



Recent Labor Trafficking Cases and Trends

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About This Report

This resource was developed as part of the Partnerships to Address Labor Trafficking project, designed to improve the awareness, responsiveness, and accountability among law enforcement, businesses, communities, the courts, and other stakeholders on labor trafficking.

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This report was created to explore the complexity of labor trafficking cases from the time they are first investigated until they are adjudicated. A commonality across all the cases presented here is that the victims all come from marginalized groups, which in itself makes these cases more complex. Many cases include a language barrier or a citizenship issue. Tribal cases also include a separate set of judicial rules and processes. These complexities can make it challenging to recognize that labor trafficking has occurred and can make the investigation process lengthy. But through the continued investigation and discussion of labor trafficking, communities and law enforcement can improve their knowledge of, and responsiveness to, labor trafficking cases.

This project is a collaborative effort between the Office of Community Oriented Policing Services (COPS Office) and the Institute for Intergovernmental Research. This report was compiled by subject matter experts Terry Coonan, Professor of Law and Criminology at Florida State University, and Lou deBaca, former ambassador and prosecutor, current Professor of Law at the University of Michigan.

For more information and additional resources, visit cops.usdoj.gov/labor_trafficking.

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Notable General Cases and Trends

Among the most notable labor trafficking trends in recent years is **forced labor perpetrated by religious organizations**—or perhaps more accurately, organizations claiming to have a religious mission. In cases across the United States, both vulnerable foreign nationals and U.S. citizens were victimized in labor trafficking schemes involving religious organizations.

In September 2019, the U.S. Department of Justice indicted a dozen leaders of the **Imperial Valley Ministries (IVM)** in Brownsville, Texas; El Centro, California; and San Diego, California, charging them with conspiracy, forced labor, domestic servitude, and benefits fraud.¹ The church leaders allegedly subjected dozens of mostly homeless people to long hours of panhandling and locked them in group homes, where they supposedly received shelter and drug rehabilitation services. Food and medicine were regularly withheld from the victims for supposed rule violations. The church leaders also allegedly confiscated the victims' identity documents and forced them to surrender Electronic Benefits Transfer (EBT) cards. IVM ministers also allegedly threatened the victims with taking their children away if they attempted to escape.

In April 2021, **Tracie Dickey, a self-appointed bishop of Deliverance Tabernacle Ministries**, was sentenced to 12 years' imprisonment for a forced labor scheme that victimized church members in

Florida, North Carolina, and Pennsylvania.² Dickey forced church members to work multiple jobs, including as desk clerks at hotels, and confiscated all their earnings. She also engineered a fraud scheme in which a scam travel agency she operated collected almost half a million dollars for hotel reservations it never booked. Dickey was shown to have coerced the members of her ministry by starving and humiliating them, forcing some into homelessness, and threatening that God would harm their families if they disobeyed her rules.

In May 2021, federal law enforcement agents raided the construction site of a massive temple being built in Robbinsville, New Jersey, by a **Hindu sect known as the Bochasanwasi Akshar Purushottam Swaminarayan Sanstha (BAPS)**.³ The workers at the site—most of whom were Dalit, from the lowest sector of India's caste system—alleged that they were victims of forced labor, being paid \$1 per hour for 13 hours a day of grueling labor. The BAPS sect had secured R1 visas (temporary visas issued to clergy and lay religious workers) for the laborers and presented workers to U.S. immigration officials as volunteers upon their entry into the United States. Upon their arrival, the laborers allegedly were required to sign labor contracts, often in English, and instructed to tell U.S. officials that they were skilled carvers or decorative painters. The workers allege that they then

1 U.S. Attorney's Office, Southern District of California, "Church Leaders Indicted in Forced Labor Conspiracy," press release, September 10, 2019, <https://www.justice.gov/usao-sdca/pr/church-leaders-indicted-forced-labor-conspiracy>.

2 U.S. Attorney's Office, Northern District of Illinois, "Woman Sentenced to 12 Years in Prison for Coercing Members of Church Ministry Into Forced Labor," press release, April 6, 2021, <https://www.justice.gov/usao-ndil/pr/woman-sentenced-12-years-federal-prison-coercing-members-church-ministry-forced-labor>.

3 Annie Correal, "Hindu Sect Accused of Using Forced Labor at More Temples Across U.S.," *New York Times*, November 10, 2021, <https://www.nytimes.com/2021/11/10/nyregion/baps-hindu-forced-labor.html>.

were confined to the temple grounds, had their passports confiscated, were forbidden to talk with visitors, and were fed a meager diet of lentils and potatoes. The case is being investigated for both potential labor trafficking and immigration fraud.

In recent years, more forced labor lawsuits have been filed against the **Church of Scientology**. The suits have been filed by ex-Scientology members, alleging not only forced labor but also retaliation, child abuse, libel, slander, invasion of privacy, and intentional infliction of emotional distress. A number of the cases involve the church's Sea Organization (Sea Org)—a clergy-like workforce in which members sign billion-year contracts and work up to 100 hours a week for little to no wages. One of the lawsuits describes the Sea Org structure as a human trafficking scheme that financially benefits the larger Church of Scientology. While the Ninth Circuit *Headley* labor trafficking lawsuit⁴ was resolved in favor of the church in 2012, attorneys for the plaintiffs in the latest lawsuits insist that religious liberty defenses do not apply in these new cases.

Another recent significant case involved **labor trafficking in West Palm Beach strip clubs**. In February 2019, Cuban national Ivan Madrigal Zamora was sentenced to 121 months in federal prison⁵ for smuggling

three women from Cuba into the United States, transporting them to West Palm Beach, and then forcing them to work in strip clubs to pay off supposed smuggling debts of \$26,000. Zamora arranged for all three of the victims to be smuggled to the United States through Mexico and then beat the women and verbally threatened them and their families to coerce their labor in the strip clubs. Zamora was convicted of both forced labor and smuggling violations.

Finally, **domestic servitude cases** continue to be perpetrated and prosecuted nationwide. One major case involved two Indian professionals—**Satish Kartan**, a wealthy businessman, and his wife, **Sharmistha Barai**, a successful child psychiatrist—who enslaved young women from India in their Stockton, California, home.⁶ For more than two years, the couple used internet ads to lure young women from India with promises of reasonable hours and attractive pay to serve as nannies and housekeepers in their home in an upscale neighborhood. The reality that awaited the young women was quite different: 18-hour workdays and beatings and burnings when they failed to meet their employers' demands. In October 2020, both defendants were given 15-year federal sentences for forced labor and conspiracy. These are among the longest forced labor sentences handed down by U.S. courts.

4 FindLaw. (July 24, 2012). *Headley v. Church of Scientology*. Retrieved January 4, 2022, from <https://caselaw.findlaw.com/us-9th-circuit/1606921.html>.

5 U.S. Attorney's Office, Southern District of Florida, "Cuban National Sentenced to More Than 10 Years for Labor Trafficking and Alien Smuggling," press release, February 21, 2019, <https://www.justice.gov/usao-sdfl/pr/cuban-national-sentenced-more-10-years-labor-trafficking-and-alien-smuggling>.

6 U.S. Attorney's Office, Eastern District of California, "Former Stockton Couple Convicted of Human Trafficking Charges Related to Forced Labor of Foreign Nationals," press release, March 18, 2019, <https://www.justice.gov/usao-edca/pr/former-stockton-couple-convicted-human-trafficking-charges-related-forced-labor-foreign>.

Notable Child Labor Cases and Trends

One of the most significant national trends in child labor trafficking involves what has been termed the “**troubled teen industry**”—the growing business of “tough love” residential programs for minors with behavioral issues or marginalized sexual identities. Such programs often feature a faith-based approach to their missions, and many operate in rural counties in the United States where public oversight is limited. A number of these programs have been accused of labor trafficking as well as disciplinary abuses ranging from starvation of children to punitive solitary confinement.

In 2018, a Texas couple—**Gary and Meghann Wiggins**—who ran one such program were indicted on labor trafficking charges resulting from the religious boarding school they operated in Burnet County, north of Austin. Following allegations of neglect, abuse, and labor trafficking, Texas officials in 2018 executed a search warrant on the Wigginses’ **Joshua Home Boarding School**⁷ and discovered that the eight children in the home were being forced to work without compensation in the couple’s lawn care and moving companies that operated in the nonprofit’s name. The ensuing investigation revealed that the couple previously had run similar programs in Alabama and Missouri, shutting down their houses there when state officials launched investigations of reported abuses. One former teen resident who

identified as gay reported suffering repeated beatings at the hands of the Wigginses meant to “make him straight.”

In 2021, a class action lawsuit was filed against the Wyoming-based **Trinity Teen Solutions**,⁸ a corporation that operated group homes in several states for troubled teenagers, promising parents that the minors would receive full-time, cutting-edge therapies and would complete their high school studies. The plaintiffs alleged that the minors were instead forced to work without pay for periods that ranged from months to years. Refusal to work led to threats that the children would suffer physical or emotional abuse and prolonged confinement. Also named in the lawsuit were defendants **Triangle Cross Ranch** and **The Monks of the Most Blessed Virgin Mary of Mount Carmel**. Once again, there appears to be a pattern of child labor trafficking by organizations purporting to rehabilitate troubled teens.

A second trend in the area of child labor trafficking noted nationwide is that of **exploitative child sales crews**. The emerging pattern is often one that involves perpetrators promoting a faith-based or empowerment model of youth employment. Many of the victims exploited in these schemes are inner-city children whose parents are eager for them to learn responsibility and find gainful employment. Typically,

7 Kate Winkle and Tom Miller, “Owners of Joshua Home Arrested, Charged With Trafficking Boys in Burnet Co,” *KXAN*, August 19, 2019, <https://www.kxan.com/investigations/owners-of-joshua-home-arrested-charged-with-trafficking-boys-in-their-care/>.

8 Kamila Kudelska, “Twenty-Five Girls Claim Abuse While at Clark Private Christian Residential Treatment Center.” *Wyoming Public Media*, December 4, 2020, <https://www.wyomingpublicmedia.org/open-spaces/2020-12-04/twenty-five-girls-claim-abuse-while-at-clark-private-christian-residential-treatment-center>.

the children are driven out of their own neighborhoods by their traffickers and taken to another city or county, where they are ordered to sell candy or magazines or simply to panhandle.

In 2019, **Shawn Floyd** was arrested after a traffic stop in Bowling Green, Kentucky,⁹ and accused of bringing 12 children from out of state into Kentucky to sell candy for him. After Floyd was initially charged with

misdemeanor counts of endangering minors, a grand jury subsequently indicted him on 12 felony charges of **child labor trafficking**. He allegedly forced the children to work for as little as \$2 an hour, further requiring them to pay for their own meals and water. The Kentucky Labor Cabinet has also filed a lawsuit against him for failure to pay \$45,000 that regulators levied against him.

⁹ Justin Story, “Attorney: Trial Likely for Man Accused of Human Trafficking,” *Bowling Green Daily News*, September 22, 2020, https://www.bgdailynews.com/news/attorney-trial-likely-for-man-accused-of-human-trafficking/article_b9b195d8-0cb6-508c-a86e-b6241e2e2982.html.

Notable Tribal-Specific Cases and Trends

A new mode of labor trafficking has emerged on tribal lands in the United States as a result of the burgeoning **hemp/marijuana industry**. The dark underside of this industry became evident in the Navajo Nation in 2019, when advocates and federal and tribal law enforcement officials intervened in what appeared to be illicit marijuana cultivation on Navajo tribal lands near Shiprock, New Mexico. Chinese entrepreneurs had invested heavily in grow sites in the Navajo Nation that had traditionally been utilized for growing the white corn that is central to the Navajo diet and religious ceremonies. The Chinese entrepreneurs officially claimed that their farming sites were dedicated to the production of hemp that could be sold in the legal cannabidiol (CBD) market nationwide. Suspecting that many of the Chinese-owned farms were harvesting not hemp but high-grade illegal marijuana for black market consumption, federal authorities launched **“Operation Navajo Gold”** in 2019.¹⁰ The initial raid netted more than 60,000 pounds of illegal marijuana from the Chinese-owned and -operated farms.

As Operation Navajo Gold has continued, it has revealed a second form of organized crime as well: the **large-scale labor exploitation of Chinese**

immigrants¹¹ recruited from southern California and transported to the relatively remote farms on the Navajo tribal lands. Chinese labor bosses had brought in as many as 1,000 Chinese laborers, many of whom had lost restaurant jobs in southern California as a result of the pandemic and were desperate to pay off smuggling loans owed to Chinese “snakeheads,” a term used in China for human-smuggling gangs. The federal drug raid revealed the presence of scores of these laborers, many of whom had been recruited through WeChat, the social media and messaging platform popular among the Chinese community. Federal and tribal law enforcement officials found emaciated, disoriented Chinese immigrants sleeping on the floors of greenhouses or in the fields who had not been paid and were close to starving. Victim interviews revealed that most had come from the San Gabriel Valley in the Los Angeles, California, area, home to one of the largest Chinese immigrant communities in the United States. They had been recruited from communities in and near the neighborhood of El Monte, California—the site of the 1995 sweatshop raid that had first revealed the scope of labor trafficking in modern America.

10 Arlyssa Becenti, “Coalition of Officers Raids Benally’s Hemp Farms,” *Navajo Times*, November 12, 2020, <https://navajotimes.com/reznews/coalition-of-officers-raids-benallys-hemp-farms/>.

11 Legu Zhang, “Chinese Workers Turn to US Marijuana Industry as Service Jobs Dry Up,” *Voice of America*, January 23, 2021, https://www.voanews.com/a/usa_chinese-workers-turn-us-marijuana-industry-service-jobs-dry/6201064.html.

About IIR

The **Institute for Intergovernmental Research (IIR)** is a Florida-based, not-for-profit corporation specializing in research, training, and technical assistance for criminal justice, homeland security, and juvenile justice issues. IIR has a proven history of successful service delivery of federal programs to state, local, and tribal law enforcement agencies and homeland security partners.

With emphasis on intergovernmental collaboration, IIR offers expertise and an extraordinary track record in management and organization, operations, information systems, planning, research, technical assistance, program evaluation, curriculum development, training, and policy development and implementation. IIR has long-standing, trusted relationships with federal, state, local, and tribal law enforcement agencies as well as partnerships with national organizations dedicated to advancing the field of criminal justice.

In addition to IIR's experienced and resourceful staff of more than 140 employees, IIR partners with a cadre of more than 150 highly experienced criminal justice professionals, law enforcement practitioners, and academic researchers—many of whom are nationally and internationally recognized—in the delivery of federal programs.

IIR is one of the technical assistance providers for the U.S. Department of Justice, Office of Community Oriented Policing Services Critical Response Initiative and Collaborative Reform Initiative for Technical Assistance.

To learn more, visit IIR online at www.iir.com.

About the COPS Office

The **Office of Community Oriented Policing Services (COPS Office)** is the component of the U.S. Department of Justice responsible for advancing the practice of community policing by the nation's state, local, territorial, and tribal law enforcement agencies through information and grant resources.

Community policing begins with a commitment to building trust and mutual respect between police and communities. It supports public safety by encouraging all stakeholders to work together to address our nation's crime challenges. When police and communities collaborate, they more effectively address underlying issues, change negative behavioral patterns, and allocate resources.


Rather than simply responding to crime, community policing focuses on preventing it through strategic problem-solving approaches based on collaboration. The COPS Office awards grants to hire community policing officers and support the development and testing of innovative policing strategies. COPS Office funding also provides training and technical assistance to community members and local government leaders, as well as all levels of law enforcement.

Since 1994, the COPS Office has been appropriated more than \$20 billion to add community policing officers to the nation's streets, enhance crime fighting technology, support crime prevention initiatives, and provide training and technical assistance to help advance community policing. Other achievements include the following:

- To date, the COPS Office has funded the hiring of approximately 136,000 additional officers by more than 13,000 of the nation's 18,000 law enforcement agencies in both small and large jurisdictions.
- Nearly 800,000 law enforcement personnel, community members, and government leaders have been trained through COPS Office-funded training organizations and the COPS Training Portal.
- More than 800 agencies have received customized advice and peer-led technical assistance through the COPS Office Collaborative Reform Initiative Technical Assistance Center.
- To date, the COPS Office has distributed more than eight million topic-specific publications, training curricula, white papers, and resource CDs and flash drives.

The COPS Office also sponsors conferences, roundtables, and other forums focused on issues critical to law enforcement.

COPS Office information resources, covering a wide range of community policing topics such as school and campus safety, violent crime, and officer safety and wellness, can be downloaded via the COPS Office's home page, <https://cops.usdoj.gov>.



This report, *Recent Labor Trafficking Cases and Trends*, was developed as part of the Partnerships to Address Labor Trafficking project, designed to improve the awareness, responsiveness, and accountability among law enforcement, businesses, communities, the courts, and other stakeholders on labor trafficking. It describes recent notable trends in human trafficking through examining a range of example cases in areas including forced labor perpetrated by religious organizations, child labor in the traveling sales crews industry, and labor trafficking on tribal lands.



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