



Leveraging Attorney General Offices' Varied Roles in Combating Labor Trafficking

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Labor trafficking or forced labor² occurs when an offender exploits the labor or services of an individual, often for personal or financial gain. Traffickers use individualized tactics to compel labor based on a victim's vulnerabilities and circumstances, which may include a combination of underhanded strategies ranging from intimidation and threats to physical violence. Labor trafficking can occur in any industry, illicit or legitimate, and is highly underreported, unidentified, and under investigated. Victims themselves often do not recognize their exploitation at all; and even when they do, may not understand it as criminal.³

While state Attorney General's Offices (AGOs) vary in size, jurisdiction, and organization, each can help improve their state responses to labor trafficking.

This resource provides strategies and examples of how each state and territory's AGO can leverage their leadership role to combat labor trafficking, including working with local prosecutors and a variety of state agencies. It will enable multiple stakeholders to evaluate local and state systems' policies and procedures to determine the most effective route to pursue prosecution of these offenses.

The Need to Improve Identification of Labor Trafficking Victims

There is no complete data set that reflects the prevalence of labor trafficking in the United States. There are some metrics that can help capture the scope of the problem, but even those do not account for labor trafficking that is unreported or unrecognized

by the victims. However, what information is available demonstrates the clear need to improve identification and prosecution of labor trafficking offenses. For example, in 2023 the National Human Trafficking Hotline collected just over 1,500 reports of labor trafficking (making up just under 20% of the reports they received that year).⁴ The Department of Labor has noticed a trend in the increase in reports of labor trafficking, noting that between 2019 and 2023, reports of child labor violations rose by 88%.⁵ In 2023, of the 192 civil suits filed alleging violations of the Trafficking Victims Protection Reauthorization Act, a little over 30% (61) alleged labor trafficking violations, either alone or in concert with a sex trafficking violation.⁶ Interestingly, 2023 saw a precipitous jump in TVPA allegations that involved both sex and labor trafficking, totaling 14 civil suits, outpacing previous high of 4 civil suits alleging violations of both sex and labor trafficking in 2022.⁷

In comparison to reports and civil litigation surrounding labor trafficking, prosecutions of these offenses are minimal. Of the 202 newly filed Federal Human Trafficking cases in 2023, only 5 were labor trafficking prosecutions (about 2%).⁸ While there are difficulties measuring state-level prosecutions due to a lack of consistent reporting between jurisdictions and a dearth of information on case dispositions, the most recent statistics from state participants in the Uniform Crime Reporting Program reported just 75 arrests for labor trafficking offenses in 2023.⁹ Though it is difficult to form an entirely clear picture of the deficit between reports of labor trafficking instances and their prosecution, the information that is available shows that the gap is significant.

A multitude of factors could be contributing to this deficit, but a major one is that labor trafficking is difficult to identify, investigate, and prosecute in part because there is no natural intersection between law enforcement and legitimate businesses. Law enforcement cannot, without probable cause that a crime is occurring, enter a business and conduct an inspection, interview employees, and demand employment records. Thus, law enforcement usually learns about labor trafficking through a victim disclosure after a victim has been connected to legal or victim services and established some level of safety. This means that many reports of labor trafficking are historical in nature,

making investigations more challenging, and often impossible to conduct proactively.

AGOs Roles and Responsibilities in Combating Labor Trafficking

Each of the 50 state, 5 territorial, and 1 district AGOs varies regarding the scope of their power, the organizational structure, and the variety of agencies which they oversee. While AGOs vary in size, jurisdiction, and organization, each can help improve their state responses to labor trafficking through any of the following:



Criminal Prosecution of Labor Trafficking

Questions to Ask Your AGO

What criminal jurisdictions does your AGO have?

- No criminal jurisdiction
- Original jurisdiction over all crimes
- Original jurisdiction over specific crimes
- Concurrent criminal jurisdiction with local prosecutors' offices
- Limited criminal jurisdiction
 - Upon the invitation of local prosecutor offices
 - Where a conflict exists

In states where the Attorney General independently investigates and prosecutes labor trafficking, they may take a center role by coordinating statewide law enforcement and connecting local law enforcement in various affected jurisdictions within the state. Where an AGO has criminal jurisdiction to prosecute labor trafficking, they are uniquely positioned to prosecute offenders who will often exploit individuals in multiple counties within a state. For example, trafficking may occur in rural areas where large farms or ranches span multiple counties, or a trafficker may have multiple businesses in multiple counties. In these cases, having a statewide prosecution entity is an advantage to ensure a comprehensive response to a large-scale or multi-pronged trafficking operation.

Example: Massachusetts AGO Prosecutes First Labor Trafficking Case¹⁰

In one of the first convictions secured by the Attorney General's Office in the Commonwealth of Massachusetts, Fernando Roland was found to have trafficked several women into working for his cleaning business. The Attorney General's Human Trafficking and Fair Labor divisions opened the investigation into Roland after a report from officials in Rhode Island.

The workplace violations included the defendant hiring two women who spoke no English and had recently arrived in the United States; the women were forced to work over 40 hours a week doing cleaning and household chores for the maintenance company the defendant worked for, while turning over their paychecks to the defendant for housing and transportation. The defendant held their passports, preventing them from leaving. One of the women was also physically threatened when she tried to leave.

In jurisdictions where AGOs have limited or concurrent¹¹ criminal jurisdiction, AGOs may offer support to local prosecutors as they are often better resourced and staffed to support a complex investigation. AGOs may also employ specialized prosecutors who can serve as a resource to local prosecutors, whether that be providing training and technical assistance or assisting in a local prosecution, sitting first or second chair to build capacity for other prosecutors, or

providing specialized assistance to local prosecutors handling human trafficking cases. In some states, the AGO may work closely with local prosecutors in a more supervisory role to varying degrees (such as in New Hampshire, which gives their AGO power to “control, direct and supervise criminal law enforcement by the county attorneys.”).¹²

Example: Rainbow Brite¹³

The Attorney General of California sought criminal charges against the Gamos family, who for over a decade engaged in a pattern of exploitation targeting Filipino immigrants to the United States; the defendants controlled their victims by using threats of deportation, false promises to assist with immigration, and confiscating their victim's passports to prevent them from leaving. The victims were forced to work in daycare facilities, where they were forced to work extended hours, and slept in garages on the floor at the direction of the defendants. Some employees reported being locked outside when the family was not home.

In obtaining this conviction, the Attorney General's Office worked closely with the San Mateo County District Attorney's Victims' Services Unit to provide services to the victims, a partnership which was crucial in maintaining victim engagement.

Generally, labor trafficking cases are time and resource intensive and require skillsets and tools that can support financial and digital investigations, the need for interpretation and translations services, support and advocacy on behalf of large numbers of victims, and coordination with multiple agencies that may span several jurisdictions. AGOs can support local prosecutors or take on cases that local prosecutors' office cannot to ensure that offenders are held accountable. In turn, AGOs benefit from working with local prosecutors, who can provide state-level prosecutors with insight into local courthouse practices as well as connecting victims to local community-based victim service organizations.

Civil Jurisdiction over Labor Trafficking

Questions to Ask Your AGO

What civil jurisdictions does your AGO have?

- No civil jurisdiction
- Only on the permission of the governor or other authority
- Broad discretion to open investigations and conduct civil suits against individuals and companies violating state labor and other regulations.

As with criminal authority, the civil authority of an AGO may differ significantly between offices; some may not have the authority to initiate an independent civil action without permission from the governor of the state, while others are given wide leeway to investigate civil wrongdoing within their jurisdiction at their discretion.¹⁴ As with criminal authority too, this is laid out in the individual state's constitution and subject to significant interpretation.

There are several ways in which an AGO may be involved in direct civil litigation surrounding a trafficking case. For example, the AGO is often the body tasked with defending a state law when challenged and may find themselves having to defend the wording and scope of their state's human trafficking or labor trafficking statute in a Circuit or Supreme Court proceeding. Civil proceedings initiated by an AGO may also involve asset forfeiture, which can be a crucial method of obtaining restitution for victims. Perhaps most importantly, AGOs can initiate civil cases against businesses and individuals who violate workers' civil rights, including wage theft and labor trafficking. States may also be able to use civil Racketeer Influenced and Corrupt Organizations Act (RICO) state statutes to address labor exploitation and trafficking.¹⁵ In such states, where the conduct of a labor trafficker also violates provisions of state RICO provisions, the AGO may play a critical role in helping make victims financially whole and obtain compensation for exploited labor by initiating a civil suit for restitution against the trafficker.

Example: Minnesota Dairy Farms¹⁶

In a case that began as a civil action that ultimately resulted in a criminal prosecution, the Attorney General's Office in Minnesota charged a man with trafficking victims to work on a dairy farm, overworking and underpaying employees, physically threatened them, and forced them to work under dangerous conditions, and without the proper safety certifications to do the jobs they were being ordered to do. The Stearns County Prosecuting Attorney referred the case to the office of the Attorney General to prosecute, after the office of the attorney general had already sued the farm under civil law for failure to pay wages and overtime, failure to keep records and falsifying records, and violations of state habitability laws.

The office of the Attorney General may also be responsible for maintaining and enforcing violations of licensing registration and requirements, another civil function that may put them in a position to fight labor trafficking. For example, in Pennsylvania, the Home Improvement Consumer Protection Act requires all contractors who perform at least \$5,000 worth of home improvements in a year register with the Attorney General's office.¹⁷ The Act also empowers the Attorney General to investigate and pursue violations of this registration requirement.¹⁸ By seeking charges against the professional license of a human trafficker, or at least ensuring that a license cannot be renewed, the AGO may be able to prevent the trafficker from exploiting another person in the same way.

Referrals of Suspected Labor Trafficking

Questions to Ask Your AGO

What types of complaints or reports might the AGO receive from various agency partners?

- Environmental complains
- Wage theft
- Licensing Violations
- Workplace safety complaints

Prosecutions of labor trafficking are often dependent on initial referrals from other agencies or organizations. AGOs are well-positioned to leverage their relationships with other state agencies to increase referrals of potential labor trafficking. Whether or not they directly oversee other state agencies, AGOs can help ensure that all state agencies with the responsibility of overseeing business and labor practices receive consistent training and directives around labor trafficking. AGOs can also lead initiatives to implement referral systems between various state agencies. Someone exploiting workers may not be checking licenses or certificates for operating heavy machinery at a construction site – it is significantly easier for this to be caught by a licensing board checking for licenses to operate a crane than for a detective to establish probable cause to investigate for human trafficking. If the trafficker is not paying their employees a legally fair wage (or no wage at all), they may be misrepresenting that on their tax forms for their business.

Regulatory agencies that interact with industries in which labor exploitation is common (such as domestic work, restaurant service, construction, and agricultural work¹⁹) may receive complaints of stolen wages, or uncover potential signs of labor trafficking during inspections that should be referred for criminal investigations. Complaints of human trafficking will often originate in regulatory complaints in these high-risk industries. For example, the EEOC (“Equal Employment Opportunity Commission”) investigated and ultimately obtained a settlement from Green Acre Farms and Valley Fruit Orchards, stemming from a case involving contracted workers who were brought to work on the farms on H-2A visas.²⁰ The workers had been recruited with the offer of high pay and steady employment, but had been forced to pay extremely high “recruitment fees” which created insurmountable debt, preventing the workers from being able to leave the farm.²¹ Their passports had been confiscated by their employers, and they were threatened with deportation. The power of regulatory agencies to empower victims to step forward and strike back at traffickers financially cannot be overlooked.

Many of these agencies also interact with populations at high risk of being trafficked, or venues that have a high risk of labor trafficking occurring within them.

The roles that such regulatory bodies can play are instrumental in conducting proactive investigations into potential labor trafficking, and AGOs are uniquely situated to create and facilitate partnerships between these agencies to share information and refer cases. In some jurisdictions, the AGO also plays a major role in defining the responsibilities of regulatory agencies within the state government when that role is up to interpretation by issuing legal opinions or providing official guidance.²² Depending on the jurisdiction, the AGO may advise regulatory agencies on policies to adopt. Regulatory agencies may be better poised to recognize recidivist offenders as well: some states like New York require that individuals convicted of labor trafficking offenses to surrender certain kinds of licenses.²³

Example: Hennepin County Construction Industry²⁴

In a state prosecution for labor trafficking, Ricardo Batres was found to have recruited men to work in his construction business by promising them wages, benefits, and housing. However, once the men arrived at the job site, they learned that they would be working ten to twelve hours a day, sometimes six days a week without being compensated for their overtime. They were not provided proper safety equipment, and several employees were injured while working at the job site. None of the injured employees received medical care, and many were forced to return to the job site while still injured.

The prosecution was brought after complaints made by a labor union, the Center for Workers United in Struggle (CTUL) and The Advocates for Human Rights. This report triggered an investigation by the Minnesota Commerce Fraud Bureau, which was reported to the office of the Attorney General.

State agencies not providing industry specific services may still intersect with individuals at a high risk for labor trafficking. Statistics from the National Human Trafficking Hotline in 2021, the last year for which the Hotline released detailed demographic breakdown, show that for labor exploitation, the highest risk factors included recent migration/relocation, mental or physical

health concerns, disability, and unstable housing.²⁵ Labor trafficking victims were also far more likely to be foreign nationals (with 71% of callers reporting that they were foreign nationals). Many of these victims reported being recruited initially over the internet, but several also reported being recruited from a housing shelter, off the street, or at a detention center.²⁶ State agencies working with potential victims in these vulnerable populations are also key points of contact that may end up receiving information that could form the basis of a report of labor trafficking.

Example: Labor Trafficking in the Illicit Cannabis Industry

Documented instances of illicit cannabis farms wreaking environmental havoc due to the improper use of regulated pesticides have been reported in multiple states, including California, Oregon, and Oklahoma.²⁷ Health hazards from pesticides have been documented in other individuals who have been linked to human trafficking in the legal agricultural industry as well.²⁸ Regulatory boards that control pesticide application and transportation, as well as water and energy control boards, may be in a position to know that a farm is engaging in unsafe worker practices and sound the alarm for investigators to collect evidence of what at minimum may be an environmental regulatory violation.

Multidisciplinary Partnerships to Combat Labor Trafficking

Questions to Ask Your AGO

What state agencies does the AGO oversee or partners with that would intersect with businesses, the labor force, or potential victims?

- Statewide law enforcement agency
- Department of Labor or Workforce Development
- State Revenue Service or Tax Board
- Consumer Protection
- Licensing Boards
- Health and Human Services
- Child Welfare Agencies

Questions to Ask Your AGO

What task forces is your AGO a part of that might have additional resources to share?

- Office for Victims of Crime (OVC), Enhanced Collaborative Model (ECM) Task
- FBI Human Trafficking Task Forces
- Federal partnerships

The statewide leadership role of any AGO can be invaluable when building a collaborative, multi-disciplinary response to labor trafficking. Combating labor trafficking requires collaboration between traditional law enforcement partners as well as non-traditional government and community partners. Building a coalition of varied partners can be challenging, especially when there are competing priorities. The AGO can set priorities and lead by example by ensuring that there are comprehensive and intentional collaborations focused on combating labor trafficking. This may include leading statewide coalitions or task forces focused on labor trafficking, hosting meetings, conferences, or training²⁹, or assisting in identifying and recruiting partners to collaborative on labor trafficking responses.

No matter which body is ultimately prosecuting a trafficker for their conduct, the office of the Attorney General is uniquely poised to bring together all the agencies and people who could contribute to that prosecution. The average local prosecutor might not have any relation with their local water control board, or department of fair housing, or food and safety administration – whereas especially in states where the AGO works closely to investigate licensing and regulatory complaints, they may have a different relationship with the individuals involved.

Most AGOs sit on some form of task force associated with human trafficking (roughly 80%, as reported in 2018).³⁰ However, most task forces focus their efforts on combating sex trafficking (the most common being the Internet Crimes Against Children Task Force). In 2010, OVC and Bureau of Justice Assistance (BJA) launched the ECM Program – but a study examining ECM efforts between 2015 and 2019 found that of the 10 ECM task forces interviewed, 90% focused primarily

on sex trafficking – with 96% of their investigations targeting sex trafficking operations, and only 3% targeted labor, even though service providers associated with those ECMs indicated that labor trafficking victims made up a significant portion of their client base.³¹ 99% of the subsequent prosecutions were focused on sex trafficking.³² The partnerships described here would help fill this gap.

Consider who needs to be at the table: who is interacting with populations at a high risk of being trafficked? Who is interacting with people who work in fields that have high rates of trafficking? These are the agencies that may be seeing things that will provide an “in” for law enforcement to examine a legal business, even if they may need additional training to recognize red flags, behaviors, or indicators for labor exploitation. Once these partners have been identified, the AGO can take on a major leadership role in making introductions, and maintaining a line of communication between them, so that they are able to share information – this may remain an informal exchange of information, but it could also involve something like establishing regular multidisciplinary team meetings to discuss reports, plan a range of proactive approaches and investigations, or discuss past cases to determine what lessons can be learned to improve responses to labor trafficking.

AGOs can also convene various law enforcement agencies, state agencies, and community organizations and convey updates and debriefs surrounding any active investigations. This is helpful given that any labor trafficking response requires coordination, collaboration, and communication. Case briefings are helpful at each stage of an investigation and prosecution as they help ensure that every investigative lead is followed, that victims are receiving necessary and appropriate services and resources, and that cases are reviewed and analyzed to identify gaps and promising practices.

Public Awareness and Education

Questions to Ask Your AGO

What spaces is your AGO most visible in to provide education to the public, and how can they use those spaces to improve access to justice for victims?

- Schools
- Town Halls
- Billboards
- Brochures
- Other information gathering centers

AGOs often support public service campaigns which are aimed at enhancing public safety and increasing the identification of victims. These campaigns also educate the general public (and potential jurors) about labor trafficking. In designing or approving these campaigns, the AGO can ensure that the reality of labor trafficking is portrayed and myths and misconceptions around are not perpetuated. AGOs can also provide training and specialized information to law enforcement, local prosecutors, judges, and even defense attorneys, to better be able to ensure that victims of trafficking do not fall through the cracks.

Example: Public Outreach in Utah

The AGO co-leads a statewide ECM Task Force. Utah has taken several steps to engage in targeted awareness campaigns and outreach across the state. The AGO runs the state human trafficking hotline³³ and maintains partnerships with agencies and organizations that are likely to encounter individuals who may be victims of human trafficking. For example, The Utah Trafficking in Persons Task force is a targeted partnership between the AGO and various regulatory agencies, community organizations, healthcare providers, academics, and law enforcement, designed to combat human trafficking within the state of Utah. Utah’s AGO also engages in general awareness campaigns designed to help the public protect their rights and providing proactive avenues for citizens to be involved in the fight against human trafficking.³⁴

Key Strategies for Leveraging AGO Partners:

Know what role your AGO has in improving your state response to human trafficking

Work with partners to identify victims

Leverage regulatory authority

Maintain lines of communication between key stakeholders

Engage in Public Outreach

ENDNOTES

- 1 Jane Anderson is a Senior Attorney Advisor with AEQUITAS and a former prosecutor from Miami-Dade County. Jennifer Newman is the Managing Editor of Legal Publications at AEQUITAS, and a former prosecutor from Philadelphia County.
- 2 “Labor trafficking” and “forced labor” are used interchangeably in this article and refer to federal and state criminal laws. Contact AEQUITAS for an analysis of your state’s labor trafficking statute.
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- 15 *See, e.g.,* ARIZ. REV. STAT. ANN. § 13-2314, DEL. CODE ANN. tit. 11, § 1505 (2025), 7 R.I. GEN. LAWS ANN. § 7-15-4 (1985).
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