See* Second Amended Complaint at 3-15, *Gomez-Echeverria*, No. 1:22-cv-00314 (W.D. Mich. June 20, 2023).
- 108 *See id.* at 12-15.
- 109 *See Gomez-Echeverria*, No. 1:22-cv-00314, 2025 WL 3471465 (W.D. Mich. Nov. 10, 2025) (denying defendants' motion for new trial); *Gomez-Echeverria*, No. 25-2080 (6th Cir. filed Nov. 25, 2025). The U.S. Court of Appeals for the Sixth Circuit held oral argument on June 3, 2026.
- 110 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" and not included in this chart.
- 111 *See supra* note 43 for the definition of favorable and unfavorable outcome.
- 112 *See* Amended Complaint at 20, *Maslic v. Ism Vuzem d.o.o.*, No. 5:21-cv-02556 (N.D. Cal. Mar. 18, 2022).
- 113 *See id.* at 21-23.
- 114 *See id.*
- 115 *See id.*
- 116 *See id.* at 26-29. The remaining claims, including the class claims, were not based on the TVPRA.
- 117 *See* Default Judgment at 1-2, *Maslic*, No. 5:21-cv-02556 (N.D. Cal. July 31, 2025) (amended Nov. 12, 2025).
- 118 *See* Order at 20-22, *Maslic*, No. 5:21-cv-02556 (N.D. Cal. July 31, 2025).
- 119 One publicly disclosed settlement only provided non-monetary relief. *See supra* note 46.
- 120 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, Secure Live Media (owner of Camsoda), and Roblox.
- 121 Plaintiffs filed four civil trafficking cases against Roblox in 2025, which were transferred to the U.S. District for the Northern District of California as part of a multidistrict litigation. *See In Re: Roblox Corp. Child Sexual Exploitation and Assault Litig.*, MDL No. 3166 (N.D. Cal.). At the time of publication, it was unclear whether the multidistrict litigation would address any TVPRA claims.
- 122 *See, e.g., Barbu v. Harvest Christian Fellowship*, No. 5:25-cv-02428 (C.D. Cal.).
- 123 *See, e.g., Complaint* at 2, *Barbu*, No. 5:25-cv-02428 (C.D. Cal. Sep. 16, 2025).
- 124 *See, e.g., id.* at 26.
- 125 *See, e.g., id.* at 4-6.
- 126 *See, e.g., id.* at 75.
- 127 *See* 2024 Data Update at 19.
- 128 The only new outcome in all civil TVPRA cases against religious institutions and organizations in 2025 was a voluntary dismissal without prejudice. *See id.* for outcomes in these cases as of 2024.
- 129 To the best of our knowledge, only one plaintiff identifying as a transgender woman had filed a civil sex trafficking case as of December 31, 2025.
- 130 Of those 25 cases, 15 were brought by Romanian men that were sexually abused as minors in a network of orphanages and foster homes in Romania. *See supra* Section V.A.

- 131 Eight sex trafficking cases were not included in this chart—six cases resulted in a successful class action or class action settlement, so plaintiff's gender was categorized as "Class"; one case was brought by a government plaintiff; and in one case, the gender of the plaintiffs could not be determined from the public filings.
- 132 See *supra* note 43 for the definition of favorable and unfavorable outcome.
- 133 See *supra* note 46.
- 134 The first outcome in a civil sex trafficking case filed under the TVPRA occurred in 2011.
- 135 See *S.M.A. v. Salesforce.com, Inc.*, No. 3:23-cv-00915 (N.D. Tex.); *Doe (A.S.) v. Salesforce.com, Inc.*, No. 3:23-cv-01039 (N.D. Tex.); *A.B. v. Salesforce.com, Inc.*, No. 4:20-cv-01254 (S.D. Tex.).
- 136 See, e.g., *Thompson v. Backpage.com, LLC*, No. 1:20-cv-06734 (S.D.N.Y.) (stayed due to federal and state criminal cases against Carl Ferrer, Backpage.com, and Michael Lacey); see also *U.S. v. Ferrer*, No. 2:18-cr-00464 (D. Ariz.); *U.S. v. Backpage.com*, No. 2:18-cr-00465 (D. Ariz.); *U.S. v. Lacey*, No. 2:18-cr-00422 (D. Ariz.); *People v. Ferrer*, No. 16FE024013 (Sup. Ct. Cal.); *State v. Ferrer*, No. 18FC-1652C (94th Dist. Ct. Tex.); *State v. Backpage.com*, No. 18FC-1653C (94th Dist. Ct. Tex.).
- 137 The mediations in sex trafficking cases against the hotel industry are discussed in further detail *supra* Section III.C.1.
- 138 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.
- 139 See Consent Judgment, *J.C. v. Yash Luv, LLC*, No. 1:22-cv-00846 (N.D. Ga. Feb. 24, 2023).
- 140 See *infra* notes 142-45 and accompanying text.
- 141 It should be noted that \$365,000,000 of the total is a result of two settlements in 2023 connected with Jeffrey Epstein's sex trafficking venture. See *Doe v. JPMorgan Chase Bank*, No. 1:22-cv-10019 (S.D.N.Y.) (settled for \$290,000,000); *Doe v. Deutsche Bank Aktiengesellschaft*, No. 1:22-cv-10018 (S.D.N.Y.) (settled for \$75,000,000).
- 142 See Judgment on Jury Verdict, *J.G. v. Northbrook Indus., Inc.*, No. 1:20-cv-05233 (N.D. Ga. July 31, 2025).
- 143 See Complaint at 2, *J.G.*, No. 1:20-cv-05233 (N.D. Ga. Dec. 28, 2020).
- 144 See *id.* at 10-16.
- 145 See *supra* note 142. At the time of publication, the defendant had filed a motion challenging the verdict, which was pending before the court. See Renewed Motion for Judgment as a Matter of Law, *J.G.*, No. 1:20-cv-05233 (N.D. Ga. Aug. 27, 2025).
- 146 This article refers to a "next trial" in another sex trafficking case filed under the TVPRA against a hotel, *D.H. v. Tucker Inn Inc.*, No. 1:22-cv-03419 (N.D. Ga.). Rather than go to trial, the hotel defendant reached a confidential settlement with the plaintiff in 2025. See Stipulation of Dismissal, *D.H. v. Tucker Inn Inc.*, No. 1:22-cv-03419 (N.D. Ga. Aug. 20, 2025). The settlement amount was not reported on the public docket, but press reports indicated that the parties settled for \$6 million. See Eric Mock, *Tucker Motel Settles \$6M in Child Sex Trafficking Case*, FOX 5 ATLANTA (July 18, 2025), <https://www.fox5atlanta.com/news/tucker-motel-settles-6m-child-sex-trafficking-case>. This settlement amount does not appear in the docket and could not be corroborated. The settlement is therefore not included in this report's damages/settlements data set.
- 147 See Richard Sine, *Hotels Face a Reckoning on Sex Trafficking*, BUS. INS., Apr. 28, 2026, <https://www.businessinsurance.com/hotels-face-a-reckoning-on-sex-trafficking/>.
- 148 One case involving sex trafficking was excluded from the data set because it was filed as a duplicate case. See *supra* Section VII.
- 149 Two cases involving sex trafficking were excluded from the data set. One was removed because the complaint was amended to remove the TVPRA claim prior to any defendants appearing in the case, and the other was erroneously included. See *supra* Section VII.
- 150 The total damages awards include attorneys' fees and costs. See *supra* note 47.

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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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