

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA**

JANE DOE, an individual,

Plaintiff,

v.

RED ROOF INNS, INC.;  
RED ROOF FRANCHISING, LLC.;  
ASIP MANAGEMENT INC.;  
SHIV SAI KRUPA LLC;  
SAVITA OF FAYETTEVILLE, INC.;  
LAXMI, HOTELS OF FAY;  
KOKILABEN R. PATEL AND SURESH  
BABU; and  
LILI OF FAYETTEVILLE INC.

Defendants.

Case No.

**COMPLAINT**

Plaintiff Jane Doe (“Plaintiff” or “Doe”), by and through the undersigned counsel, respectfully submits her complaint for damages and makes the following averments:

**INTRODUCTION**

1. Red Roof Inns, Inc. (hereinafter “RRI”), Red Roof Franchising, LLC. (hereinafter “RRF”) (collectively, RRI and RRF may be referred to as the “Hotel Brand Defendants”), ASIP Management Inc., Shiv Sai Krupa LLC, Savita of Fayetteville, Inc., Laxmi, Hotels of Fay, Kokilaben R. Patel and Suresh Babu, and Lili of Fayetteville Inc. (collectively, Defendants may be referred to as the “Hotel Defendants”) know and have known for more than a decade that sex trafficking repeatedly occurs under their flag throughout the country. Rather than taking timely and effective measures to thwart this epidemic, the Defendants have instead chosen to ignore the

open and obvious presence of sex trafficking on their properties, enjoying the profit from rooms rented for this explicit and apparent purpose.

2. Jane Doe, a survivor of sex trafficking, is identified by the pseudonym Jane Doe and at all times relevant to this lawsuit, was a resident of the State of North Carolina.

3. In 2019, Doe met two persons who groomed her into commercial sexual exploitation. Those persons used common methods associated with human sex trafficking such as the use of force, fraud, and coercion to manipulate Doe, controlling every aspect of her life and how Doe became a victim of a “severe form” of human trafficking as it is defined under 22 U.S.C §7102 (11).

4. Doe’s life is replete with sexual imprisonment and unimaginable abuse during which time she was forced to endure violence, trauma, brutal beatings, exploitation, manipulation, threats, isolation, humiliation, and degradation.

5. This action for damages is brought by the Plaintiff, Jane Doe, under the Federal William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (hereinafter “TVPRA”).

6. Doe, a survivor of sex trafficking, brings this action for damages against Defendants pursuant to the TVPRA, 18 U.S.C. § 1595 and N.C. Gen. Stat. Ann. § 14-43.18, as well as common law claims of negligence. Each Defendant knowingly benefitted from participation in a commercial business venture that they knew or should have known to be engaging in sex trafficking in violation of the TVPRA.

7. Doe was advertised on a website well known for human trafficking against her will, physically tortured, and sexually exploited under duress at hotels in Fayetteville, NC, including the Red Roof Inn® by Red Roof, Coliseum Inn, Cardinal Inn & Suites, Crown Inn,

and Airport Inn Budget Motel.

8. Doe's trafficker forced her onto Defendants' properties where she was repeatedly raped and forced to perform commercial sex acts with "buyers" under threats of death, physical violence, and psychological abuse.

9. Doe has spent a considerable amount of time attempting to regain the life that was stripped away from her as a result of her victimization and exploitation.

10. Doe brings this lawsuit in an attempt to hold the Defendants accountable for facilitating and enabling her trafficking, and receiving profit from it.

11. The Plaintiff brings this action pursuant to the Trafficking Victims Protection Reauthorization Act 18 U.S.C. §1595, against the Defendants who enabled, harbored, held, facilitated, or otherwise financially benefited, or any combination of the foregoing, from a sex trafficking venture in which Doe was sex trafficked, sexually exploited, and victimized in violation of the TVPRA.

### **PARTIES**

12. Plaintiff Doe is a natural person and a resident and citizen of the State of North Carolina. Doe is a "victim" of sex trafficking as protected under applicable provisions of the TVPRA.

- a. Due to the sensitive and intimate nature of the issues, Plaintiff Doe requests that this Court grant a protective order pursuant to Fed. R. Civ. P. 26(c) to permit her to proceed under a pseudonym and to ensure that Defendants maintain the confidentiality of Plaintiff's identity throughout the pendency of this lawsuit and after.<sup>1</sup>

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<sup>1</sup> In cases where the plaintiffs have demonstrated a need for anonymity, the district court should use its powers to manage pretrial proceedings under Fed. R. Civ. P. 16(b), and to issue protective orders limiting disclosure of the

- b. Generally, under the Federal Rules of Civil Procedure, pleadings must state the name of all parties.<sup>2</sup> However, there are exceptions when the issues involved are of a sensitive and highly personal nature.<sup>3</sup> For good cause, the Court may issue an order to protect a party or person from annoyance, embarrassment, oppression or undue burden or expense.<sup>4</sup>
- c. Here, granting pseudonym status and proceeding under seal is warranted because this litigation will involve the disclosure of stigmatizing sexual information, including rape. Plaintiff fears the stigma of being a trafficking survivor by family, friends, employer, and community, if her true identity is revealed in the public record.
- d. Plaintiff should not be compelled to disclose her identity in order to maintain her privacy and safety. Plaintiff's privacy interest substantially outweighs the customary practice of judicial openness.<sup>5</sup>
- e. Moreover, Defendants will not be prejudiced. Plaintiff will agree to reveal her identity to Defendants for the limited purpose of investigating Plaintiff's claims once the parties have entered into a protective order. Plaintiff seeks redaction

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party's name under Fed. R. Civ. P. 26(c), to preserve the party's anonymity to the greatest extent possible without prejudicing the opposing party's ability to litigate the case. *Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058, 1069 (9th Cir. 2000).

<sup>2</sup> Fed. R. Civ. P. 10(a).

<sup>3</sup> A district court must balance the need for anonymity against the general presumption that the parties' identities are public information and the risk of unfairness to the opposing party. *See, e.g., M.M. v. Zavaras*, 139 F.3d 798, 803 (10th Cir.1998); *James v. Jacobson*, 6 F.3d at 238 (4th Cir. 1993); *Doe v. Frank*, 951 F.2d 320, 323–24 (11th Cir.1992); *Doe v. Stegall*, 653 F.2d at 186 (5th Cir.); *see also Doe v. Frank* at 323 (11th Cir. 1992) (holding that a plaintiff should be permitted to proceed anonymously in cases involving matters of a highly sensitive and personal nature, real danger of physical harm, or where the injury litigated against would be incurred as a result of the disclosure of the plaintiff's identity).

<sup>4</sup> Fed. R. Civ. P. 26(c).

<sup>5</sup> *Does I thru XXIII*, 214 F.3d at 1068 (joining its 4th, 5th, 10th, and 11th sister circuits in holding that a party may preserve his or her anonymity in judicial proceedings in special circumstances when the party's need for anonymity outweighs prejudice to the opposing party and the public's interest in knowing the party's identity).

of Plaintiff's personal identifying information from the public docket and assurances that Defendants will not use or publish Plaintiff's identity in a manner that will compromise her safety, personal life, personal relationships, or future employment prospects.

13. Defendant Red Roof Inns, Inc ("RRI") is a publicly traded company. The company provides franchise opportunities for its hotel and motel brands through Defendant Red Roof Franchising, LLC ("RRF").

- a. Defendant RRI is a Delaware corporation, with its corporate headquarters and principal place of business located at 7815 Walton Pkwy, New Albany, Ohio 43054. RRI can be served through its registered agent, Corporation Service Company, at 50 West Broad Street, Suite 1330, Columbus, Ohio 43215.
- b. Defendant RRF is a Delaware limited liability company with its corporate headquarters and principal place of business located at 7815 Walton Pkwy, New Albany, Ohio 43054. RRF can be served through its registered agent, Corporation Service Company, at 50 West Broad Street, Suite 1330, Columbus, Ohio 43215.
- c. RRI purchases, owns, and manages a network of hotels and motels globally, primarily in the Midwest, Southern, and Eastern United States. RRI serves customers throughout the United States and other countries throughout the World.
- d. Defendant RRI is a global hotel brand with approximately 650 branded properties worldwide. Red Roof was named one of the fastest growing franchises in 2017.

14. RRI owns, supervises, manages, controls, and/or operates the Red Roof branded hotels where Plaintiff Doe was sex trafficked, sexually exploited, and victimized by traffickers.

- a. Red Roof Inn® owns, supervises, manages, controls, and/or operates the Red Roof Inn & Suites located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306 (hereinafter “Fayetteville RRI”).
- b. Red Roof Inn® by Red Roof is a Red Roof branded property.
- c. Defendants hired employees to work at the Fayetteville RRI. Defendants’ employees worked jobs including front desk staff and housekeeping.
- d. Red Roof Inn® are the principal and have control over nearly every element of operations at their branded properties, including the Fayetteville RRI. Defendants are directly and indirectly liable for the acts and/or omissions of the employees at their branded properties where Doe was trafficked. Defendants have an actual and apparent agency relationship with the property owners of the Fayetteville RRI as to establish vicarious liability.

15. Hotel Brand Defendants controlled and dictated the actions and inactions of the Fayetteville RRI by Red Roof through variety of means enforced through franchise agreements, brand standards, and related contracts, including but not limited to:

- a. Providing the software, hardware, and platforms where data and information is shared with Red Roof corporate;
- b. Providing reservation platforms by which payment modes and suspicious reservations would reveal patterns associated with sex trafficking;
- c. Providing or failing to provide appropriate training and education to branded hotels through webinars, seminars, conferences, and online portals;

- d. Providing and controlling customer review and response platforms;
- e. Hosting online bookings on Red Roof's domain;
- f. Requiring branded hotels to use Red Roof's customer rewards program;
- g. Requiring branded hotels to use Red Roof's property management software;
- h. Requiring branded hotels to use approved vendors for internet services or other requirements for Wi-Fi access and filtering;
- i. Providing IT support for all property management systems, owned, operated, and required by Red Roof;
- j. Setting employee wages;
- k. Sharing profits;
- l. Standardizing training methods for employees;
- m. Building and maintaining the facility in a manner specified by the owner;
- n. Standardizing strict rules of operation;
- o. Regular inspections of the facility and operation by owner; and
- p. Setting room rates.

16. Hotel Brand Defendants knowingly benefited, or received something of value, from its commercial business ventures at the Fayetteville RRI through royalty payments, licensing fees, and percentages of the gross room revenue generated by the hotel operations, including rates charged through rooms where Doe was trafficked, as well as in maintaining a positive public image for the Red Roof Inn brand. Red Roof also benefited from gathering personal data from the Wi-Fi it provided to customers including Doe and her trafficker.

17. Hotel Brand Defendants are subject to the jurisdiction of this Court because Red Roof Inn® regularly conducts and transacts business in North Carolina through the operation of

numerous hotels under its brand in North Carolina. Red Roof has derived substantial revenue from services rendered in North Carolina and profited from a commercial business venture that unlawfully provided safe harbor for Doe's traffickers so that she could be sold for commercial sex at the Fayetteville RRI by Red Roof.

18. Defendant ASIP Management Inc. (hereinafter "ASIP"), doing business as the Fayetteville RRI and agent of RRI, is a North Carolina Corporation that can be served through its Registered Agent, 3136 Bordeaux Park Drive, Fayetteville, NC 28306. Defendant ASIP was involved in the staffing and operation of Fayetteville RRI, where the Plaintiff was sex trafficked. Through its relationship with the perpetrators who trafficked Doe, Defendant ASIP knowingly benefited or received something of value from a venture which it knew or should have known had violated the TVPRA. ASIP owned and operated the property and manages Fayetteville RRI known as Red Roof Inn & Suites located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, where Plaintiff alleges injuries related to her sex trafficking occurred.

19. Defendant Shiv Sai Krupa LLC (hereinafter "Shiv"), doing business as the Fayetteville RRI and agent of RRI, is a North Carolina Corporation that can be served through its Registered Agent, 176 Mine Lake Court, #100, Raleigh, NC 27615. Shiv owns and operates the property and manages Fayetteville RRI known as Red Roof Inn & Suites located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, where Plaintiff alleges injuries related to her sex trafficking occurred. Defendant Shiv purchased Fayetteville RRI from ASIP in 2021, Defendant Shiv is the successor entity of Fayetteville RRI.

20. Defendant Savita of Fayetteville Inc. (hereinafter "SFI"), doing business as the Coliseum Inn (hereinafter "Coliseum"), is a North Carolina Corporation who can be served through its Registered Agent, 2507 Gillespie Street, Fayetteville, NC 28306. Defendant SFI was

involved in the staffing and operation of Coliseum, where the Plaintiff was sex trafficked. Through its relationship with the perpetrators who trafficked Doe, Defendant SFI knowingly benefited or received something of value from a venture which it knew or should have known had violated the TVPRA SFI owns and operates the property and manages the business known as Coliseum Inn, where Plaintiff alleges injuries related to her sex trafficking occurred.

21. Laxmi, Hotels of Fay (hereinafter “Laxmi”), doing business as the Cardinal Inn & Suites (hereinafter “Cardinal”), is a North Carolina Corporation that can be served through Registered Agent, 6878 Uppingham Road, Fayetteville, NC 28306. Defendant Laxmi was involved in the staffing and operation of Cardinal located at 2526 Gillespie Street, Fayetteville, North Carolina 28306 where the Plaintiff was sex trafficked. Through its relationship with the perpetrators who trafficked Doe, Defendant Laxmi knowingly benefited or received something of value from a venture which it knew or should have known had violated the TVPRA. Laxmi owns and operates the property and manages the business known as Cardinal Inn & Suites, where Plaintiff alleges injuries related to her sex trafficking occurred.

22. Defendant Kokilaben R. Patel and Suresh Babu (hereinafter “Patel”), doing business as the Crown Inn (hereinafter “Crown”), is a North Carolina individual who can be served through Registered Agent, 540 Levenhall Drive, Fayetteville, NC 28314. Defendant Patel was involved in the staffing and operation of Crown, where the Plaintiff was sex trafficked. Through his relationship with the perpetrators who trafficked Doe, Defendant Patel knowingly benefited or received something of value from its facilitation of or participation in a venture which he knew or should have known had violated the TVPRA. Patel owns and operates the property and manages the business known as Crown Inn, where Plaintiff alleges injuries related to her sex trafficking occurred.

23. Defendant Lili of Fayetteville Inc. (hereinafter “Lili”) doing business as the Airport Inn Budget Motel (hereinafter “Airport Inn”), is a North Carolina Corporation that can be served through its Registered Agent at 2507 Gillespie Street, Fayetteville, NC 28306. Defendant Lili was involved in the staffing and operation of Airport Inn located at 2701 Gillespie Street, Fayetteville, North Carolina 28306 where the Plaintiff was sex trafficked. Through its relationship with the perpetrators who trafficked Doe, Defendant Lili knowingly benefited or received something of value from a venture which it knew or should have known had violated the TVPRA. Lili owns and operates the property and manages the business known as Airport Inn Budget Motel, where Plaintiff alleges injuries related to her sex trafficking occurred.

24. Whenever reference is made in this Complaint to any act, deed or conduct of the Defendants, the allegation is that the Defendants engaged in the act, deed, or conduct by or through one or more of their officers, directors, agents, employees, or representatives who was actively engaged in the management, direction, control, or transaction of the ordinary business and affairs of the Defendants.

### **JURISDICTION AND VENUE**

25. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution, laws, or treaties of the United States (with an amount in controversy that exceeds \$75,000).

26. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims asserted in this action, including the Defendants’ misconduct and omissions, occurred in the judicial district where this action is brought.

27. Further, pursuant to N.C. Gen Stat § 1-82, venue is proper because the defendants

can be served and reside in this district now and at the time Plaintiff's events took place.

### ***SEX TRAFFICKING UNDER FEDERAL LAW AND STATE LAW***

28. Sex trafficking is defined by the TVPRA under 22 U.S.C. § 7102, as “the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act and in which the commercial sex act is induced by force, fraud, or coercion.” This definition combines the three elements of sex trafficking as a criminal offense: the act, the means, and the purpose.

29. While the complete definition of ‘sex trafficking’ is found in the TVPRA under 22U.S.C. § 7102, and it is specifically prohibited under 18 U.S.C. §1591.

30. Pursuant to 18 U.S.C. §1591(a), all who knowingly provide or obtain commercial sex that was provided or obtained through force, fraud, and coercion are guilty of a severe form of sex trafficking. This includes, at a minimum, all of the ‘traffickers’ who recruit, harbor, transport, and provide individuals for forced commercial sex and the ‘johns’ or ‘buyers’ who obtain, solicit, or patronize forced commercial sex.<sup>6</sup>

31. Human Trafficking is also prohibited under North Carolina Law, Pursuant to NC Gen Stat § 14-43.11.

### **FACTUAL ALLEGATIONS**

#### ***The Hospitality Industry’s Facilitation of Sex Trafficking***

32. Human trafficking is the world's fastest growing crime.<sup>7</sup> While the term ‘human

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<sup>6</sup> While the ‘pimps’ or ‘providers’ are often referred to as the ‘traffickers’ and the purchasers are referenced as the ‘Johns’, ‘tricks’, or ‘buyers’ [and such nomenclature is used herein], under federal law *both* categories are ‘traffickers’.

<sup>7</sup> *Human Trafficking is the World’s Fastest Growing Crime*, THE ADVISORY BOARD (May 22, 2017, 9:30 AM), <https://www.advisory.com/daily-briefing/2017/05/22/human-trafficking>.

trafficking’ incorporates all forced labor, the sex trafficking industry alone pulls in an estimated \$99 billion each year, making it the second largest illicit crime industry behind only the sale of *all* illegal drugs.<sup>8</sup>

33. Sex traffickers, or ‘pimps’, use threats, violence, manipulation, lies, debt bondage, and other forms of coercion to compel adults and children to engage in commercial sex acts against their will.

34. The hospitality industry plays a crucial role in the sex trade.<sup>9</sup> The trope of the “no-tell motel”, is certainly not a new one. Hotels have long profited from their reputations as havens of privacy and discretion for sex trafficking offenders. Hotels that offer anonymity and non-traceability through cash payments and loose registration terms for use of their property, are often wrought with criminal activity generally and sex trafficking particularly. Other “high end” hotels have found ways to keep trafficking to a manageable level to allow guests anonymity for participating in sex trafficking and create a safe haven with unspoken terms of use for traffickers, especially how they present and deliver victims to buyers.

35. According to National Human Trafficking Hotline statistics, hotels are the top-reported venue, where sex trafficking acts occur, even over commercial-front brothels.<sup>10</sup> Traffickers and buyers alike frequently use hotel rooms to exploit victims.

36. Traffickers use hotels as the hub of their operations. Inside the privacy afforded by hotel walls, the victims are harbored, raped, assaulted, and forced to service buyers who come to the hotel solely to purchase sex. This is referred to as an “in call”.

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<sup>8</sup> *Profits and Poverty: The Economics of Forced Labor*, INTERNATIONAL LABOR ORGANIZATION (May 24, 2014), [http://www.ilo.org/global/publications/ilo-bookstore/order-online/books/WCMS\\_243391/lang--en/index.htm](http://www.ilo.org/global/publications/ilo-bookstore/order-online/books/WCMS_243391/lang--en/index.htm).

<sup>9</sup> Giovanna L. C. Cavagnaro, *Sex Trafficking: The Hospitality Industry’s Role and Responsibility*, CORNELL UNIVERSITY SCHOOL OF HOTEL ADMINISTRATION (2017), <http://scholarship.sha.cornell.edu/honorstheses/3>.

<sup>10</sup> *National Human Trafficking Hotline Statistics*, THE POLARIS PROJECT (2016), <https://polarisproject.org/resources/2016-hotline-statistics>.

37. Hotels are also the venue of choice for buyers seeking an “out call,” wherein the buyer rents a hotel room and the trafficker delivers the victim to the buyer’s room to complete the illegal and sordid transaction. Not surprisingly, buyers or “johns” typically choose to engage in trafficking sites located away from their homes, naturally leading to the increased involvement of hotels. In New York City alone, 45% of all reported sexual exploitation took place in hotels, including the Ritz Carlton and the Plaza.<sup>11</sup>

38. The sex crime epidemic is industry wide. In the United States, as much as 63% of all trafficking incidents happen in hotels ranging from luxury to economy.<sup>12</sup>

39. Due to the overall complacency and complicity of the hospitality industry in failing to address the issue, hotels are *the* venue of choice for sex trafficking.<sup>13</sup> Traffickers and buyers capitalize on the hotel industry’s general refusal to adopt and enforce mandatory company-wide anti-trafficking policies such as training staff on identifying and responding to human trafficking signs and victims, and establishing safe and secure reporting mechanisms for those who either succumb to or witness these criminal acts.

40. Seventy-five percent of survivors responding to a Polaris Project survey reported coming into contact with hotels at some point during their exploitation, including repeated contact with desk and service personnel. Unfortunately, 94% also disclosed that they never received any assistance, concern, or identification from hotel staff.<sup>14</sup>

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<sup>11</sup> Giovanna L. C. Cavagnaro, *Sex Trafficking: The hospitality Industry’s Role and Responsibility*, CORNELL UNIVERSITY, SCHOOL OF HOTEL ADMINISTRATION (2017), <http://scholarship.sha.cornell.edu/honorstheses/3>.

<sup>12</sup> Michele Sarkisian, *Adopting the Code: Human Trafficking and the Hospitality Industry*, CORNELL HOSPITALITY REPORT, 15(15), 3-10 (2015).

<sup>13</sup> *Hotels Initiative*, THE POLARIS PROJECT, <https://polarisproject.org/initiatives/hotels> (last visited June 19, 2019).

<sup>14</sup> *Recommendations for Hotels and Motels*, THE POLARIS PROJECT, <https://polarisproject.org/hotels-motels-recommendations> (last visited June 19, 2019).

37. Every day, thousands of hotel employees witness manifestations of sex trafficking and commercial exploitation. Thus, the hospitality industry has the greatest opportunity of contact with sex trafficking victims on a person to person level and is in a prime position to prevent, identify and thwart sexual exploitation where it is most likely to occur.

38. From their unique position in this epidemic, hotels and motels with this industry-wide knowledge have the highest obligation to protect their guests from known dangers, including sex trafficking and sexual exploitation, and should be held accountable when they fail to comply. As aptly stated in a publication by the Cornell University School of Hospitality, “the hospitality industry is undoubtedly involved in the sex trafficking industry...and therefore has an inherent responsibility to deter the crime and can be liable for failing to do so.”<sup>15</sup>

39. Training hotel staff to identify the signs of sex trafficking is as critical and obvious a legal obligation for the hospitality industry, as any other safety issue. The presence of sex trafficking and sexual exploitation in a hotel is frequently an obvious occurrence and, although unutilized, underutilized, or ineffectively utilized, numerous well-researched trainings and toolkits have been published to the hotel industry over the last decade to help hotel staff in every position to identify and respond to the signs.<sup>16</sup>

40. From check-in to check-out, there are a number of indicators that traffickers and their victims exhibit during their stay at a hotel. With proper training and the implementation of reasonable security measures, hospitality companies could prevent regular sex trafficking either at a single owned property or at multiple properties under their flag.

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<sup>15</sup> Giavanna L. C. Cavagnaro, *Sex trafficking: The Hospitality Industry's Role and Responsibility*, CORNELL UNIVERSITY, SCHOOL OF HOTEL ADMINISTRATION (2017), <http://scholarship.sha.cornell.edu/honorstheses/3>.

<sup>16</sup> DEPARTMENT OF HOMELAND SECURITY, *Blue Campaign Toolkit*, attached as “Exhibit A.” Available at:

<https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf>.

41. Obvious signs of sex trafficking at a hotel may include: an excess of condoms in rooms, individuals carrying or flashing large amounts of cash, excessive amounts of cash stored in the room, renting two (2) rooms next door to each other, declining room service for several consecutive days, significant foot traffic in and out of room(s), men traveling with multiple women who appear unrelated, women known to be staying in rooms without leaving, women displaying physical injuries or signs of fear and anxiety, guests checking in with little or no luggage, hotel guests who prevent another individual from speaking for themselves, or a guest controlling another's identification documents.<sup>17</sup>

42. Hotel staff who have undergone training are more aware of sex trafficking when it happens and are more willing to report it than hotel staff who have not been trained.<sup>18</sup> Thus, hotel properties adopting relaxed policies and procedures related to sex trafficking, or hotels or brands not requiring all hotel staff be trained, fall short and leave sex trafficking underreported, victims at continued and heightened risk, and traffickers in control.

43. Hospitality companies can and should mandate that *all* staff working at their single property or for their brand across *all* hotel properties adopt practices and complete training on how to prevent, recognize and respond to sex trafficking.<sup>19</sup>

44. Hotel owners and the hospitality industry broadly have been cognizant of their role and responsibilities in the sex trafficking industry for decades.

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<sup>17</sup> *Id.* See also, Shea M. Rhodes, *Sex Trafficking and the Hotel Industry: Criminal and Civil Liability for Hotels and their Employees*, THE INSTITUTE TO ADDRESS CRIMINAL SEXUAL EXPLOITATION, Villanova University School of Law (2015), [https://cseinstitute.org/wp-content/uploads/2015/06/Hotel\\_Policy\\_Paper-1.pdf](https://cseinstitute.org/wp-content/uploads/2015/06/Hotel_Policy_Paper-1.pdf).

<sup>18</sup> Giavanna L. C. Cavagnaro, *Sex Trafficking: The Hospitality Industry's Role and Responsibility*, CORNELL UNIVERSITY, SCHOOL OF HOTEL ADMINISTRATION (2017), <http://scholarship.sha.cornell.edu/honorstheses/3>.

<sup>19</sup> Shea M. Rhodes, *Sex Trafficking and the Hotel Industry: Criminal and Civil Liability for Hotels and their Employees*, The Institute to Address Criminal Sexual Exploitation, Villanova University School of Law (2015), [https://cseinstitute.org/wp-content/uploads/2015/06/Hotel\\_Policy\\_Paper-1.pdf](https://cseinstitute.org/wp-content/uploads/2015/06/Hotel_Policy_Paper-1.pdf).

45. Further, nationwide campaigns recognized the issue of human trafficking in the hotel industry and the lack of internal policies to address it. Such campaigns took initiative as early as 1997 beginning internationally with the United Nations Blue Heart Campaign, and domestically in 2010, with the U.S. Department of Homeland Security's Blue Campaign.<sup>20</sup> These efforts sought to educate both the public and private sectors on identifying and combatting human trafficking, including the hospitality industry. Both campaigns released online resources and toolkits publicly accessible to any entity concerned with human trafficking.<sup>21</sup>

46. Hospitality companies have both the power and responsibility to make sex trafficking difficult for the offenders; yet, they repeatedly fail to execute their own policies. Instead, the hospitality industry continues to facilitate these crimes at their hotels, focusing on their profits rather than protecting the victims of sex trafficking.

***Hotel Brand Defendants are Major Players in the Hospitality Industry***

47. Hotel brands or flags like Hotel Brand Defendants that own and operate the Red Roof Inn® brand lend their name and likeness to third party owners, while the building and operations are run by a franchisee or a third-party management company under the brands' control. There is a mutual benefit shared between the hotel brands and the individual hotels.

48. The average consumer does not see this relationship. Red Roof Inn® as a parent brand gives the franchisee property its identity. It provides signage on and in front of the building that assures customers that if they check into that hotel they can expect the standards consistent with the parent hotel brand. The same brand emblazoned on everything in the hotel from the pens in the bedside tables to the staff uniforms at the front desk.

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<sup>20</sup> *DHS Blue Campaign Five Year Milestone*, DEPARTMENT OF HOMELAND SECURITY (Jul. 22, 2015), <https://www.dhs.gov/blog/2015/07/22/dhs-blue-campaign-five-year-milestone>.

<sup>21</sup> *Human Trafficking and the Hospitality Industry*, DEPARTMENT OF HOMELAND SECURITY, <https://www.dhs.gov/blue-campaign/hospitalityindustry> (last visited June 19, 2019).

49. In addition to brand recognition, a marketing organization, hotel listings in the Global Distribution System (GDS) and other online travel agency databases, the brand provides the franchise hotel with access to its brand wide central reservation system, 800 number, revenue management tools, world-class loyalty programs and a website. Thus, booking and room reservations are controlled by the corporate parent brand.<sup>22</sup>

50. The franchise hotel typically pays around 10% of their total revenue back to the parent hotel brand and is required to develop and maintain the property in accordance with the parent brand's standards as they are laid out in the franchise agreement.

51. Pursuant to the franchise agreement, the parent brand may enforce brand standards through periodic inspections that may include termination of the franchise agreement if the franchise hotel is found to be inadequate and not in compliance with the brand standards. The hotel brand, or parent, has both the right and the obligation to enforce its own standards.

52. At the time of the incidents alleged herein, Defendant Red Roof Inn owned, operated, and controlled the Red Roof Inn® brand.

53. Parent hotel brands may eliminate non-complying hotels from their systems, but it is at the cost and expense of losing keys, which often determine a company's value for investors, as well as terminating royalty payments and revenue that is collected from any non-compliant hotels.

***Defendants' Actual and/or Constructive Knowledge of Sex Trafficking at their Hotel***

54. Both the Brand Hotel Defendants and the additional Hotel Defendants have been on notice of repeated incidences of sex trafficking occurring at their properties, yet failed to take

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<sup>22</sup> Ellen Meyer, *The Origins and Growth of Franchising in the Hotel Industry*, LODGING MAGAZINE (April 10, 2018) <https://lodgingmagazine.com/the-origins-and-growth-of-franchising-in-the-hotel-industry/>.

the necessary action to meaningfully address sex trafficking and persist in failing to take the necessary action to meaningfully address sex trafficking at their hotels.

55. Several courts have found failure to implement policies that are sufficient to combat a known problem in an operation can rise to the level of willful blindness or negligence.<sup>23</sup>

***Defendants' Willful Blindness to Sex Trafficking at Their Hotels***

56. Brand Hotel Defendants are aware that the hospitality industry is a major source of the human trafficking epidemic both in the U.S. and abroad.<sup>24</sup> The United Nations,<sup>25</sup> international non-profits,<sup>26</sup> and the U.S. Department of Homeland Security,<sup>27</sup> have documented this well-known epidemic of human trafficking for years and have brought particular attention to the indispensable role of hotels in the illegal operations of sex traffickers Defendants are well aware of the public outcry against human trafficking, especially when so much of the uproar surrounds the industry.

57. For example, in 2004 End Child Prostitution and Trafficking (“ECPAT-USA”) launched the Tourism Child-Protection Code of Conduct (the “Code”) in the United States, identifying the steps companies would need to take to prevent child sex trafficking. ECPAT-USA

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<sup>23</sup> See *Brown v. Corr. Corp. of Am.*, 603 F.Supp.2d 73, 81 (D.D.C. Mar. 26, 2009); *Trollinger v. Tyson Foods, Inc.*, 2007 WL 1574275, at \*12 (E.D. Tenn. May 29, 2007).

<sup>24</sup> Giovanna L. C. Cavagnaro, *Sex Trafficking: The Hospitality Industry's Role and Responsibility*, CORNELL UNIVERSITY SCHOOL OF HOTEL ADMINISTRATION (2017), <http://scholarship.sha.cornell.edu/honorstheses/3>.

<sup>25</sup> *Global Report on Trafficking in Persons*, UNITED NATIONS OFFICE ON DRUGS AND CRIME (2020), 84 available at [https://www.unodc.org/documents/data-and-analysis/tip/2021/GLOTiP\\_2020\\_15jan\\_web.pdf](https://www.unodc.org/documents/data-and-analysis/tip/2021/GLOTiP_2020_15jan_web.pdf); See also *We must act together to fight exploitation and human trafficking in tourism, say United Nations and international partners*, UNITED NATIONS OFFICE ON DRUGS AND CRIME (April 24, 2012) available at <https://www.unodc.org/unodc/en/press/releases/2012/April/we-must-act-together-to-fight-exploitation-and-human-trafficking-in-tourism-say-united-nations-and-international-partners.html>

<sup>26</sup> The Polaris Project and ECPAT-International have published extensive reports and professional toolkits on human trafficking in the hospitality industry for years.

<sup>27</sup> *Human Trafficking and the Hospitality Industry*, U.S. DEPARTMENT OF HOMELAND SECURITY (2020), available at <https://www.dhs.gov/blue-campaign/hospitalityindustry>; *Hospitality Toolkit*, U.S. DEPARTMENT OF HOMELAND SECURITY (2016), available at <https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf>

identified hotel-specific best practices for preventing sex trafficking, such as: (1) not renting by the hour; (2) not permitting cash payments; (3) monitoring online sex ads such as Craigslist and Backpage for their hotel name and pictures of the rooms; (4) changing Wi-Fi passwords in rooms and cafes regularly; (5) watching for a trend of visitors to the same room; (6) being aware of rooms with excess condoms, lubricants, and towels; (7) requiring all visitors to be logged, including guest name, visitor name, arrival time, departure time, and room number.

58. Brand Hotel Defendants have access to do-not-rent (“DNR”) lists at other branded properties that often list reasons for the refusal to rent, including the suspicion of human trafficking. Brand Hotel Defendants do not utilize this information across the properties they manager or operate, thereby permitting use of their hotel properties by individuals they knew or should have known were involved in sex trafficking at their properties, and failing to protect additional or continued victims, such as Doe, from repeated sex trafficking at their properties.

59. The Defendants also have access to public police reports, news reports and internal reports generated by customers and employees, regarding sex trafficking at the Fayetteville RRI and their additional hotel locations.

60. The Defendants have access to reviews left by guests on websites such as [www.tripadvisor.com](http://www.tripadvisor.com), [www.yelp.com](http://www.yelp.com), [www.google.com](http://www.google.com), and others, wherein guests frequently complain about the prevalence of obvious prostitution, hearing physical violence by pimps, and other signs of human trafficking across various hotel locations, including the hotel where Doe was sex trafficked.

61. A brief examination of just a handful of examples for each Hotel Defendant suffices to show the extraordinary frequency with which the Defendants have long received and continue

receiving evidence and reports that human trafficking runs rampant at the hotel locations where Doe was sex trafficked:

- a. Regarding a February 2022 stay at the Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, a hotel customer wrote a review saying, “...For entertainment, you may enjoy listening in as the drug addict prostitutes negotiate their fee beneath your windows, or the screaming sirens of the many ambulances rushing their patients to the Cape Fear Medical Center just three blocks away.

You will be safe, however, as the Fayetteville police are regular visitors to this place. During my nine day stay, they responded to two domestic violence calls and a drug overdose in the front parking lot.

Routine, I was told!!”<sup>28</sup>

- b. Regarding a January 2015 stay at the Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, a hotel customer wrote a review saying, “- suspicious clientele and cars in parking lot...”<sup>29</sup>

- c. Regarding a May 2018 stay at the Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, a hotel customer wrote a review saying, “by far the worse hotel I have ever stayed in the pictures online are from when place was 1st built. its run down and crampy. ghetto people yelling and screaming in parking lot. room is dirty bed is a king size floor tile. power

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<sup>28</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg, *available at* [https://www.tripadvisor.com/Hotel\\_Review-g49136-d268463-Reviews-Red\\_Roof\\_Inn\\_Suites\\_Fayetteville\\_Fort\\_Bragg-Fayetteville\\_North\\_Carolina.html](https://www.tripadvisor.com/Hotel_Review-g49136-d268463-Reviews-Red_Roof_Inn_Suites_Fayetteville_Fort_Bragg-Fayetteville_North_Carolina.html)

<sup>29</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg, *available at* [https://www.tripadvisor.com/Hotel\\_Review-g49136-d268463-Reviews-Red\\_Roof\\_Inn\\_Suites\\_Fayetteville\\_Fort\\_Bragg-Fayetteville\\_North\\_Carolina.html](https://www.tripadvisor.com/Hotel_Review-g49136-d268463-Reviews-Red_Roof_Inn_Suites_Fayetteville_Fort_Bragg-Fayetteville_North_Carolina.html)

strips every where”<sup>30</sup>

- d. Regarding a June 2020 stay at the Red Roof Inn located at 3136 Bordeaux Park Dr, Fayetteville, NC 28306, a hotel customer wrote a review saying, “...The other rooms were screaming and partying all night. To add, the hotel staff was extremely rude and did not care about hospitality one bit. Do not waste your time and money by staying here.”<sup>31</sup>
- e. Regarding a March 2019 stay at the Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, a hotel customer wrote a review saying, “...Not to forget we were woken by the police banging on the door across the hall for a drug search... We didn't pay much for the room but it sadly wasn't even worth what we did pay. DON'T STAY HERE!!!!”<sup>32</sup>
- f. Regarding a 2019 stay at the Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Terrible , people in the next room having loud sex and there was a locked wooden door between our room ,we asked management to give us a different room ,they were kind , gave us top floor room which was actually much better and bigger condition than second floor room.”<sup>33</sup>
- g. Regarding a 2021 stay at the Airport Inn Budget Motel located at 2701 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review

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<sup>30</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg (May 4, 2018), *available at* <https://www.yelp.com/biz/red-roof-inn-and-suites-fayetteville-fort-bragg-fayetteville-2?q=parking>

<sup>31</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg (June 28, 2020), *available at* <https://www.yelp.com/biz/red-roof-inn-and-suites-fayetteville-fort-bragg-fayetteville-2?q=screaming>

<sup>32</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg (March 13, 2019), *available at* <https://www.yelp.com/biz/red-roof-inn-and-suites-fayetteville-fort-bragg-fayetteville-2?q=drug>

<sup>33</sup> Review of Red Roof Inn & Suites Fayetteville - Fort Bragg (May 4, 2018), *available at* <https://www.yelp.com/biz/red-roof-inn-and-suites-fayetteville-fort-bragg-fayetteville-2?q=parking>

saying, “Dirty disrespect people in the office drug sold in the parking lot burn hole in your blanket take all day to half clean your room just bring your own bleach.”<sup>34</sup>

- h. Regarding a 2022 stay at the Cardinal Inn & Suites located at 2526 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “The guy that runs the motel will catch a attitude if a girl is not one of these girls out here in the streets cuz he wants one of those girls or any girl he sees he also have roaches and bed bugs in that place so bad and everything is falling apart if not worth to stay there.”<sup>35</sup>
- i. Regarding a 2016 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Conditions were near squalid... Prostitutes with high client turnover, and the dope man

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<sup>34</sup> Review of Airport Inn Budget Motel, *available at*

[https://www.google.com/travel/hotels/driftwood%20Budget%20Motel%202701%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20reviews/entity/CgoI5a\\_RmJ-2r8ZuEAE/reviews?q=driftwood%20Budget%20Motel%202701%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20reviews&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EOWv0Ziftq\\_GbhDlr9GYn7avxm44AkAASAHAAQI&ictx=1&sa=X&ved=0CAAQ5JsGahcKEWjI0KyRtZL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAaggDEAEaSQorEicyJTB4ODlhYjEzYTQyNWFIMzBkMzoweDZIOGNiZGIxZjMxNDU3ZTUaABIAEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/driftwood%20Budget%20Motel%202701%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20reviews/entity/CgoI5a_RmJ-2r8ZuEAE/reviews?q=driftwood%20Budget%20Motel%202701%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20reviews&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EOWv0Ziftq_GbhDlr9GYn7avxm44AkAASAHAAQI&ictx=1&sa=X&ved=0CAAQ5JsGahcKEWjI0KyRtZL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAaggDEAEaSQorEicyJTB4ODlhYjEzYTQyNWFIMzBkMzoweDZIOGNiZGIxZjMxNDU3ZTUaABIAEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA)

<sup>35</sup> Review of Cardinal Inn & Suites, *available at*

[https://www.google.com/travel/hotels/cardinal%20inn%20%26%20suites%202526%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20fayetteville%20nc%20yelp/entity/Cgslk62ih4qe7fuCARAB/reviews?q=cardinal%20inn%20%26%20suites%202526%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20fayetteville%20nc%20yelp&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EJOtooeKnu37ggEQk62ih4qe7fuCATgCQABIAcABAq&ictx=1&sa=X&ved=0CAAQ5JsGahcKEWjI0KyRtZL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAaggDEAEaSQorEicyJTB4ODlhYjEzMDlkNDg5MzNjOToweDgyZjdiNGYwYTBIODk2OTMaABIAEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/cardinal%20inn%20%26%20suites%202526%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20fayetteville%20nc%20yelp/entity/Cgslk62ih4qe7fuCARAB/reviews?q=cardinal%20inn%20%26%20suites%202526%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306%20fayetteville%20nc%20yelp&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EJOtooeKnu37ggEQk62ih4qe7fuCATgCQABIAcABAq&ictx=1&sa=X&ved=0CAAQ5JsGahcKEWjI0KyRtZL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAaggDEAEaSQorEicyJTB4ODlhYjEzMDlkNDg5MzNjOToweDgyZjdiNGYwYTBIODk2OTMaABIAEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA)

next door with his unreasonably high music would have made this visit a nightmare had i dared to stay overnight. Stay clear!”<sup>36</sup>

- j. Regarding a 2016 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “The house cleaners are really amazing and good people. But honestly other than that I would not recommend this place police are always here there is alot of prostitute's and drugs here. A sheriff told me this was the #1 place of Fayetteville for Human Trafficking. There's a lot of domestic problems around here as well. There are rooms that are clean but there are a lot of reports of bed bugs and roaches.”<sup>37</sup>
- k. Regarding a 2022 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Rundown

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<sup>36</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA)

<sup>37</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA)

but had a good sleep. Bad area? Drug use apparent. Not clean but looked better in room that I thought”<sup>38</sup>

- l. Regarding a 2022 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Wrong side of the road. Super sketchy with the crowd that hangs out in parking lot. Cops were present often”<sup>40</sup>
- m. Regarding a 2016 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Rooms are okay a lot of young girls”<sup>39</sup>
- n. Regarding a 2018 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Too many drawers! doors connect rooms but neighbors weren't happy at all when I

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<sup>38</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIaEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIaEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA)

<sup>39</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIaEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABAg&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIaEhQKBwjmDxALGBcSBwjmDxALGBgYATICEAAqBAoAGgA)

stopped in for a visit. lol.. when I got here the woman first gave me a key card to someone else's room, she was tryna shack me up with ppl lol.. you could totally move in and I promise you no one would know, there's no house keeping here.”<sup>40</sup>

- o. Regarding a 2020 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Nice hotel, management was weird. Okay housekeeping. Good sized rooms for cheap. Decent car services but very noisy and very late times.”<sup>41</sup>
- p. Regarding a June 2021 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “This place isn't anything but a place for hookers to do their tricks and for drug dealers to sell their drugs. It needs to be shut down immediately! These

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<sup>40</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIgzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABA&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIgzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABA&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA)

<sup>41</sup> Review of Coliseum Inn, *available at*

[https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIgzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABA&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm\\_campaign=sharing&utm\\_medium=link&utm\\_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA](https://www.google.com/travel/hotels/Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306/entity/CgsIgzavoWNx5W-ARAB/reviews?q=Coliseum%20Inn%202507%20Gillespie%20St%2C%20Fayetteville%2C%20NC%2028306&g21b=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4821091%2C4852066%2C4861688%2C4864715%2C4875646%2C4875648%2C4878645%2C4886480%2C4887074%2C4888422%2C4891494%2C4892545%2C4893074&hl=en-US&gl=us&ssta=1&rp=EICM2r6FjceVvgEQgIzavoWNx5W-ATgCQABIAcABA&ictx=1&sa=X&ved=0CAAQ5JsGahcKEwjw17D2uJL7AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESCgoCCAMKAggDEAEaSQorEicyJTB4ODlhYjEzMDgzYmJlMmNmZDoweGJlMmIxYzY4NTdkNjg2MDAaABIAEhQKBwjmdxALGBcSBwjmdxALGBgYATICEAAqBAoAGgA)

owners are well aware of what is going on but they are just after concerned with lining their pockets with dirty money!!!”<sup>42</sup>

- q. Regarding a April 2019 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “...Entry way floor was sticky. Cigarette butts and behind the table and beds. Black cigarette marks all over the walls, as if fresh. The maid's male friend came to harrass her while she was cleaning rooms. A homeless drunk man knocked on our door for 20 minutes at 8 in the morning...”<sup>43</sup>
- r. Regarding a April 2020 stay at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “...Beds were dirty when I arrived and there was weed all in the sheets roaches and water bugs love it here, y'all should rent to them lmao. Only thing I don't mind is the fights everyday outside my door. Very good entertainment.”<sup>44</sup>
- s. Regarding a 2017 stay at the Crown Inn located at 2502 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “Hooker housing”.<sup>45</sup>

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<sup>42</sup> Review of Coliseum Inn, *available at* [https://www.tripadvisor.com/Hotel\\_Review-g49136-d121940-Reviews-Coliseum\\_Inn-Fayetteville\\_North\\_Carolina.html#REVIEWS](https://www.tripadvisor.com/Hotel_Review-g49136-d121940-Reviews-Coliseum_Inn-Fayetteville_North_Carolina.html#REVIEWS)

<sup>43</sup> Review of Coliseum Inn, *available at* [https://www.tripadvisor.com/Hotel\\_Review-g49136-d121940-Reviews-Coliseum\\_Inn-Fayetteville\\_North\\_Carolina.html#REVIEWS](https://www.tripadvisor.com/Hotel_Review-g49136-d121940-Reviews-Coliseum_Inn-Fayetteville_North_Carolina.html#REVIEWS)

<sup>44</sup> Review of Coliseum Inn, *available at* <https://www.yelp.com/biz/coliseum-inn-fayetteville-2>

<sup>45</sup> Review of Crown Inn, *available at* [https://www.google.com/travel/hotels/crown%20inn%20fayetteville%20nc%20REVIEWS/entity/CgoI0dmCyv3G-MUnEAE/reviews?q=crown%20inn%20fayetteville%20nc%20REVIEWS&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4852066%2C4861688%2C4864715%2C4878645%2C4885164%2C4886480%2C4887844%2C4888422%2C4891494%2C4892545%2C4893075%2C4898158&hl=en-US&gl=us&ssta=1&rp=ENHZgsr9xvjFJxDR2YLK\\_cb4xSc4AkaASAHAQAQI&ictx=1&sa=X&ved=0CAAQ5JsGa](https://www.google.com/travel/hotels/crown%20inn%20fayetteville%20nc%20REVIEWS/entity/CgoI0dmCyv3G-MUnEAE/reviews?q=crown%20inn%20fayetteville%20nc%20REVIEWS&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4308226%2C4597339%2C4718358%2C4723331%2C4731329%2C4757164%2C4814050%2C4816977%2C4852066%2C4861688%2C4864715%2C4878645%2C4885164%2C4886480%2C4887844%2C4888422%2C4891494%2C4892545%2C4893075%2C4898158&hl=en-US&gl=us&ssta=1&rp=ENHZgsr9xvjFJxDR2YLK_cb4xSc4AkaASAHAQAQI&ictx=1&sa=X&ved=0CAAQ5JsGa)

- t. Regarding an October 2020 stay at the Crown Inn located at 2502 Gillespie Street, Fayetteville, NC 28306, a hotel customer wrote a review saying, “this place is the worst stayed there for mounths the owner of the hotel shes drama she tell all the customer business to other customers talk about the women to eachother where they began fussing because of her talking about people her house keepers had covid19 never told or inform the people that stayed there she loves drama her husband gets high likes black women always saying things he should not do not trust this lady at all she will call the police on you have you locked up she is a messy person if you stay do not have her in your business the worst place ever.....”<sup>46</sup>

***The Sex Trafficking of Jane Doe***

62. Plaintiff Jane Doe’s life was devalued and otherwise adversely affected by each Defendant’s individual and combined inattention to the realities of sex trafficking. Each Defendant chose to maintain policies and procedures, ignoring and maintaining practices that permitted Doe to be sex trafficked repeatedly. Doe was thereby subject to continued threats of violence, unwanted drugging, beating and sexual assaults by traffickers and buyers who maintained control over Doe.

63. In 2019, Doe met Trafficker 1 while at a co-worker’s housewarming party when she was thirty-two (32) years old. Doe became friends with Trafficker 1. In November 2019, Doe and Trafficker 1 went to a hotel where they met a man (hereinafter referred to as “Trafficker 2”). This man was the gang leader of Trafficker 1.

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&ts=CAESCgoCCAMKAaggDEAEaSQorEicyJTB4ODlhYjEzMDgzNGY2M2ZiZjoweDI3OGJlMjM3ZDk0MGFjZ  
DEaABlAehQKBwjmDxALGBYsBwjmDxALGBcYATICEAAqBAoAGgA

<sup>46</sup> Review of Coliseum Inn, available at <https://www.yelp.com/biz/crown-inn-fayetteville>

64. Trafficker 2 and Trafficker 1 sexually assaulted and physically abused Doe that same day. Doe was threatened by Trafficker 1 and Trafficker 2, who told her that both of her children would be murdered and Doe would have to watch the murder of her children if she disobeyed Trafficker 1 or Trafficker 2's orders. Trafficker 1 and Trafficker 2 would then force Doe to meet a monetary quota every day by performing commercial sexual acts. In order to solicit buyers for the sexual acts, Doe was listed on a popular advertisement website known for sex trafficking. Doe was also trafficked by use of Trafficker 1 and Trafficker 2's gang affiliation. Trafficker 1 and Trafficker 2 would arrange for their gang members or illicit drug dealer affiliates to rape and abuse Doe. Trafficker 1 and Trafficker 2 would use physical violence, forced drug use and physical drug addiction, as well as intimidation to force Doe to be trafficked five to ten times per day. Trafficker 1 and Trafficker 2 trafficked Doe from November 2019 to December 2019.

65. By means of a combination of force, coercion, violence, threats of violence, manipulation, forced addiction, and deprivation of basic survival necessities such as food, water, transportation, shelter, and clothing, Doe was watched over and held captive being sex trafficked multiple times per day at Defendants' hotel locations.

66. During the time that she was trafficked, Trafficker 1 and Trafficker 2 frequently rented rooms at the Defendants' hotel locations because the rooms provided convenient, anonymous, and relatively central locations for buyers or "johns" who would pay cash to obtain Doe, a coerced and forced victim, for commercial sex acts.

67. Throughout her trafficking, Trafficker 1 and Trafficker 2 connected with buyers by posting or causing to be posted, advertisements on a site known for human trafficking, featuring her images and advertising Doe's availability for commercial sex with buyers without her consent.

68. Doe was forced to have sex with approximately five to ten buyers every day she was trafficked in Defendants' hotels.

69. From approximately November 2019 through December 2019, while under the coercive control of a trafficking operation, Doe was held against her will in hotel rooms rented by her or her trafficker(s) who sex trafficked her for their profit and benefit.

70. During the time she was trafficked, Doe's trafficker(s) constantly shuffled her back and forth among hotels, often visiting the same hotels repeatedly.

71. While at the Defendants' hotels, Doe's traffickers violently attacked and beat her, and psychologically tormented her by threatening to kill her children, stealing her credit card, and waiting outside of the hotel while Doe was forced to meet with buyers, all to ensure that she could not escape.

72. During her captivity at Defendants' hotels, Defendants accepted cash payments from traffickers for rooms where Doe was sexually assaulted, continuously abused physically and verbally, psychologically tormented, kidnapped, and held against her will in Defendants' hotel locations listed above. The traffickers kept Doe on illicit drugs at regular intervals to create a physical addiction, this was one of their methods of coercing Doe into being compliant while being sex trafficked. Doe was visibly deteriorating, losing over 60 pounds over the time of her sex trafficking. During the time she was trafficked Doe became a victim of a violent gang rape and was repeatedly physically and mentally abused.

73. Every time Doe interacted with Defendants' staff, it was readily apparent that Doe was not at their property under her own volition, but instead was under the control of often brutal traffickers.

74. The traffickers of Doe followed a repetitive and routine procedure during stays at the Defendants' hotels outlined below. The repetitive and routine procedures indicate that Defendants knowingly benefited from what they knew or should have known was the sex trafficking of Doe at their properties and in their rented hotel rooms.

***The Sex Trafficking of Doe at the Fayetteville RRI***

75. Plaintiff Doe was subject to sex trafficking at the Red Roof branded Red Roof Inn located at 3136 Bordeaux Park Drive, Fayetteville, North Carolina 28306 (hereinafter the "Fayetteville RRI").

76. Upon information and belief Trafficker 2 found a haven for his illegal and illicit activities at Fayetteville RRI. Trafficker 2 consistently used similarly located rooms at the Fayetteville RRI property, near a staircase and hotel exit, as a base for both drug and sex trafficking. He brought Doe to the property multiple times to threaten, drug, and coerce her for the purpose of commercial sex acts. Plaintiff Doe was taken to the Fayetteville RRI by Trafficker 2, who on each visit escorted Doe through a side door to the same previously rented room, walking up the stairs to either the second or third floor to a room near the staircase. Each time Trafficker 2 entered the room with a key card, while Doe kept her eyes pierced to the floor in compliance and fear. Doe entered the room followed by Trafficker 2 who ran drug deals out of the same room. Trafficker 2 then used drugs to further control Doe. Trafficker 2 would leave the room and a drugged Doe would then be met by multiple buyers who entered through the lobby. Trafficker 2 left the room before buyers arrived, but would remain nearby. Trafficker 2 along with his affiliates would remain near the lobby or just outside in the public areas including the front lobby, halls, staircase and/or parking lot as Doe was being sex trafficked by multiple buyers.

77. At the Fayetteville RRI, Trafficker 2 and his associates checked into the hotel using their own or assumed names on repeated occasions for multiple nights providing a safe haven from other motel locations that were more frequented by police.

78. At the Fayetteville RRI, there was constant foot traffic due to the use of Trafficker 2's room for both sex and drug trafficking. This activity would have been monitored by security cameras that were present at this location.

79. While Doe was at the Fayetteville RRI, there were several consistent red flags, including, but not limited to: a known trafficker and his associates using the room for illicit drug and sex trafficking; obvious signs of illegal drug use; frequent requests for linen changes by Trafficker 2; unusually large numbers of used condoms left in the trash; unusually large number of male visitors going in and out of the room that Doe was taken to; physical abuse and loud altercations behind closed doors; broken furniture in the room; should the motel staff have seen Doe on a security camera they would have witnessed visible signs of prior physical abuse, including bruising on Doe's neck and black eyes, as well as grab marks on her arms.

80. Manager and owner of Fayetteville RRI and Hotel Brand Defendants' representatives responded to online customer complaints regarding red flags at the Fayetteville RRI hotel.

81. These red flags left by both traffickers and buyers utilizing the property were open and obvious to staff and should have been reported to management and Red Roof Inn corporate by staff, as well as customer reviews and complaints that required urgent attention at every level.

82. Plaintiff was sex trafficked, drugged, threatened and otherwise coerced into sex trafficking at this Red Roof Inn location.

*The Sex Trafficking of Doe at the Coliseum Inn*

83. Plaintiff Doe was subject to sex trafficking at the Coliseum Inn located at 2507 Gillespie Street, Fayetteville, NC 28306 (hereinafter the “Coliseum”).

84. Plaintiff Doe was trafficked in the same room at the Coliseum on multiple occasions between November 2019 and December 2019. She repeatedly encountered the same staff person who was a male and who presented himself as the owner or manager of the property. This staff person was on the property most of the time. While being trafficked at the Coliseum either Trafficker 1 or Trafficker 2 maintained control over Doe through physical violence and threats, as well as the multiple control tactics described above in Paragraphs 62 to 74, including forced drug use, physical assaults, and constant threats.

85. During their stays at the Coliseum, Plaintiff Doe, Trafficker 1, Trafficker 2, and any of Trafficker 1’s associates would check into the hotel using either their own names or aliases, always requesting the same room on the backside of the motel and each time used cash to pay for the room rentals.

86. While Doe was at the Coliseum, there were numerous and consistent red flags that were obvious to the hotel staff, including, but not limited to: paying for stays in cash; obvious signs of illegal drug use; frequent requests for linen changes; unusually large numbers of used condoms left in the trash; unusually large numbers of male visitors going in and out of the room where Doe was kept; physical abuse in public spaces; visible signs of prior physical abuse; and continuous living out of the hotel room.

87. These red flags were open and obvious to anyone working, managing or maintaining this motel.

88. Plaintiff was repeatedly taken behind closed doors to be sex trafficked repeatedly and was sexually assaulted at this location multiple times.

***The Sex Trafficking of Doe at the Cardinal Inn & Suites***

89. Plaintiff Doe was subject to sex trafficking at the Cardinal Inn & Suites located at 2526 Gillespie Street, Fayetteville, NC 28306 (hereinafter the “Cardinal”).

90. Plaintiff Doe was trafficked on one occasion at the Cardinal sometime between November 2019 and December 2019. While being trafficked at the Cardinal Trafficker 2 maintained control over Doe through threats, as well as the multiple control tactics including forced drug use and constant threats.

91. At the Cardinal, another victim of Trafficker 2 lived consistently at the Cardinal, and her name was used to check into the room that where Doe was taken to be trafficked and sold to multiple buyers.

92. While Doe was at the Cardinal, it resulted in several consistent red flags, including, but not limited to: a known trafficker using the same room to house a number of unrelated women; obvious signs of illegal drug use; unusually large numbers of used condoms left in the trash; unusually large number of male visitors going in and out of the room Doe and multiple victims were trafficked out of; visible signs of prior physical abuse; and at least one victim living out of the hotel room.

93. These red flags were open and obvious to anyone working at this motel.

94. Plaintiff was sex trafficked by multiple buyers at this location.

***The Sex Trafficking of Doe at the Crown Inn***

95. Plaintiff Doe was subject to sex trafficking at the Crown Inn located at 2502 Gillespie Street, Fayetteville, NC 28306 (hereinafter the “Crown”).

96. Plaintiff Doe was taken by an associate of Trafficker 2, who was also a trafficker, to a room at the Crown, where the associate trafficked women regularly. The associate took Doe to this room to be sex trafficked on two occasions to four different buyers. This associate of Trafficker 2 consistently rented the same room for the purposes of sex trafficking from the Crown from approximately November 2019 through December 2019.

97. When Doe was taken to the Crown, Trafficker 2's associate had already checked into a room and was running his illicit businesses from this location. The associate did not live at this motel, but did consistently use this same motel room to avoid taking drug and sex trafficking home to his family.

98. At the Crown, there was constant foot traffic in and out of the room Doe was taken to be trafficked. The Crown is a well-known location for both drug and sex trafficking.

99. At the Crown, Doe was sexually assaulted multiple times by multiple individuals.

100. While Doe was at the Crown, it resulted in several consistent red flags, including, but not limited to: being taken to a room being used repeatedly for criminal activity; obvious signs of illegal drug use; unusually large numbers of used condoms left in the trash; unusually large number of male visitors going in and out of the room Doe was being trafficked in; visible signs of prior physical abuse; and continuous use of the hotel room for illicit purposes by the male who brought Doe to the Crown.

101. These red flags were open and obvious to anyone working at this motel.

102. Plaintiff was repeatedly sex trafficked by multiple buyers at this location.

***The Sex Trafficking of Doe at the Airport Inn Budget Motel***

103. Plaintiff Doe was sex trafficked at the Airport Inn Budget Motel located at 2701 Gillespie Street, Fayetteville, NC 28306 (hereinafter the "Airport Inn").

104. From approximately November 2019 through December 2019, Trafficker 2 stayed at the Airport Inn on repeated occasions, while Trafficker 1 was at the Airport Inn continuously, living at the motel out of one to two rooms and encountering the same hotel staff. Trafficker 1 and Trafficker 2 maintained complete control over Doe by use of violence and control.

105. At the Airport Inn, Plaintiff Doe, Trafficker 1, Trafficker 2, or any of their known associates would check into the hotel using either their own or assumed names. They would rent one to three rooms during each stay over a continuous period.

106. A housekeeper at the Airport Inn was known to be trafficked by Trafficker 2.

107. Doe was abducted and drugged in the parking lot at the Airport Inn outside of the room where she was held. The abductors would drive her to a secluded street to sexual assault her. Completely paralyzed with a tranquilizer type of drug she was conscious and aware, but her body was immobile. Doe was helpless as seven men assaulted her. Doe was returned to the Airport Inn parking lot drugged and completely disrobed, unable to walk, she was taken by an associate of Trafficker 2 to the motel room where Trafficker 1 was staying.

108. At the Airport Inn, there was constant foot traffic. Trafficker 1 and Trafficker 2 would rent multiple rooms at a time. Upon information and belief, this location continues to be used for the purposes of sex trafficking to this day.

109. At the Airport Inn, Doe was sex trafficked five or more times per day out of the same room.

110. While Doe was at the Airport Inn, there were several consistent red flags, including, but not limited to: paying for stays in cash; obvious signs of illegal and forced or coerced drug use; frequent requests for linen changes; unusually large numbers of used condoms left in the trash; unusually large numbers of male visitors going in and out of the room Doe was trafficked in;

physical abuse in public spaces; visible signs of prior physical abuse; and the continuous living out of the hotel room paying for rooms in cash only.

111. These red flags were open and obvious at this location.

112. Plaintiff was sex trafficked dozens of times at this location.

***The Defendants Facilitated the Trafficking of Doe***

113. Defendant Red Roof Inn is a signatory of the ECPAT Code<sup>47</sup> and thereby have promised to adopt policies to prevent and combat trafficking. Despite their promises, Red Roof Defendants have failed to implement most, if not all these policies.

114. Defendants benefit from sex trafficking and have benefited specifically from the sex trafficking venture that entrapped Doe. Red Roof Defendants knowingly or negligently aided her traffickers. The Defendants provided rooms to Doe's traffickers, when they knew, or should have known, that Doe's traffickers were using their hotel rooms to force Doe into commercial sex acts, physically threaten her, drug her and subject her to repeated sexual exploitation as they maintained her in sexual servitude.

115. Defendants knew, or should have known, that Doe was being trafficked and that Defendants were knowingly benefiting financially from said activity, because Doe's traffickers frequented the Defendants' hotels and had multiple victims who were trafficked, coerced, drugged and threatened at this location.

116. Defendants knew, or should have known, that Doe was being trafficked because Trafficker 2 had daily quotas and would have victims and buyers frequenting his room and the hotel property. Trafficker 2 engaged in suspicious behavior that indicated he used the Defendants' hotel rooms for trafficking activities.

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<sup>47</sup> See *Our Code Members*, ECPAT, <https://www.ecpatusa.org/code-members>

117. Defendants knowingly benefited, while willingly or negligently turning a blind eye to providing lodging to Doe's traffickers for the purposes of harboring and maintaining Doe while she was being sex trafficked.

118. Defendants profited from the sex trafficking of Doe and knowingly or negligently aided Doe's traffickers in their sex trafficking scheme. The Defendants took no action as Doe was trafficked at this hotel with different male guests who arrived without any luggage.

119. Defendants benefited from the trafficking of Doe by knowingly or negligently maintaining lodging and providing cover to those who purchased sex from Doe while she was being trafficked.

120. Defendants had the opportunity to stop Doe's traffickers and offenders like them from victimizing Doe and others like her. Instead, the Defendants failed to take reasonable measures to stop the sex trafficking occurring from and within its property.

121. Defendants financially benefited from the sex trafficking of Doe, and other victims like her, and developed and maintained business models that attracted and fostered the commercial sex market for traffickers and buyers alike

122. Defendant Red Roof Inn enjoys a steady stream of income that sex traffickers bring to their budget level hotel brands, such as Red Roof Inn® by Red Roof.

123. Red Roof Defendants financially benefit from their ongoing reputation for privacy, discretion, and the facilitation of commercial sex.

124. Despite such obvious indicators of illegal activity and sex trafficking, Red Roof Defendants failed to take any steps to alert the authorities, properly intervene, or take reasonable security steps to improve awareness of sex trafficking and/or prevent sex trafficking on their properties.

125. Defendant Red Roof Inn maintained brand deficiencies to maximize profits by:
- a. Opening and operating in locations known for sex trafficking in order to maximize the number of hotel rooms under their brand flag.
  - b. Foregoing the cost of training employees and managers on how to spot the signs of human trafficking and sexual exploitation and the appropriate steps to take to eliminate such activity.
  - c. Failing to refuse room rentals, or report guests to law enforcement, in order to maximize the number of rooms occupied and the corresponding rates, even if the rooms were rented to sex traffickers or buyers; and
  - d. Reducing security costs by foregoing proper security measures, including, but not limited to, employing qualified security officers to actively combat human trafficking and sexual exploitation.

126. As a direct and proximate result of the Defendants' egregious practices, Doe and victims of sex trafficking and exploitation like her, have been permanently injured and damaged physically, emotionally, psychologically, and financially.

### **CAUSES OF ACTION**

***COUNT ONE: 18 U.S.C. § 1595  
Trafficking Victims Protection Reauthorization Act of 2008 ("TVPRA")  
(Against all Defendants)***

127. Plaintiff Doe incorporates each foregoing allegation.

128. Doe is a victim of sex trafficking within the meaning of 18 U.S.C. § 1591(a) and is therefore entitled to bring a civil action under 18 U.S.C. § 1595.

129. The Defendants' acts, omissions, and commissions, taken separately and/or together, outlined above, constitute a violation of 18 U.S.C. § 1595. Specifically, the Defendants had a statutory obligation not to benefit from a venture that they knew, or should have known, to

engage in violations of the TVPRA, including violations of 18 U.S.C. § 1591(a). At all relevant times, through their acts, omissions and commissions the Defendants breached this duty by knowingly benefiting from a venture it knew or should have known sex trafficked Doe through the use of force, fraud and coercion.

130. The Defendants have financially benefited as a result of these acts, omissions, and/or commissions by keeping rooms open, keeping operating costs low, and maintaining the loyalty of the segment of their customer base that seeks to participate in the sex trade. Moreover, the Defendants directly benefitted from the trafficking of Doe on each occasion they received payment for rooms that she was being kept in at the Defendants' hotels. The actions, omissions, and/or commissions alleged in this pleading were the but for and proximate cause of Doe's injuries and damages.

131. Doe has suffered substantial physical and psychological injuries as the result of being trafficked and sexually exploited at the Defendants' hotels and properties.

***COUNT TWO: NEGLIGENCE***  
***(Against all Defendants)***

132. Plaintiff Doe incorporates the forgoing allegations.

133. The Defendants had a duty to use reasonable care to open and maintain a lodging establishment that included to select, train, supervise, and retain employees working at or around the properties, including but not limited to, proper training and or supervision relating to the observation, investigation, security and reporting of signs of guest misconduct, including, but not limited to, human trafficking, threats or use of violence, sexual assaults, and sexual exploitation in or about their establishments.

134. Defendants had a duty to use reasonable care to ensure the safety and security of guests at their hotels, including Doe.

135. Defendants breached their duty and did not change policies that it knew or should have known encouraged or supported the sex trafficking of Doe and other victims like her. Defendants did not implement and/or enforce any anti- human trafficking policies that could have saved Plaintiff from being sex trafficked at Red Roof Inn, Airport Inn Budget Motel, Cardinal Inn & Suites, and Coliseum Inn properties. Upon information and belief, at the time of the incidents alleged herein, Defendant Red Roof Inn and Defendant Fayetteville RRI were in an agency relationship with Defendant ASIP to manage the Red Roof Inn property where Plaintiff was threatened, coerced and sex trafficked.

136. Defendant Red Roof Inn exercised ongoing and systemic control over operations sufficient to establish an agency relationship with the Fayetteville RRI and Defendant ASIP.

137. Throughout this time, as outlined above, the Defendants and/or their actual and/or apparent agents and/or employees, repeatedly failed to observe and report signs of guest misconduct at their hotels and/or properties, including, but not limited to, signs of human trafficking and or sexual exploitation taking place on the premises. Furthermore, upon information and belief, the Defendants, and/or their actual and/or apparent agents and/or employees, repeatedly failed to warn their customers, including Doe of said trafficking.

138. Additionally, prior to the incidents alleged herein, the Defendants failed to institute practices that would have prevented the trafficking of Doe, including to properly train their employees and agents regarding security and the detection of guest misconduct and illegal activity in their hotels and on their properties, including, but not limited to, signs of human trafficking and sexual exploitation.

139. The Defendants breached this duty of care by acts, omissions, and commissions including, but not limited to:

- a. Failure to adequately train, supervise, audit, and retain employees and franchisees to ensure proper monitoring of surveillance cameras at their hotels and properties for signs of human trafficking and/or sexual exploitation.
- b. Failure to adequately train, supervise, audit, and retain employees and franchisees to ensure proper monitoring of the number of guests in each room of their hotels, and non-guest visitors in their hotels or on their properties.
- c. Failure to ensure, provide, and/or train adequate security in their hotels and/or on their properties with the knowledge that said premises had a history of trafficking;
- d. Failure to adequately train, supervise, audit, and retain employees and franchisees, to ensure proper monitoring of their hotels for signs of dangerous conditions including, but not limited to, human trafficking, sexual exploitation, and rape, by ignoring any combination of the following conditions:
  - i. the repeated refusal of maid service;
  - ii. the repeated, almost exclusive, use of side or rear exits for ingress and egress;
  - iii. the number and frequency of visitors entering and exiting the hotel and/or property;
  - iv. guests present in any particular room in excess of the room's capacity;
  - v. signs of the repeated verbal abuse, physical abuse, restraint and/or confinement of an individual by another;
  - vi. signs of control over an individual and/or an individual's personal property by another, including, but not limited to, identification documents, phones and credit cards;

- vii. signs of deprivation including, but not limited to, diminished personal hygiene, lack of luggage, malnourishment, submissiveness, and inappropriate attire; and
  - viii. the repeated renting of specific rooms in the hotel and/or presence on the property.
- e. Failure to adequately train, supervise, audit, and retain employees and franchisees, to ensure proper monitoring of their hotels and their properties for signs of suspicious behavior on the premises, which would have alerted the Defendants to the sex trafficking of Doe including, but not limited to loud noises and sounds of distress coming from rooms and areas in the hotel and/or on the property, the odor of drugs emanating from rooms and areas in the hotel and/or on the property, discarded drug paraphernalia, non-guests entering and exiting rooms in the hotel and/or on the property, the repeated renting of specific rooms in the hotel and/or presence on the property, and the apparent purchasing of sex acts in the hotel and/or on the property;
- f. Failure to adequately train, supervise, audit, and retain its actual and/or apparent agents, servants and/or employees, including, but not limited to, training to ensure the investigation of suspicious behavior at their hotel and/or properties which would have alerted the Defendants to the sex trafficking of Doe;
- g. Failure to adequately train, supervise, and retain its actual and/or apparent agents, servants and/or employees, including, but not limited to, training to ensure proper reporting to law enforcement of signs of guest misconduct at their hotels and/or on

their properties, including, but not limited to human trafficking and sexual exploitation;

- h. Failure to adequately train, supervise, and retain its actual and/or apparent agents, servants and/or employees, including, but not limited to, training to ensure a timely response and investigation into guest complaints regarding suspicious behavior at their hotels and/or on their properties, which would have resulted in their discovery of the sex trafficking of Doe;
- i. Failure to provide adequate security and take reasonable steps to protect Doe; and
- j. Being otherwise careless and negligent.

140. As a direct and proximate result of the aforementioned negligent acts, omissions, and/or commissions by the Defendants, Trafficker 1 and Trafficker 2 were in violation of N.C. Gen Stat § 14-43.11, 14-43.12 and 14-43.13, and as a result Doe was otherwise irreparably injured, both physically and psychologically. Said acts were repeatedly perpetrated at the Defendants' hotels and the Defendants failed to prevent or thwart such horrible acts. The imminent harm described above, as well as Doe's injuries, were a foreseeable and preventable result of the Defendants' negligence.

141. The actions, omissions, and/or commissions alleged in this pleading were the, but for and proximate cause of Doe's injuries and damages.

142. For the reasons set forth herein, Plaintiff, Doe suffered and will continue to suffer substantial economic, physical and psychological injuries as the result of being sex trafficked at the Defendants' hotels and properties in violation of NC Gen Stat § 14-43.11, 14-43.12 and 14-43.13.

***COUNT THREE: NC Gen Stat § 14-43.18  
North Carolina Human Trafficking Statute  
(Against all Defendants)***

143. Plaintiff Doe incorporates the foregoing allegations.

144. North Carolina specifically allows for the recovery of damages pursuant to NC Gen Stat. § 14.43.18.

145. At all times relevant herein, the Defendants by and through their agents, servants and employees, knew or should have known that sex trafficking was occurring generally, and that Plaintiff Doe was being trafficked specifically.

146. As outlined more fully above, numerous red flags, open and obvious to the Defendants and their employees, were seemingly overlooked in the pursuit of financial gain.

147. As a result, the named Defendants did in fact receive financial benefit or other consideration of value from sex trafficking generally and the trafficking of Plaintiff Doe specifically.

148. As a direct and proximate result of the trafficking, which occurred at the Defendants' properties, Plaintiff suffered and suffered and will continue to suffer substantial economic, physical and psychological injuries.

***COUNT FOUR: PUNITIVE DAMAGES  
(Against all Defendants)***

149. The previous Paragraphs of this Complaint are incorporated as if fully set forth herein. Plaintiff Doe incorporates the foregoing allegations.

150. The actions of the Defendants complained of herein were willful, wanton and reckless, and showed a total and complete disregard for the rights and safety of Plaintiff Doe which the Defendants knew or should have known would lead to her injury. Therefore, Defendants are liable, jointly and severally, for punitive damages.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff Jane Doe, requests that the jury selected to hear this case render a verdict in her favor on all counts alleged, and against each and every named Defendant, jointly and severally, and that it award damages to her in an amount which will adequately compensate her for the injuries and damages she sustained due to the Defendants' conduct outlined as follows:

- a. That Plaintiff have and recover all available compensatory damages for each cause of action, including but not limited to past and future medical expenses; past and future lost wages and loss of earning capacity; past and future emotional distress; consequential and/or special damages; all available noneconomic damages, including but not limited to pain, suffering, and loss of enjoyment of life;
- b. A jury trial on all actions so triable;
- c. The disgorgement of profits obtained through unjust enrichment;
- d. Restitution;
- e. Statutory and/or treble damages, where available;
- f. Punitive damages;
- g. Attorneys' fees and expenses;
- h. The costs of this action;
- i. Pre- and post-judgment interest; and
- j. Any other relief the Court or jury deems appropriate.

Dated: November 14, 2022

RESPECTFULLY SUBMITTED,

/s/ Dexter Benoit

**BENOIT LAW FIRM, PLLC**

Dexter Benoit (NC Bar #41752)

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Suite 106

Charlotte, NC 28203

T: 877-600-7212

E: [dexter@benoitlawfirm.com](mailto:dexter@benoitlawfirm.com)

*Attorneys for Plaintiff*

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<b>I. (a) PLAINTIFFS</b>  Jane Doe, an individual  <b>(b)</b> County of Residence of First Listed Plaintiff <u>Cumberland</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small>  <b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number)  Dexter Benoit, Benoit Law Firm, 1514 S. Church St., Charlotte, NC 28203, 877.600.7212	<b>DEFENDANTS</b>  RED ROOF INNS, INC. et al.  County of Residence of First Listed Defendant _____ <small>(IN U.S. PLAINTIFF CASES ONLY)</small>  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.  Attorneys (If Known) _____
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<b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)																								
<input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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<b>IV. NATURE OF SUIT</b> (Place an "X" in One Box Only)						Click here for: Nature of Suit Code Descriptions.			
<b>CONTRACT</b>	<b>TORTS</b>	<b>FORFEITURE/PENALTY</b>	<b>BANKRUPTCY</b>	<b>INTELLECTUAL PROPERTY RIGHTS</b>	<b>OTHER STATUTES</b>				
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>LABOR</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

**V. ORIGIN** (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 U.S.C. Sec. 1595

Brief description of cause:  
Human trafficking, negligence, general and punitive damages

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.      **DEMAND \$** \_\_\_\_\_      CHECK YES only if demanded in complaint:  
**JURY DEMAND:**     Yes     No

**VIII. RELATED CASE(S) IF ANY** (See instructions):      JUDGE \_\_\_\_\_      DOCKET NUMBER \_\_\_\_\_

DATE: 11/14/2022      SIGNATURE OF ATTORNEY OF RECORD: Dexter Benoit

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_      AMOUNT \_\_\_\_\_      APPLYING IFP \_\_\_\_\_      JUDGE \_\_\_\_\_      MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.