Labor Trafficking in Construction and Hospitality

Final Report

Analyzing Victim Recruitment, Exploitation, and Service Needs to Identify Strategies for Prevention and Intervention

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Introduction and Problem Statement

Although law enforcement and community interest in human trafficking has increased tremendously since passage of the Trafficking Victims Protection Act in 2000, most anti-trafficking efforts by law enforcement and community-based organizations have focused on sex trafficking. Labor trafficking, when prioritized at all, is often conceptualized as a single phenomenon—the variation in industries in which labor trafficking occurs and the variation in victim experiences within these industries are sorely overlooked. The lack of sector-specific knowledge about labor trafficking victimization limits the extent to which law enforcement, regulatory agencies, health officials, and community-based advocates can identify and respond to this crime.

The objective of this study was to explore how the recruitment, control, concealment, and needs of labor trafficking victims vary across industries in two sectors: construction and hospitality.[1] The study included primary data collection in three states (Colorado, Illinois, and New York): interviews with experts (e.g., victim service providers, worker justice organizations, and immigration advocates), surveys of individuals who have experienced labor exploitation in these industries, and in-depth follow-up interviews with a subsample of survey respondents who indicated experiencing relatively high levels of abuse on the survey. These data were supplemented with federally prosecuted construction and hospitality labor trafficking cases to provide further insight into the networks and supply chains involved in these activities.

Labor Trafficking in the United States

Labor trafficking is a devastating crime that robs victims of their humanity and denies workers basic human rights. Industry-specific practices, the complexities of victim vulnerability, and cultural and structural barriers within traditional enforcement mechanisms reduce the effectiveness of law enforcement and other victim service agencies to identify and respond to victims of labor trafficking (Farrell et al., 2020). Despite identification challenges (Barrick et al., 2014; Brennan, 2005; Dank et al., 2021; Farrell et al., 2008, 2020; Farrell & Pfeffer, 2014), labor trafficking is known to occur in formal and informal industries within the United States. The National Human Trafficking Hotline (NHTH) reported 1,000 situations involving labor trafficking in 2021 alone, with most calls stemming from domestic servitude, agriculture, and construction (National Human Trafficking Hotline, 2022).

The limited extant research on labor trafficking suggests that exploitation processes and experiences vary widely across industries and victim profiles (Owen et al., 2015). Recruitment, victimization, and concealment tactics may differ from one industry to another. For example, some industries (e.g., hospitality) regularly rely on subcontracts to hire workers. In these industries, victims may be at particular risk because employers may not be able to verify how the subcontractor treats its workers. Although research on labor trafficking within specific sectors is limited, there is evidence that some industries are more conducive than others to labor abuses and exploitation.

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[1] We operationalized "hospitality" to include restaurants and bars and hotels, motels, and resorts. Note that the National Human Trafficking Hotline considers restaurants and bars to be a different industry than hotels, motels, and resorts.

Labor Exploitation and Abuse in Construction and Hospitality

As noted above, in 2021, the NHTH received reports of over 1,000 labor trafficking situations. The most common industries were domestic work (17%), agriculture (11%), construction (6%), restaurants/food service (6%), and hospitality (3%). Although there is a dearth of industry-specific labor trafficking research, two studies have found that workers in construction face more labor abuses— like restrictions of freedom; deceptions, lies, and intimidation; threats to physical integrity; hazardous working conditions; and wage theft—than those in other industries (Dank et al., 2021; Zhang et al., 2014). One recent study found that the lifetime prevalence of labor trafficking among construction workers in Houston was 22% (Barrick et al., 2024).

Other research on labor exploitation and abuse more broadly has found that construction is characterized by wage theft, employee misclassification, limited benefits, and poor working conditions (Galemba, 2023; Juravich et al., 2015; Torres et al., 2013). A systematic literature review on workplace mistreatment in hospitality identified several forms of abuse, including abusive supervision, bullying, sexual harassment, aggression, and ostracism (Zhou et al., 2021). Other research has found that labor abuse and exploitation are common in industries that employ vulnerable foreign workers who have temporary immigration status or are undocumented (Fussell, 2011; Gleeson, 2010; Juravich et al., 2015; Southern Poverty Law Center, 2014); these workers are commonly employed in construction and hospitality.

Yet, much of what is known about variations in labor trafficking across industries comes from cases that were reported to the NHTH[2] —Polaris (Polaris, 2017, March 1) developed a typology of human trafficking to describe the characteristics of victims, offenders, and methods of control that have been seen in labor trafficking situations in specific industries (see **Exhibit 1**). One common element across the industries we studied is the presence of complicated relationships between smugglers, recruiters, subcontractors, and labor brokers, which may make it difficult to identify which party is responsible. Recruitment practices in these industries rely on various types of fraudulent promises and misrepresentation and potentially involve recruitment or smuggling fees. Whereas victims in the construction industry were primarily men from Mexico and Central America, victims in restaurants and hospitality included both foreign national men and women, and some children in restaurants, from different regions of the world. Across industries, victims are primarily foreign nationals, including those who are undocumented or on H-2B and J-1 visas; some cases in construction and hospitality involved U.S. citizens. Although methods of control varied by industry, common elements include threats of deportation, blacklisting, or police involvement. The use of confinement and debt bondage was also identified in cases in the restaurant and hospitality industries.

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[2] It is important to note that the NHTH data include only cases that were reported to the hotline and are not representative of all human trafficking cases in the United States.

EXHIBIT 1.

Characteristics of Labor Trafficking Situations Reported to the NHTH, by Industry

Characteristic	Construction	Restaurants/Food Service	Hospitality
Overview	• Usually within small contracting businesses • Employers may misclassify workers as independent contractors	• Traffickers often take advantage of language barriers between workers and customers	• Most frequently involves housekeeping staff
Trafficker profile	• Complicated labor supply chains involving **direct employers, recruiters, contractors, and smugglers** makes identification of the responsible party difficult	• Links between **smugglers, recruiters, and management** are unclear and may be intentionally obfuscated to avoid detection • In some cases it is a single offender, and in others multiple people with different roles may collaborate	• Hotel management or **labor recruiter/broker that subcontracts** to provide hotel labor
Recruitment	• Occurs through formal job offers and misrepresented visa contracts • May involve illegal and exorbitant **recruitment fees**	• False promises and extremely high **smuggling fees**	• Job offers that misrepresent working conditions, wages, ability to leave the job, or other fraudulent promises
Victim profile	• Primarily men from Mexico and the Northern Triangle who are undocumented or have **H-2B visas** • Some cases involve U.S. citizens	• Foreign national men and women; nearly 20% involved minors • Many are undocumented or on **H-2B or J-1 visas**	• Primarily women and men from Jamaica, the Philippines, and India with **H-2B visas (less frequently, J-1 visas)** • Some cases involve U.S. citizens
Methods of control	• Wages are reduced or withheld • **Threats of deportation and blacklisting** • Verbal abuse, harassment, and denial of necessities	• May be **confined** to the restaurant or isolated in a nearby home—victims may be charged exorbitant rates for substandard living conditions, food, and transportation, which increase their **debt** • Lethal threats to families back home • **Threats of deportation and blacklisting**	• **Debt** bondage, withholding or confiscating payment • **Confinement** to hotel property and constant monitoring, fraudulent contracts, physical abuse, and sexual harassment • **Threats of deportation and police involvement**

Source: Adapted from Polaris (2017, March 1). *The typology of modern slavery: defining sex and labor trafficking in the United States.* https://polarisproject.org/resources/the-typology-of-modern-slavery-defining-sex-and-labor-trafficking-in-the-united-states/

Current Study

The limited existing research suggests that the nature of labor abuse, exploitation, and trafficking varies across industries. As such, strategies for the identification, disruption, and prevention of labor trafficking victimization may also need to be tailored to these specific contexts. Through surveys, interviews, and a review of federally prosecuted labor trafficking cases, this study deepens our understanding of how exploitation operates differently in distinct sectors, including variation in the supply chain structure, recruitment, control, and needs of labor trafficking victims. The results provide a framework for understanding the utility of building sector-specific strategies to address labor trafficking and identify potential points for focused identification and intervention efforts.

Study Design and Methods

Using a multi-method study, including surveys, interviews, and a review of federally prosecuted labor trafficking cases, we sought to address three primary research questions (see sidebar). We explored variation in labor abuses and exploitation in four communities that have robust construction and hospitality industries. These sites offered diversity regarding geography, sociodemographic composition, and seasonal employment.

Study Sites

Data collection took place in four sites across three states. Study sites were purposively selected to be geographically and demographically diverse and to represent three regions of the United States: New York (Northeast), Illinois (Midwest), and Colorado (West). Participating communities include two of the largest cities in the country (New York Metropolitan Area[3] and Chicago Metropolitan Area), one of the fastest growing U.S. cities (Denver, CO [U.S. Census Bureau, 2019]), and a winter tourist destination (Summit County, CO). **Exhibit 2** presents a profile of the population and employment characteristics of the study sites. The three metropolitan areas range in population from nearly 3 million to over 20 million and have racially and ethnically diverse populations and a large number of workers in construction (100,000 to nearly 400,000 per site) and hospitality (120,000 to over 500,000 per site). Summit County is small, with a total population of just over 30,000, and primarily white. However, it was selected for its seasonal tourism industry; over 30% of Summit County employees work in hospitality.

Research Questions
1 Does labor trafficking victimization manifest itself differently in distinct industries?
2 What is the underlying supply chain structure of labor trafficking in the construction and hospitality sectors? Who are the actors and agencies involved?
3 Are there points throughout the stages of recruitment, control, and concealment of labor trafficking in these industries that could present opportunities for identification and intervention?

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[3] We originally planned to focus only on Suffolk County; however, because we were unable to recruit a sufficient number of workers, we expanded the focus to all of the New York Metro area.

EXHIBIT 2.
Employment Profile of Study Sites

State:	Colorado		Illinois	New York
Study Site:	Summit County	Denver Metro Area	Chicago Metro Area	New York Metro Area
Population Characteristics				
Total population[a]	31,042	2,936,665	9,607,711	20,011,812
Median age (years)[a]	38.6	36.9	37.9	39.0
Racial composition (alone or in combination with one or more other races)[a]				
White	29,455	2,446,240	6,496,610	11,795,371
Black or African American	577	209,707	1,697,092	3,803,568
American Indian or Alaska Native	325	67,420	104,409	209,924
Asian	467	168,362	764,681	2,548,735
Native Hawaiian or Other Pacific Islander	132	10,968	12,301	35,416
Some other race	2,522	310,877	1,219,674	3,097,090
Ethnicity[a]				
Hispanic or Latino (of any race)	4,558	685,958	2,165,111	4,971,541
Citizenship[a]				
U.S. citizen	29,531 (95%)	2,748,375 (94%)	8,817,677 (92%)	17,576,322 (88%)
Not a U.S. citizen	1,511 (5%)	188,290 (6%)	790,034 (8%)	2,435,490 (12%)
Employment Characteristics				
Total number of employees, all sectors[b]	21,058	1,294,704	4,022,843	7,882,903
Number of employees, construction (NAICS 23)[b]	1,170	100,845	169,908	379,332
% employees in construction	6%	8%	8%	5%
Number of employees, hospitality (NAICS 72)[b]	6,563	121,716	332,868	560,270
% employees in hospitality	31%	9%	4%	7%

Note. NAICS = The North American Industry Classification System, the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.

[a] U.S. Census Bureau. (2021). *American Community Survey, 5-year estimates data profiles*. https://www.census.gov/data/developers/data-sets/acs-5year.html

[b] U.S. Census Bureau. (2021). *County business patterns, Table CBP2200CBP*. https://www.census.gov/programs-surveys/cbp.html

Data Collection

Data collection activities included reviewing federally adjudicated labor trafficking cases involving construction and hospitality and also conducting primary data collection in the study sites. The site-based data collection included expert interviews, surveys of individuals who experienced abuse or exploitation working in construction or hospitality, and follow-up interviews with a subset of survey respondents who reported experiencing relatively high levels of abuse.

Federally Adjudicated Labor Trafficking Cases

Supply chain tools are used to assess the vulnerabilities in supply chains, particularly to see how to cause catastrophic disruption.[4] (A supply chain disruption is any unexpected event that interrupts the normal flow of goods and services within a supply chain.) In a labor trafficking supply chain, people are the products being used against their will for a business purpose (Bhimani et al., 2024). In the analyses presented here, we provide two different supply chain modeling strategies to answer Research Question 2, on supply chain flow diagramming and social network modeling of the supply chain.

In a traditional supply chain context, one of the first steps to understanding supply chain vulnerability is collecting data and generating a supply chain flow diagram, which may help in creating a network view of the supply chain itself, including the locations of direct and indirect suppliers, manufacturing plants, distribution centers, and customers, as well as transportation routes and points of disruption risk. Such a diagram helps in visualizing the entire supply chain and identifying potential bottlenecks and vulnerabilities and in understanding the flow of materials and information. This holistic view allows for better risk assessment and mitigation strategies. Rather than map out the supply chain of products, we use a unique application of this approach to study the supply chain of human trafficking victims. That is, we use the lens of supply chain network disruption theory to understand how to disrupt the process traffickers use to recruit and eventually exploit workers. Thus, the elements of the supply chain that we consider include recruitment, location, housing, and exploitation within the process of labor trafficking.

In diagramming supply chain structure in labor trafficking operations in the hospitality and construction industries, we code specific states of the labor trafficking supply chain (e.g., recruitment, movement, housing). The flows across states in these models represent a victim's journey through the specific echelons of the supply chain. The arcs between echelons represent the movements of people, information, or finances across the supply chain, helping to pinpoint the optimal locations for disruption of the illicit flow (Mentzer et al., 2011).

A supply chain disruption can impair the network's ability to operate. A *catastrophic* supply chain disruption leads to an inability for a network to continue planned operations. Disruptions can arise from various sources, such as natural disasters, attacks, or infrastructure failures. Besides violent attacks, a supply chain disruption can also be inflicted through the imposition of actions or decisions by network entities, such as trade blockades, supplier changes, transportation interruptions, workforce adaptations, or other types of deliberate actions. The impact of a disruption may depend on the underlying structure of the supply chain and the identity of the agents who are involved in its operation over time. Labor trafficking cases that have been federally prosecuted or the subjects of civil lawsuits often result from detection by law enforcement, regulators, or other actors who can disrupt the supply chain.

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[4] Bhimani S. (2019). *How supply chains break.* Working paper.

Equally important to efforts to disrupt labor trafficking supply chains is understanding the actors and agencies that are involved in the supply chain structure and eventual disruption. Social network modeling approaches provide an opportunity to measure and visualize the interconnected groups in a diagram of the labor trafficking supply chain. Each actor plays a role in the network, and their interdependencies facilitate the supply chain. Understanding the network actors, their relationships, and the structure of their connections is essential to inform disruption efforts aimed at dismantling illicit supply chains. To answer the second part of Research Question 2, about the actors involved in the supply chain nodes, we calculate social network models where nodes represent the entities who take part in the supply chain. For our study of labor trafficking, these entities begin with the recruiters who solicit human labor; they are connected to the buying entities who pay for forced labor and the entities who use them thereafter.

We identified, coded, and diagrammed 4 construction and 4 hospitality cases (plus 1 case that included both hospitality and construction elements) from a sample of 72 identified labor trafficking cases that appeared in federal court records. The team obtained the sample by first identifying all U.S.-based construction and hospitality cases that were either prosecuted under labor trafficking laws or civilly adjudicated in federal court under the civil provisions of the Trafficking Victims Protection Act. Cases were drawn from a sample of labor trafficking case data from the Human Trafficking Legal Center's Federal Civil Trafficking Case Database, SHERLOC, and Westlaw. After generating the initial set of cases, we excluded any with missing public documents (complaint/indictment and docket). For the remaining cases, we gathered all related court documents and media publications. These items included data from Westlaw Edge, LexisNexis, and Public Access to Court Electronic Records (PACER), as well as news articles and other media sources identified via Google searches using keywords associated with the case. The process was repeated throughout the study period to capture the most recent reporting. Cases were selected to represent a variety of construction and hospitality venues, of different sizes and complexity, in different regions of the country. For each selected case, we coded the indictment, sentencing documentation, hearing information, and other associated documents that outline the elements of the labor trafficking crimes. **Exhibit 3** briefly describes the cases studied.

EXHIBIT 3.
Case Descriptions

Case Name	Industry Type	State	Type of Case	Size	Description
Adia v. Grandeur Management	Hospitality	New York	Civil	Medium	A Filipino worker on an H2B visa was fraudulently recruited for work in a hotel and resort. The victim was threatened with cancelled sponsorship if they exposed the exploitative work conditions.
Baxter v. Miscavige	Construction and Hospitality	Florida	Civil	Medium	Plaintiffs worked multiple jobs serving food, cleaning, cooking, landscaping, making repairs, and serving as stewards on vessels as part of the Church of Scientology Sea Org program.
Cotto v. Sutton	Construction	Virgin Islands	Civil	Small	Disaster relief work in the Virgin Islands involved the exploitation of U.S. workers who suffered discrimination and exploitative work.
Counsellor v. Manchanda	Hospitality	Florida	Civil	Small	Tenants of a hotel room became indebted to a hotel owner who exploited them for labor in the hotel.
U.S. v. Dan Zhong	Construction	New York	Criminal	Medium	Zhong's construction company hired Chinese national workers and brought them to the U.S. on A2 and G2 visas to perform construction work specifically and exclusively on diplomatic facilities for the People's Republic of China. Workers were exploited and threatened with deportation.
U.S. v. Edwards	Hospitality	South Carolina	Criminal	Small	An intellectually disabled man was recruited to work in a restaurant, where he was exploited for years.
Minnesota v. Batres	Construction	Minnesota	Criminal	Medium	The defendant recruited undocumented workers to work for his company doing carpentry, framing, and wallboard installation. He underpaid workers, placed them in crowded housing, and threatened them with deportation.

(continued)

Case Name	Industry Type	State	Type of Case	Size	Description
U.S. v. Beleal Garcia Gonzalez	Hospitality	Texas	Criminal	Medium	Defendants recruited 3 minors (ages 14, 15, and 17) from Honduras to work at a restaurant. The victims were forced to work at a bar, 10 hours a day, 6 days a week. Pay went to smuggling debt. Workers were told to have sex with customers for additional pay to relieve the debt.
David v. Signal International, LLC	Construction	Texas and Louisiana	Civil	Large	Defendants promised employment and green cards to hundreds of workers brought from India to work in shipyards after Hurricane Katrina. Workers suffered exploitative labor conditions and were held in servitude by false promises of green cards.

Expert Interviews

From January 2023 through January 2024, we interviewed 22 experts—various service providers, labor organizers and advocates, and other individuals with knowledge and professional expertise in labor abuse or in either the construction or hospitality industries across the four sites (see **Exhibit 4**). Interviewees were identified through existing contacts, internet searches, and referral by other interviewees.

The interviews focused on professional history, industry-specific community context (e.g., seasonal workforce, use of subcontractors and labor brokers, known labor abuses), community context and collaboration (e.g., vulnerable populations, prioritization of labor trafficking, collaboration with agencies to assist exploited individuals), labor exploitation, and trafficking cases. Interviews were conducted individually or in small groups, either in person or via Zoom, and lasted up to 60 minutes. With participant permission, interviews were audio-recorded and transcribed. If a participant declined the recording, detailed notes were taken instead.

EXHIBIT 4.
Expert Type

Expert Type	N
Worker organizing	5
Social services	4
Legal services	4
Labor union	2
Human trafficking services	1
Victim services	1
Immigrant services	1
Job development and training	1
Government	1
Other	2
Total	**22**

Worker Survey

From January 2023 through March 2024, we administered surveys to 476 workers who had experienced at least one form of labor abuse or exploitation in the construction or hospitality industries in the past 2 years. Because there is little research on labor trafficking among construction and hospitality workers and this study is exploratory, we used a variety of non-probability-based methods to identify workers who have experienced some form of labor exploitation. Our outreach efforts were convenient and purposive, resulting in a non-generalizable sample. We sent teams of field interviewers to intercept potential respondents at various public places where experts suggested the workers in their community may congregate (e.g., food pantries, shelters, places day laborers look for work, community events). We also asked our experts to share the survey opportunity with their clients by handing out business cards or posting flyers with information about the survey, posting a graphic with information about the survey on their social media platforms, or allowing the research team to introduce the survey at events they were already hosting (e.g., group meetings, community dinners).

Participants who were recruited in person were screened for eligibility by the field team (see sidebar) and presented options for taking the survey (1) immediately (either on a study tablet or their personal device) or (2) receiving a link to the take the survey later using their personal device. Participants who selected to take the survey immediately could either self-administer it or have the field team administer it by reading the questions verbatim and entering their responses on the tablet. Participants who learned about the survey through a flyer, business card, or social media post were provided a link to the survey and self-administered the screening and the survey items. These options were provided to maximize survey response. Survey respondents were provided a $30 gift card for participating in the study.

Eligibility Criteria

18
At least 18 years of age

Able to complete the survey in English, Spanish, or French

Worked in construction or hospitality in the past 24 months

Experienced at least one form of mistreatment, abuse, or exploitation (other than discrimination or harassment based on race, ethnicity, gender, or sexual orientation) while working in construction or hospitality

The survey instrument was adapted from a recent National Institute of Justice–funded study on labor trafficking among U.S. citizens (Dank et al., 2021) and included information in the following domains: respondent characteristics, family and occupation (e.g., marital status, educational attainment, jobs in the past year), housing, life experiences that may contribute to labor abuse and exploitation (e.g., violence, substance use, criminal legal system involvement), health and mental health conditions (e.g., depression, PTSD, intellectual disability), help-seeking, and a series of questions about experiences with different types of labor abuse and exploitation (see sidebar on next page). The survey included several items for each category of labor abuse and exploitation. Respondents were asked whether they had experienced each type of abuse in their lifetime and, if so, whether it happened in the past 12 months and how frequently it happened in the past 12 months. **Exhibit 5** presents the specific items in the survey that represent indicators for labor exploitation and labor trafficking.

Categories of Labor Abuse and Exploitation

Restrictions of physical and communicative freedom

Threats and abuses of a physical nature

Deception and lies

Threats and abuses of a sexual nature

Exploitative labor practices

Debt bondage

Intimidation, threats, and fear

EXHIBIT 5.

Indicators of Labor Exploitation and Labor Trafficking, by Category

Labor Exploitation	Labor Trafficking
Deception and lies	**Restrictions on freedom**
• Pay was less than you were promised	• You were forbidden from leaving the workplace
• The type of work was different from what you were promised	• You were restricted where you could go during non-working hours
• The work environment was different from what you were promised	• Your identification papers (such as passport, visa, or birth certification) were taken away
• The amount of work was different from what you were promised	• You were not allowed adequate food, water, or sleep for more than TWO days
• You were told that you will not be believed if you try to seek help from the police or other authorities	• You were prevented or restricted from communicating freely with other workers
• You were instructed to lie about your identity	• You were prevented or restricted from communicating freely with your family
• You were instructed to lie about the identity of your employer	• You were prevented or restricted from communicating freely with others outside the workplace
• Housing was different than what was described to you at recruitment	• You were not allowed to seek or receive medical services, including medication
• You have been instructed to lie to any other official	• You were not allowed to have visitors

(continued)

Labor Exploitation	Labor Trafficking
Exploitative labor practices	**Intimidation, threats, and fear**
• You were denied pay for work you performed in the United States • You received a bad check (bounced) from your employer • Your employer disappeared before paying you • You were paid less than minimum wage • You worked longer than 4 hours without a break • You worked longer than 8 hours a day without overtime pay (hourly employees only) • You worked on holidays without extra pay • You were told to work in hazardous environments (with unknown chemicals) without proper protection • You worked without medical insurance • You worked without workers comp insurance • You have been paid with things other than money, such as gift cards, tickets for goods, food, alcohol/drugs, housing/hotel room as a substitute to your wage • You have had any other work experience you consider abusive or exploitative	• You have been threatened by your employer or people who help your employer to behave or follow their orders or bad things would happen to you • Your employer or people who help your employer have ever told you "stories" of how bad things had happened to others who did not follow orders • You have been threatened by your employer or people who help your employer to behave or follow their orders or you would not be able to work anymore in this industry (blacklisted) • You have been belittled, humiliated, or put down by your employer or people who help your employer for not doing exactly what you were told • You have suffered "consequences" (e.g. docked pay or hours; verbal abuse; physical abuse) because you failed to follow an order from your employer or someone who helps your employer • You have been forbidden (or prevented from / or told not to) to socialize with outsiders (such as health workers, outreach workers, government inspectors, or union representatives)
Debt bondage	**Threats of abuses of a physical nature**
• You were charged fees or overcharged for goods/services you purchased from your employer (i.e., it would have been cheaper to purchase the good/services somewhere else) • You were told that the work you did is worth less than it is actually worth, which means you have to work more hours than you should in order to pay off a debt • You were charged excessive interest on a loan to repay your employer for pay advances or goods/services they previously purchased for you • Someone tried to reduce your pay by charging you excessive fees or overcharging you for things such as rent, food, broken items, or other items • Someone tried to reduce your pay by cutting down the hours you could work	• Physical abuse (including beating, kicking, slapping, etc.) • Threats of physical abuse (including beating, kicking, slapping, etc.) • Kept in an enclosed environment where you could not leave (including physically restrained) • Threats of harm to you in any other form • Threats of harm to your family or pet in any form • Threats to call the police on you • Threats to your family • Threats to deny you food • Threats to harm your co-workers • Physical harm in any form when you tried to leave, complain, report, or seek help for your situation • Your employer, or someone working with your employer, has ever threatened you in any manner (such as verbal threats) when you tried to leave, complain, report, or seek help for your situation

Labor Exploitation	Labor Trafficking
Abuses of a sexual nature	**Abuses of a sexual nature**
• Sexist work environment (sexist jokes, derogatory comments about people based on gender, calendars or photos of nude women or men)	• Unwanted touching or physical contact of a sexual nature • Verbal harassment of a sexual nature • Any unwanted sexual advances • You were encouraged or pressured to do sexual acts or have sex, including taking sexual photos or videos • Someone threatened to show explicit photos or videos to others or post on social media • You were forced to do something sexually you did not feel comfortable doing • You were forced to engage in sexual acts with family, friends, or business associates for money or favors • You were forced to trade sex for money, shelter, food or anything else through online websites, escort services, street prostitution, informal arrangements, brothels, fake massage businesses or strip clubs

Adapted from Dank, M., Farrell, A., Zhang, S., Hughes, A., Abeyta, S. Fanarraga, I., Burke, C. P., & Ortiz Solis, V. (2021, September). *An exploratory study of labor trafficking among U.S. citizen victims* (NCJ No. 302157). https://www.ojp.gov/ncjrs/virtual-library/abstracts/exploratory-study-labor-trafficking-among-us-citizen-victims

Characteristics of the participants, by industry, are presented in **Exhibit 6**. Just over half (56%) of the sample reported having worked in construction in the past 12 months; 39% had worked in restaurants, bars, and food service; 25% had worked in hotels, motels, and resorts; and 19% reported having worked in other industries (participants may have worked in multiple jobs during this period, so the percentages do not sum to 100%). Participants were 17–72 years old,[5] with a mean of 37 years. The mean age was similar across industries, ranging from 36 to 39 years old. Most participants identified as male (70%), 27% identified as female, and about 3% identified as transgender, nonbinary, or gender nonconforming. Whereas most construction workers identified as male (92%), equal percentages of hospitality workers identified as male (48%) and as female (48%). Most participants identified as being Latinx (82% overall; 86% and 75%, respectively, for construction and hospitality) and as speaking primarily Spanish at home (81% overall; 86% and 73%, respectively, for construction and hospitality). About one-third of the sample were undocumented (32%), 29% were U.S. citizens or legal permanent residents, 23% had refugee or asylee status,[6] and 7% were in the United States on a J-1 cultural exchange visa. Nearly twice as many hospitality workers (38%) as construction workers (20%) were U.S. citizens or legal permanent residents.

[5] During screening, potential participants were asked if they were at least 18 years old. One respondent passed the screening and later entered their age as 17.

[6] The question was intended to capture those who had the status in hand, and there was a response option for "applied or waiting" on any of the immigration statuses. However, respondents may not have felt comfortable selecting that option.

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EXHIBIT 6.
Characteristics of Study Participants, by Industry

Characteristic	Total Sample N (%)	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Total	**476 (100)**	**264 (100)**	**252 (100)**	**184 (100)**	**117 (100)**
Jobs worked in past 12 months					
Construction	264 (55.5)	264 (100.0)	48 (19.0)	46 (25.0)	9 (7.7)
Restaurant, bars, and food service	184 (38.7)	46 (17.4)	184 (73.0)	184 (100.0)	49 (41.9)
Hotels, motels, and resorts	117 (24.6)	9 (3.4)	117 (46.4)	49 (26.6)	117 (100.0)
Other	88 (18.5)	51 (19.3)	46 (18.3)	37 (20.1)	18 (15.4)
Age					
17–25	105 (22.4)	50 (19.2)	63 (25.3)	57 (31.3)	19 (16.4)
26–35	148 (31.6)	95 (36.5)	71 (28.5)	48 (26.4)	37 (31.9)
36–45	101 (21.5)	61 (23.5)	49 (19.7)	32 (17.6)	25 (21.6)
46–72	115 (24.5)	54 (20.8)	66 (26.5)	45 (24.7)	35 (30.2)
Mean age	36.9	36.5	36.8	35.6	38.8
Gender					
Male	335 (70.4)	244 (92.4)	120 (47.6)	92 (50.0)	49 (41.9)
Female	127 (26.7)	12 (4.5)	120 (47.6)	80 (43.5)	64 (54.7)
Transgender (F–M)	1 (0.2)	1 (0.4)	1 (0.4)	1 (0.5)	1 (0.9)
Transgender (nonbinary)	1 (0.2)	1 (0.4)	1 (0.4)	1 (0.5)	1 (0.9)
Gender nonconforming	11 (2.3)	5 (1.9)	9 (3.6)	9 (4.9)	2 (1.7)
Other	1 (0.2)	1 (0.4)	1 (0.4)	1 (0.5)	0
Race and ethnicity					
Black or African American only	59 (12.4)	25 (9.5)	44 (17.5)	34 (18.5)	19 (16.2)
Asian/Pacific Islander only	2 (0.4)	1 (0.4)	2 (0.8)	2 (1.1)	2 (1.7)
Latino/a only	387 (81.5)	225 (85.6)	189 (75.0)	134 (72.8)	89 (76.1)
Caucasian only	13 (2.7)	4 (1.5)	9 (3.6)	8 (4.3)	3 (2.6)
Multiple racial/ethnic groups	11 (2.3)	6 (2.3)	6 (2.4)	5 (2.7)	3 (2.6)
Other	3 (0.6)	2 (0.8)	2 (0.8)	1 (0.5)	1 (0.9)

(continued)

Characteristic	Total Sample N (%)	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Primary language spoken at home					
English	84 (17.6)	32 (12.1)	63 (25.0)	49 (26.6)	31 (26.5)
Spanish	383 (80.5)	226 (85.6)	184 (73.0)	131 (71.2)	84 (71.8)
Other	9 (1.9)	6 (2.3)	5 (2.0)	4 (2.2)	2 (1.7)
Immigration status					
U.S. Citizen or legal permanent resident	112 (28.7)	45 (20.4)	80 (38.8)	58 (37.7)	36 (39.6)
H-2B	2 (0.5)	0	2 (1.0)	1 (0.6)	2 (2.2)
Other work visa	4 (1.0)	1 (0.5)	3 (1.5)	1 (0.6)	2 (2.2)
J-1	28 (7.2)	1 (0.5)	28 (13.6)	27 (17.5)	11 (12.1)
Other non-work visa	6 (1.5)	1 (0.5)	5 (2.4)	4 (2.6)	1 (1.1)
Refugee or asylee	90 (23.1)	76 (34.4)	27 (13.1)	24 (15.6)	5 (5.5)
Applied or waiting for any status above	25 (6.4)	15 (6.8)	14 (6.8)	12 (7.8)	3 (3.3)
None of the above (i.e., undocumented)	123 (31.5)	82 (37.1)	47 (22.8)	27 (17.5)	31 (34.1)
Relationship status					
Single	299 (62.8)	162 (61.4)	160 (63.5)	121 (65.8)	70 (59.8)
Married	93 (19.5)	59 (22.3)	45 (17.9)	31 (16.8)	21 (17.9)
Living together	48 (10.1)	28 (10.6)	25 (9.9)	18 (9.8)	10 (8.5)
Widowed	8 (1.7)	3 (1.1)	5 (2.0)	2 (1.1)	4 (3.4)
Divorced	17 (3.6)	5 (1.9)	12 (4.8)	8 (4.3)	10 (8.5)
Separated	11 (2.3)	7 (2.7)	5 (2.0)	4 (2.2)	2 (1.7)
Children					
Yes	304 (64.1)	191 (72.6)	139 (55.4)	100 (54.6)	65 (56.0)
No	170 (35.9)	72 (27.4)	112 (44.6)	83 (45.4)	51 (44.0)

(continued)

Characteristic	Total Sample N (%)	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Highest level of education completed					
Elementary (Kindergarten–5th grade)	72 (15.2)	47 (17.9)	27 (10.7)	15 (8.2)	13 (11.1)
Middle school (6th–8th grade)	106 (22.3)	74 (28.1)	41 (16.3)	30 (16.3)	19 (16.2)
High school (9th–12th grade)	132 (27.8)	73 (27.8)	71 (28.2)	53 (28.8)	32 (27.4)
Some college	88 (18.5)	34 (12.9)	62 (24.6)	48 (26.1)	26 (22.2)
Associate's degree	25 (5.3)	16 (6.1)	16 (6.3)	14 (7.6)	8 (6.8)
Bachelor's degree	36 (7.6)	12 (4.6)	25 (9.9)	21 (11.4)	11 (9.4)
Master's degree	3 (0.6)	0	3 (1.2)	2 (1.1)	2 (1.7)
No formal education	13 (2.7)	7 (2.7)	7 (2.8)	1 (0.5)	6 (5.1)

Worker Interviews

At the end of the survey, respondents were allowed to opt in to future contact by the research team if they were interested in participating in a follow-up interview. Because the goal of the interview was to capture the respondents' unique experiences of recruitment and exploitation and to understand the stages and potential exit points, only individuals who reported experiencing at least 10 forms of labor abuse or exploitation were considered eligible for the interview. This selection criterion, modeled after Dank et al. (2021), was intended to focus on workers who had faced more types of abuse; however, it was not intended to determine whether someone had experienced labor trafficking or not. In total, we conducted 20 follow-up interviews across the sites (see **Exhibit 7**).

EXHIBIT 7.
Worker Interview Characteristics

Characteristic	N
Language	
English	6
Spanish	14
Industry	
Construction	12
Hospitality	6
Both	2
Total	**20**

Data Analysis

Data analysis included supply chain diagramming of federally adjudicated labor trafficking cases, qualitative analysis of interview data, and quantitative analysis of survey data.

Supply Chain Diagramming

The research team members worked together to map the case data onto a supply chain structure template. During this process, the team created a shared understanding of the case data and developed a protocol for diagramming case data components to supply chain components. The protocol was then used to ensure consistency in diagramming the remaining cases to develop an evolving supply chain template structure. Two coders were assigned to most cases. Any discrepancies in coding were collectively addressed through a coding deconfliction process.

Across the 9 cases, we coded 1,342 distinct people who are associated with 5,721 relationships. Relationships were identified between *people and people* and between *people and places*. For people, we were able to capture information about the type of people associated with each case, including exploiter, victim, corporate internal actor, corporate external actor, other internal actors, and others. We also coded information about 261 discrete locations and were able to connect individuals with locations and aspects of the labor trafficking operation. For each person, relationship, and location, we coded information about the echelon in the network where that information was located. The coding protocol captured detailed information about recruitment, movement and exploitation processes, actual and potential disruptions, outcomes, and exchanges of money.

Although federally charged labor trafficking cases in these two industries are not fully representative of all labor trafficking occurring in these venues, identified cases provide a unique opportunity to outline the network structures of these types of offenses. Additionally, federally prosecuted case data provide an opportunity to identify the ways that labor trafficking is identified and disrupted within construction and hospitality venues.

Qualitative Analysis of Interview Data

We transcribed all qualitative interviews using Trint, an AI transcription software, followed by a complete quality check of the AI-generated transcript by a member of the research team. For worker interviews conducted in Spanish, we used a two-stage transcription and translation process in Trint. First, we used Trint to generate a transcript of the original interview conducted in Spanish. A Spanish-speaking interviewer on our team quality checked this transcript. Next, we used Trint to translate that corrected Spanish transcript into English. The same interviewer reviewed the translation for quality and accuracy.

To conduct qualitative analysis of both expert and worker interviews, we used the two-stage, flexible, in-depth coding method (Deterding & Waters, 2021). We used NVivo, a qualitative data analysis software, to manage, categorize, and ultimately apply thematic codes to interview transcripts. In the first stage of data analysis, we *indexed* all transcripts using a number of descriptive codes. The purpose of indexing transcripts is to capture all interview content in a small number of codes that the analysis team can then use for additional, more analytical coding. In the second stage, we used a smaller subset of our index codes to do additional analytical coding, focused on breaking down subthemes that corresponded to each research question.

Quantitative Analysis of Survey Data

Descriptive Statistics

Data analysis was performed using SAS 9.4 and included descriptive statistics (i.e., percentages and means). Results are shown for the overall sample and separately by labor industry. Because survey participants could have indicated that they worked in multiple types of industries, logistic regression models were used and contrasts were specified using Wald chi-squared tests to determine statistical significance between (1) individuals who had worked in construction and individuals working in any hospitality role and (2) individuals who had worked at a restaurant, bar, or food service and individuals who had worked in a hotel, motel, or resort. The logistic regression model included binary indicators of the two types of industries compared and the interaction term of the indicators.

Network Analyses

To determine the differences between overall experiences of exploitative labor practices across different industries, sites, and employee characteristics, we have constructed a series of association networks to observe the interrelated nature of exploitation experiences. Networks—a technique growing in popularity—are increasingly used to measure a number of social science issues such as offending (Boduszek et al., 2021), victimization (de Vries et al., 2022), and mental health (Xia & Ma, 2023). Within experiential network analyses, nodes are the phenomenon being studied; they are connected to one another through their co-occurrence in a given person. Here, disparate labor exploitation types are individual nodes that share a relationship when a single participant's survey responses indicate that they have experienced both.

For the point of comparison, we delineated our networks by industry. We specifically have a network for the overall study sample, the major study industries (construction, restaurants, hotels, and hospitality—a combination of restaurants and hotels). To create the networks, we constructed tetrachoric correlation matrices for the dichotomous exploitation measures from which the networks were made. There has been a significant volume of discourse within network studies regarding the best techniques for determining a cutoff for edge weights. One common method used is regularization, a technique that works well when the numbers of covariates and observations approach equal values—but has problems with estimations of standard errors in more low-dimensional space and potentially harm sensitivity (Borsboom et al., 2021). Another method would be to keep all tetrachoric correlations that are significant; however, this approach retains the opposite problem of conveying relationships that are not practically meaningful, therefore reducing specificity. Here, we opted to maintain correlations of a specific threshold (at least 0.35) in order to reduce the number of relationships that are not meaningful while also not removing meaningful relationships through penalizing regularization algorithms.

As tetrachoric correlations are more sensitive than Pearson correlations, we additionally elected to keep only items with at least 5% variation—in other words, every variable included needed at least 5% of responses in each category. In total, this cuts the number of exploitation types down from 61 to 49. The forms of exploitation removed during this process were substantively centered around sexual victimization and threats of deprivation and harm.

Our point of comparison for each of the networks is on basic network descriptives such as density (the number of edges divided by the number of all possible edges), the average edge weight, and then comparisons on each of the primary centrality measures (i.e., degree, betweenness, closeness, and eigenvector). Each of these centrality measures captures differing conceptual complexities of each individual node's relationship to the broader network structure. *Degree centrality* is straightforward, being the number of unique edges a given node has. Analogizing this term to more intuitive social networks, it is a person's number of friends. *Betweenness* is the bridging centrality measure and represents how often a node lies along the shortest path between two other nodes. It can be thought of as how often a person connects with two other people or how frequently a person can be considered a mutual friend. *Closeness* is the average distance a node has from all other nodes, or how close one person is to all other people in the network. The final centrality measure, *eigenvector centrality*, takes into account both the quantity and quality of connections. It can be thought of as higher scores assigned to those who have the most friends.

Reflection Sessions With Experts

After we concluded the survey and interview analysis and organized preliminary study findings, we held a reflection session with six experts from the study sites. This session was intended to member-check preliminary findings with study participants, and we discussed whether these findings resonated with or differed from their experience in the field. Session participants also considered the most important study findings to share with various community groups and the most effective ways of doing so.

Findings

Although this study was focused on labor trafficking, it is important to note that labor exploitation, abuse, and trafficking exist on a continuum. Labor trafficking cannot be understood or addressed in a vacuum—it is critically important to consider the broad spectrum of labor violations, including those that do not meet the threshold for trafficking (Pfeffer et al., 2023). Our primary data collection activities (i.e., survey of workers and interviews with experts and workers) captured information on a range of labor abuses (as discussed in the survey instrumentation and **Exhibit 5**). As such, it is important to note that the findings presented regarding Research Questions 1 and 3 reflect the continuum of exploitation. Each discrete type of abuse discussed does not necessarily constitute labor trafficking; however, understanding how labor exploitation occurs in different industries is needed to inform prevention, identification, and intervention efforts. The findings for Research Question 2, which was addressed through a review of federally adjudicated labor trafficking cases, speak more directly to labor trafficking.

Research Question 1: **Does labor trafficking victimization manifest itself differently in distinct industries?**

We first explored the survey data to assess whether workers' experiences of each type of labor abuse and exploitation varied by their industry. We compared experiences between construction and hospitality as well as within hospitality (i.e., restaurants/bars compared with hotels/motels). We assessed both (1) whether a respondent had experienced any abuse in each exploitation and abuse category and (2) how many types of abuse they experienced in each category. As shown in **Exhibit 8**, two categories of labor abuse were ubiquitous, regardless of industry: (1) deception and lies and (2) exploitative labor practices were experienced by nearly all workers. However, some differences also emerged. For example, restrictions on freedom of communication or movement; intimidation, threats, and fear; and abuses of a sexual nature were experienced by a significantly higher percentage of respondents who worked in hospitality than by those who worked in construction. Among hospitality workers, restrictions of freedom were more common among workers in hotels and motels than those in restaurants and bars; debt bondage was more common among restaurant and bar workers. There were no significant differences in the number of abuse types that respondents experienced (data not shown).

EXHIBIT 8.
Overview of Lifetime Experiences of Labor Abuse and Exploitation, by Industry

Experience	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Total	**264 (100.0%)**	**252 (100.0%)**	**184 (100.0%)**	**117 (100.0%)**
Restrictions on freedom[a,b]	121 (45.8%)	152 (60.3%)	101 (54.9%)	75 (64.1%)
Deception and lies	239 (90.5%)	235 (93.3%)	171 (92.9%)	111 (94.9%)
Exploitative labor practices	244 (92.4%)	233 (92.5%)	171 (92.9%)	106 (90.6%)
Intimidation, threats, and fear[a]	115 (43.6%)	161 (63.9%)	111 (60.3%)	78 (66.7%)
Threats of abuses of a physical nature	77 (29.2%)	72 (28.6%)	54 (29.3%)	29 (24.8%)
Abuses of a sexual nature[a]	45 (17.0%)	69 (27.4%)	53 (28.8%)	27 (23.1%)
Debt bondage[b]	114 (43.2%)	119 (47.2%)	95 (51.6%)	50 (42.7%)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

We also explored variation among the individual indicators within each category of labor abuse and exploitation (**Exhibits 9–15**). Both similarities and differences emerged in the specific types of these abuses that were reported by workers in each industry. Interviews with experts and workers provided additional context around how various forms of abuse manifest in different industries. The results are organized by the categories of exploitation included in the survey.

Restrictions on Freedom

Although hospitality workers were significantly more likely than construction workers to experience restrictions on freedom of communication and movement generally, the nature of those restrictions varied by industry. For example, significantly more construction workers than hospitality workers reported having their identification papers taken (8% and 4%, respectively); not being allowed adequate food, water, or sleep (14% and 6%); and not being allowed to seek medical care or medication (13% and 8%). These types of experiences were also reported by construction workers in the interviews. One interviewee described how workers were restricted in their ability to eat and hydrate regularly or as needed:

> *Sometimes it's driving, sometimes he'll complain about little things, like if we're hungry or thirsty. And [inaudible] says we take too much breaks. And after we get the job done, we're able to drink some water or be able to take lunch. He always wanted to see the job done before we do anything.* (Construction Worker, New York)

Another interviewee explained the impact of having their documents confiscated:

> *They took all our stuff. They took all our, they took our things, our passports and everything. We had to get copies of that and original. And then they took that. We was threatened not to go nowhere. We couldn't even go nowhere; we can't even be ourselves. We didn't have no way out. We couldn't even be ourselves. We was stuck. We was threatened and we were stuck, we couldn't be ourselves. They put so much emphasis on it. If this happens, you're going to get this. This going to happen to you. This—you ain't going to get to be your ID, you ain't going to do this. You ain't going to do that. They intimidated the mess out of us with threats and threats and threats. So we were stuck. Emotionally, mentally, and physically. It was just stuck. You know, we had to adhere to them people. Yeah, and only thing that kept us emotionally decent is our families. That was the encouragement we got. We had to stick this out, you know? That was not right. (Construction Worker, Chicago)*

EXHIBIT 9.
Restrictions on Freedom, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
You were forbidden from leaving the workplace[a,b]	41 (15.9)	69 (28.0)	41 (22.9)	38 (33.0)
You were restricted where you could go during non-working hours	36 (14.6)	46 (18.6)	32 (17.7)	23 (20.2)
Your identification papers (such as passport, visa, or birth certification) were taken away[a]	20 (8.1)	10 (4.0)	7 (3.9)	4 (3.5)
You were not allowed adequate food, water, or sleep for more than TWO days[a]	35 (14.3)	15 (6.1)	12 (6.7)	5 (4.4)
You were prevented or restricted from communicating freely with other workers[a,b]	57 (23.1)	88 (35.6)	55 (30.4)	46 (40.4)
You were prevented or restricted from communicating freely with your family	24 (9.8)	26 (10.6)	21 (11.7)	10 (8.8)
You were prevented or restricted from communicating freely with others outside the workplace	23 (9.5)	31 (12.7)	22 (12.3)	14 (12.4)
You were not allowed to seek or receive medical services, including medication[a]	32 (13.1)	20 (8.1)	14 (7.8)	8 (7.0)
You were not allowed to have visitors[a,b]	24 (10.0)	43 (17.6)	37 (20.7)	15 (13.2)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Deception and Lies

Although nearly all study participants were deceived or lied to, receiving pay less than promised (79%) and being told they would not be believed if they sought help (30%) were significantly more common among construction workers than hospitality workers (64% and 20% for these practices, respectively). There were also differences within hospitality such that restaurant workers' experience of deception and lies is more similar to that of construction workers: respondents with restaurant and bar experience (71%) were significantly more likely than those with hotel experience (55%) to be paid less than promised and be told they would not be believed if they sought help (24% and 14% for these types of hospitality workers, respectively). However, most types of deceit were experienced similarly by respondents regardless of industry experience. Experts and workers reported employers' lying to workers about what their job would be, often recruiting or otherwise convincing workers to travel to worksites that never materialized or for jobs that were not what they were promised. This practice was mentioned in both construction and hospitality industry jobs. An expert described such a scenario:

> *And certainly some restaurants even recently—kind of a slash between the, we don't know whether it's labor trafficking or not—but something recently where people have been told to come out here [to New York] to work for a very successful restaurant group in Miami, come out here to work in May, not know anything about the area, and then promptly fire them and kick them out of their housing at the same time. So they are driving back to Florida. For a while they were living in their car in Sag Harbor because this... had just happened.* (Expert, New York)

As a worker described it: *"I'm thinking they're helping me to get a job. They, I wonder [why] they didn't require all that. They made it sound so great and it was a flop. Everything was just a straight up flop and a lie."* (Construction Worker, Chicago)

EXHIBIT 10.
Deception and Lies, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Pay was less than you were promised[a,b]	204 (79.4)	158 (64.2)	127 (70.6)	63 (54.8)
The type of work was different from what you were promised	155 (63.8)	145 (59.4)	109 (60.6)	64 (56.6)
The work environment was different from what you were promised	137 (56.6)	146 (59.3)	107 (59.1)	71 (62.3)
The amount of work was different from what you were promised	175 (72.3)	168 (68.3)	128 (70.7)	78 (68.4)
You were told that you will not be believed if you try to seek help from the police or other authorities[a,b]	73 (30.4)	50 (20.4)	43 (23.9)	16 (14.0)
You were instructed to lie about your identity	35 (14.6)	25 (10.2)	22 (12.2)	7 (6.1)
You were instructed to lie about the identity of your employer	23 (9.7)	17 (6.9)	15 (8.4)	4 (3.5)
Housing was different than what was described to you at recruitment	19 (8.0)	29 (11.9)	25 (14.1)	13 (11.3)
You have ever been instructed to lie to any other official	15 (6.3)	15 (6.2)	13 (7.4)	5 (4.3)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Exploitative Labor Practices

Although exploitative labor practices were reported by nearly all respondents, most of the specific types (as outlined in **Exhibit 5**) were more common among construction workers than hospitality workers (see sidebar). The interviews provided examples of construction workers who had experienced an employer's or subcontractor's disappearing before paying a final payment, refusing to pay workers because they themselves had not been paid for a construction job, paying a lesser amount later than promised, or paying the same amount for more work than was promised (underpayment). As one expert reported, *"That's the scenario that I probably see the most often, is where they just don't pay that last check. And so they get them to work the job. Once the job's done, then the employer disappears and they don't get paid [for] their last little bit of work."* (Expert, Denver)

Types of exploitative labor practices that are more common among construction workers

Denied pay for work performed

Received a bad check

Employer disappeared before paying

Paid less than minimum wage

Worked over 8 hours without overtime

Worked holidays without extra pay

Worked in hazardous environments without proper protective gear

Worked without medical insurance or workers compensation

Paid with nonmonetary items

Although a higher percentage of surveyed construction workers (71%) than hospitality workers (46%) reported not receiving overtime, interviewees described scenarios in which hospitality workers were not paid overtime and did not receive their full tips. Interviewees also reported that workers in both construction and hospitality jobs were expected to work long hours without taking any breaks, were not allowed to take or were discouraged from taking breaks by employers, or were not receiving paid breaks that they were legally entitled to receive. As one worker explained, *"No, she wasn't giving us a break. She never voluntarily said, 'Well, take 5 minutes and have something to eat, girls.' No, nothing. No. Otherwise, we had to punch out, and she wouldn't pay us for those hours we were going to punch out"* (Hospitality Worker, New York). Others described situations of workers who were punished with a reduction in pay for being even in a few minutes late. For example,

> *If you arrive after 10:05 they will take $10 from me. If I arrive at 10:30, they take $20 from me. And if I get to 11:00, he doesn't pay for our shift. And if I arrive again at 10:06 he says no, he doesn't want to listen, I wasn't going to hear anything and he had already arrived, he took $10 from me, for a minute late, for a minute! I was running to get there, but as I said, on weekends the train gets too heavy.... Sometimes the trip takes me up to an hour to get to the bar. (Hospitality Worker, New York)*

Another described dangerous working conditions and the need to seek medical attention for an on-the-job injury:

> *That was one day that I had cut my hand and I was bleeding—oh, I actually cut my head. My head was bleeding nonstop. And I asked him if I could go get medical attention, and he said no. And I left my ID and my medical insurance card in his car, but he was just beating around the bush to drop it off. So he was just giving me like the runaround. And he's [inaudible] "Just wait here" and I wait there all day, still hasn't showed up. I did it for about 3 days. He promised me that the other location that he was going to come, and he's talking about he's busy [inaudible] work and just keeps going down the list. So I had to find a way to patch up my own self or home remedy and desperate for other options. (Construction Worker, New York)*

EXHIBIT 11.
Exploitative Labor Practices, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
You were denied pay for work you performed in the United States[a,b]	139 (54.7)	69 (28.4)	60 (34.1)	18 (15.8)
You received a bad check (bounced) from your employer[a]	51 (21.3)	34 (14.1)	26 (14.9)	18 (15.9)
Your employer disappeared before paying you[a,b]	128 (53.3)	42 (17.5)	36 (20.6)	13 (11.6)
You were paid less than minimum wage[a,b]	166 (69.5)	111 (46.3)	96 (54.9)	35 (31.3)
You worked longer than 4 hours without a break	177 (74.4)	185 (76.4)	139 (79.0)	85 (75.2)
You worked longer than 8 hours a day without overtime pay (hourly employees only)[a,b]	169 (70.7)	111 (45.9)	90 (51.1)	46 (40.7)
You worked on holidays without extra pay[a,b]	153 (63.8)	116 (48.1)	97 (55.4)	48 (42.5)
You were told to work in hazardous environments (with unknown chemicals) without proper protection[a]	90 (37.2)	52 (21.6)	39 (22.2)	27 (24.1)
You worked without medical insurance[a,b]	185 (77.1)	112 (46.5)	97 (55.4)	37 (32.7)
You worked without workers comp insurance[a,b]	184 (76.7)	114 (47.3)	97 (55.4)	39 (34.5)
You were paid with things other than money, such as gift cards, tickets for goods, food, alcohol/drugs, housing/hotel room as a substitute to your wage[a]	29 (12.1)	17 (7.1)	14 (8.0)	5 (4.4)
You have had any other work experience you consider abusive or exploitative	57 (24.1)	60 (25.0)	42 (24.1)	29 (25.7)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Labor Trafficking in Construction and Hospitality

Final Report Analyzing Victim Recruitment, Exploitation, and Service Needs to Identify Strategies for Prevention and Intervention

Intimidation, Threats, and Fear

Although significantly more survey participants who worked in hospitality (64%) reported experiencing intimidation, threats, and fear than those who worked in construction (44%), the most common type in both industries was verbal abuse, such as being belittled, humiliated, or put down by their employer for not doing exactly what they were told (28% construction workers and 34% hospitality workers). Those with hospitality experience were significantly more likely than those with construction experience to have been threatened to behave or bad things would happen (34% and 19%, respectively) and been told "stories" about bad things happening to others who did not follow orders (28% and 20%). Within hospitality, workers in hotels were more likely than workers in restaurants to be threatened about bad things happening (46% and 25%) and be told "stories" (34% and 25%), whereas restaurant workers (31%) were more likely to have suffered consequences (e.g., docked pay, abuse) for failing to follow orders than hotel workers (21%). One worker described threats to their family and threats to blacklist the worker:

> *You know, they know we needed that. Threaten our family. Talking about we'll never work again. You know, we won't never get a license for this, a license for that. We will never work again. You know, taking our pay. We was losing a lot of money, you know, where a lot of guys want to just quit and they didn't even care no more. So that was, you know, it's just—a lot of us loss our encouragement. You know, but we didn't have a choice a lot of times. And that was the sad part. We didn't have no choices. And they made that quite naturally clear. (Construction Worker, Chicago)*

EXHIBIT 12.

Intimidation, Threats, and Fear, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
You have been threatened by your employer or people who help your employer to behave or follow their orders or bad things would happen to you[a,b]	49 (18.9)	83 (33.6)	46 (25.4)	52 (46.0)
Your employer or people who help your employer have ever told you "stories" of how bad things had happened to others who did not follow orders[a,b]	49 (20.1)	70 (28.3)	45 (24.9)	38 (33.6)
You have been threatened by your employer or people who help your employer to behave or follow their orders or you would not be able to work anymore in this industry (blacklisted)	45 (18.5)	60 (24.4)	48 (26.7)	25 (22.1)
You have been belittled, humiliated, or put down by your employer or people who help your employer for not doing exactly what you were told	68 (28.0)	84 (34.1)	67 (37.2)	34 (30.1)
You have suffered "consequences" (e.g. docked pay or hours; verbal abuse; physical abuse) because you failed to follow an order from your employer or someone who helps your employer[b]	58 (23.8)	68 (27.8)	55 (30.7)	24 (21.2)
You have been forbidden (or prevented from / or told not to) to socialize with outsiders (such as health workers, outreach workers, government inspectors, or union representatives)	37 (15.4)	35 (14.3)	27 (15.1)	13 (11.6)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

More Serious Threats and Abuse, Including That of a Physical Nature

Construction and hospitality workers were similarly likely to experience threats and physical abuse. Threats and physical abuse were reported by fewer than one-third of survey respondents (29% in each industry). The most common types for workers in both industries were threats to the call police or any manner of threats when workers tried to leave, complain, or seek help for their situation. Although workers did not describe physical abuse in the interviews, one expert mentioned employers using physical abuse: *"We do see cases where... an employer or the trafficker is... physically abusive towards the person. But I'd say more often we see the other forms of coercion as opposed to physical abuse."* (Expert, Chicago)

EXHIBIT 13.
More Serious Threats and Abuse, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Physical abuse (including beating, kicking, slapping, etc.)	29 (11.4)	18 (7.3)	14 (7.9)	7 (6.2)
Threats of physical abuse (including beating, kicking, slapping, etc.)	22 (9.2)	15 (6.2)	15 (8.5)	5 (4.5)
Kept in an enclosed environment where you could not leave (including physically restrained)	15 (6.3)	12 (5.0)	10 (5.7)	4 (3.6)
Threats of harm to you in any other form	22 (9.2)	21 (8.7)	16 (9.1)	9 (8.0)
Threats of harm to your family or pet in any form	8 (3.3)	6 (2.5)	5 (2.8)	2 (1.8)
Threats to call the police on you	32 (13.4)	25 (10.4)	22 (12.6)	8 (7.2)
Threats to your family	8 (3.4)	3 (1.2)	2 (1.1)	2 (1.8)
Threats to deny you food	19 (7.9)	15 (6.2)	13 (7.3)	6 (5.4)
Threats to harm your co-workers	14 (5.9)	11 (4.5)	10 (5.6)	3 (2.7)
Physical harm in any form when you tried to leave, complain, report, or seek help for your situation	15 (6.3)	12 (4.9)	10 (5.6)	5 (4.5)
Your employer, or someone working with your employer, has ever threatened you in any manner (such as verbal threats) when you tried to leave, complain, report, or seek help for your situation	28 (11.7)	31 (12.8)	25 (14.1)	13 (11.6)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Abuses of a Sexual Nature

Although sexual abuse was even less common overall than the more serious threats and abuse in the previous section, it was reported by significantly more hospitality workers (27%) than construction workers (17%). The most common types of sexual abuse reported by respondents who worked in hospitality involved unwanted touching or physical contact (17%), verbal harassment of a sexual nature (16%), and unwanted sexual advances (15%). In the interviews, sexual abuse or sexual coercion was primarily described as employers who pressured workers into having sexual relations with them. In some instances, "agreeing" to sexual contact resulted in either more favorable treatment or avoidance of punishment. This situation was mentioned in both construction and hospitality industry jobs. As a worker explained, *"Some of them get sexually involved with some of them... guys. Because they promised them guys extra money and extra things for sexual advances and stuff like that, you know?... Yeah, but they had to... do sexual things and everything for the promise of getting higher pay and things like that. And it never turned out right, like I told'em"* (Construction Worker, Chicago).

EXHIBIT 14.
Abuses of a Sexual Nature, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Unwanted touching or physical contact of a sexual nature[a]	24 (9.4)	41 (16.9)	31 (17.5)	15 (13.4)
Verbal harassment of a sexual nature[a,b]	26 (10.4)	38 (15.8)	33 (18.8)	13 (11.7)
Any unwanted sexual advances[a]	12 (4.8)	36 (15.0)	27 (15.3)	15 (13.6)
You were encouraged or pressured to do sexual acts or have sex, including taking sexual photos or videos	6 (2.4)	7 (2.9)	5 (2.8)	4 (3.6)
Someone threatened to show explicit photos or videos to others or post on social media	6 (2.4)	4 (1.7)	4 (2.3)	1 (0.9)
Sexist work environment (sexist jokes, derogatory comments about people based on gender, calendars or photos of nude women or men)[a]	10 (4.0)	19 (7.9)	18 (10.2)	5 (4.5)
You were forced to do something sexually you did not feel comfortable doing	9 (3.7)	8 (3.3)	6 (3.4)	4 (3.6)
You were forced to engage in sexual acts with family, friends, or business associates for money or favors	8 (3.3)	3 (1.2)	3 (1.7)	2 (1.8)
Forced you to trade sex for money, shelter, food or anything else through online websites, escort services, street prostitution, informal arrangements, brothels, fake massage businesses or strip clubs	6 (2.5)	9 (3.8)	9 (5.1)	2 (1.8)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Debt Bondage

Less than half of survey respondents (43% of construction workers and 47% of hospitality workers) indicated experiencing employer-sponsored debt or bondage. Construction workers were significantly more likely than hospitality workers to be told that the work they did was worth less than its actual value, so that they had to work more hours to pay off debt (29% and 19%, respectively), whereas hospitality workers were significantly more likely than construction workers to have had an employer reduce their pay by cutting down the number of hours they could work (33% and 21%). However, in the interviews, examples of debt bondage were provided only for the construction industry. Examples included situations in which workers would pay for the training, tools, and gear they needed to use on the job or had to pay to replace materials used in the job. Employers would then deduct this debt from workers' pay. As one worker explained,

> *And it's always—and stuff is not always put up front, like that kind of thing that 'You're going to pay for it.' That's taking out your pay without you knowing it. You could get fed and I could get taken out of your pay.* (Construction Worker, New York)

Some workers also owe part of their earnings to pay for employer-sponsored housing. As one expert reported, *"We continue to hear about debt, continue to hear about the, essentially, the fees that people are incurring, obviously prior to coming into the work and then that just continuing with these things like housing and other components being deducted."* (Expert, Chicago). Another expert explained how money can be withheld from a paycheck through retainers (*retenes* in Spanish):

> *There was also somebody else who mentioned that they have* retenes, *which means that their money is taken from their paycheck in case... something is damaged or there's something going on. So that money is taken from their check. It's supposed to be given back, but sometimes that doesn't happen. And with this specific person that I'm talking about..., they just didn't receive the* retenes *back. And this is happening within the construction sector.* (Expert, Denver)

EXHIBIT 15.
Debt Bondage, by Industry

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
You were charged fees or overcharged for goods/services you purchased from your employer (i.e., it would have been cheaper to purchase the good/services somewhere else)	36 (14.0)	38 (15.5)	28 (15.6)	18 (16.1)
You were told that the work you did is worth less than it is actually worth, which means you have to work more hours than you should in order to pay off a debt[a]	72 (28.9)	46 (18.9)	39 (21.9)	19 (17.0)
You were charged excessive interest on a loan to repay your employer for pay advances or goods/services they previously purchased for you	17 (6.8)	13 (5.3)	10 (5.6)	8 (7.1)
Someone tried to reduce your pay by charging you excessive fees or overcharging you for things such as rent, food, broken items, or other items	24 (9.6)	24 (9.8)	20 (11.2)	11 (9.8)
Someone tried to reduce your pay by cutting down the hours you could work[a]	52 (21.3)	80 (33.3)	63 (36.2)	33 (29.7)

[a]Significant difference between construction and hospitality.
[b]Significant difference between restaurants and hotels.

Relationships Between Types of Exploitation

To better understand the complicated relationship between exploitation means and industry, we also constructed a series of association networks to observe the interrelated nature of exploitation experiences. The descriptive statistics for each industry network are displayed in **Exhibit 16**. After listwise deletion, the number of observations in each industry network ranged from 369 to 102. All networks proved to have stable edge weights and centrality metrics. Density ranged from 0.29 to 0.34, and the average edge weights were very consistent across networks, ranging from 0.46 to 0.48. This consistency makes sense because all networks were based on the same dichotomous variables.

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EXHIBIT 16.
Industry Network Descriptive Statistics

Network	Density	Average Edge Weight	# Communities	Average Degree	# Observations
Overall	**.31**	**.48**	**4**	**14.65**	**369**
Construction	.34	.48	4	16.29	195
Hospitality	.29	.46	4	14.08	211
Restaurants, bars, and food service	.33	.47	4	15.92	154
Hotels, motels, and resorts	.28	.46	4	13.22	102

Across almost all metrics, the individual nodes conveying the highest centrality were so despite the operationalization, meaning that central nodes typically had high degree, betweenness, closeness, and eigenvector centralities. However, centrality metrics did essentially change between each of the networks (**Exhibit 17**). For the overall sample, the single most central node—defined by degree, betweenness, and closeness—was workers' being told that authorities would not believe them. Additionally, it was overwhelmingly clear that workers also were commonly threatened with industry blacklisting. Within each of the networks for the different industries, construction was largely defined by being threatened with industry blacklisting, being forbidden from socializing outside of work, and being threatened with calling the police. Restaurants, hotels, and other hospitality workers had issues with wages and hours, like being paid with nonmonetary items or being charged with excessive interest in debts to one's employer. Generally, the differences and similarities between the centrality measures for network nodes convey that some experiences, such as being threatened with industry blacklisting, are highly prominent components of workers' exploitation regardless of context. On the other hand, some specific forms of exploitation are highly dependent on that context, being prominent in the structure of exploitation for some workers (e.g., working in sexist work environments for female workers).

EXHIBIT 17.

Centrality Measures: Top Three Prominent Labor Abuse and Exploitation Indicators, by Network

Network	Degree	Betweenness	Closeness	Eigenvector
Overall	1. Told authorities won't believe you 2. Threatened to have police called 3. Charged excessive interest on debt to employer	1. Told authorities won't believe you 2. Threatened with industry blacklisting 3. Charged excessive interest on debt to employer	1. Told authorities won't believe you 2. Threatened with industry blacklisting 3. Charged excessive interest on debt to employer	1. Threatened with industry blacklisting 2. Charged excessive interest on debt to employer 3. Pay reduced by excessive fees or overcharging
Construction	1. Threatened with industry blacklisting 2. Forbidden to socialize with outsiders 3. Threatened to have police called	1. Threatened with industry blacklisting 2. Belittled or humiliated 3. Forbidden to socialize with outsiders	1. Restricted communication with other workers 2. Threatened with industry blacklisting 3. Forbidden to socialize with outsiders	1. Threatened with industry blacklisting 2. Threatened with other forms of harm 3. Threatened for trying to leave, complain, or seek help
Hospitality	1. Paid with nonmonetary items 2. Threatened to have police called 3. Charged excessive interest on debt to employer	1. Paid with nonmonetary items 2. Overcharged for good/services by employer 3. Charged excessive interest on debt to employer	1. Paid with nonmonetary items 2. Threatened to have police called 3. Charged excessive interest on debt to employer	1. Threatened to have police called 2. Charged excessive interest on debt to employer 3. Pay reduced by excessive fees or overcharging
Restaurants, bars, and food service	1. Paid with nonmonetary items 2. Forbidden to socialize with outsiders 3. Threatened with other forms of harm	1. Told authorities won't believe you 2. Suffered consequences for not following orders 3. Charged excessive interest on debt to employer	1. Told authorities won't believe you 2. Paid with nonmonetary items 3. Forbidden to socialize with outsiders	1. Paid with nonmonetary items 2. Threatened with other forms of harm 3. Charged excessive interest on debt to employer
Hotels, motels, and resorts	1. Instructed to lie to officials 2. Threatened with physical abuse 3. Charged excessive interest on debt to employer	1. Instructed to lie about employer's identity 2. Instructed to lie to officials 3. Threatened with physical abuse	1. Instructed to lie to officials 2. Threatened with physical abuse 3. Charged excessive interest on debt to employer	1. Threatened with physical abuse 2. Charged excessive interest on debt to employer 3. Pay reduced by excessive fees or overcharging

Additional Experiences of Labor Abuse and Exploitation

Interviewees also described some forms of labor abuse in ways that that were not explicitly covered in the survey, highlighting issues related to immigration status, contracts, housing and transportation, and bias and discrimination. Although some of these experiences fit into the labor exploitation and abuse categories included in the survey, the interviews highlighted vulnerabilities that employers leverage in perpetrating abuse.

Immigration Status

Employers used workers' immigration status to exploit them in two main ways: recruiting them to migrate for exploitative jobs and implicitly and explicitly threatening their legal status as a way to keep them in exploitative work situations. Some employers, in both construction and hospitality, convinced immigrants to enter exploitative jobs by promising housing, migration support, and other resources. For example, *"We saw a lot of withholding of documentation or promising immigration status, even though employers really had no oversight or ability to do that, to provide the documentation"* (Expert, Chicago). Others mentioned cases in which sponsors of unaccompanied children exploited these children's labor by implicitly and explicitly asking for money in return for sponsorship. As one expert described,

> *The other scenario we're seeing a lot can be both of the adults, but often with minors, where, in order to get released from immigration custody, you need a sponsor. And often they don't have a sponsor. So you're looking for... somebody that you can show a connection to, but you probably don't know very well. And then we do see sometimes, well, that sponsor then will take advantage of the situation and say, "Well, now you owe me for helping you out and getting released." And then they might make up something and be like, "Oh, it cost me $2,000 to get you released." Or "I had to pay for your trip to get to Colorado and so now you owe me." And so then they use that to kind of show that they owe them.* (Expert, Denver)

Respondents commonly mentioned employers' threatening to get immigrant workers deported if workers complained about exploitative and dangerous working conditions. An expert described how these threats can even involve one's children: *"The threats are often about use of immigration. You know, 'He'll be deported. I'll call immigration' or, you know, 'If I call the police, then they'll call immigration. And you have kids here and you're never going to see your kids again. They'll stay here and I'll keep them and they'll pay off your debt for you,' things like that. But sometimes the threats are a lot subtler"* (Expert, Chicago). One worker described a situation in which threats were made even when one of the employees had work authorization:

Interviewer: Have you ever been threatened by your employer to behave or follow orders? Or would bad things happen to him?

Respondent: Threatened once. And sometimes we demand what is right and they tell us, "We can call the police to deport you." Which is impossible, because one here is legal, one has not crossed illegally. You have your document but like that, bold—I mean, they want to intimidate. (Construction Worker, Chicago)

Another worker explained how not having legal status prevents workers from seeking help:

> **Interviewer:** And did your employer or someone who works with your employer ever threaten you in any way as a verbal threat when you tried to leave, complain, or report or seek help?
>
> **Respondent:** No, they always told me this: "Go, call, complain, let's see who's going to lose, let's see who's going to win." They always said to me, like, "You know what? What they're going to do is they're going to fire you. Don't go on, if you go complaining, they're going to fire you," she told me, "They're going to run her." That's what they told me, they threatened me that I was going to get fired, and that's really what happened. They fired me.
>
> **Interviewer:** And have you ever considered going to the authorities? Like the police or to your church because of your situation?
>
> **Respondent:** No, no, no, I never tried, well, to go and complain anywhere because—well, when you're here illegal in this country, because you say "No, I can't go, they won't believe me," right? No, you don't dare, then. (Hospitality Worker, Summit County)

Contracts and Agreements

Employers also use contracts and agreements, or the lack thereof, in ways that reduce workers' ability to leave exploitative work situations and complain against abusive conditions. Workers and experts in both construction and hospitality discussed how a lack of employment contracts or legal work mechanisms, or under-the-table and off-the-books employment, was one way in which workers were exploited. Workers who were not legally employed also did not have access to benefits like unemployment insurance in the case of layoffs or workers' compensation for injuries. As one expert explained,

> *This is something I see a lot, specifically in the restaurant industry. Where you'll see someone hired under the table, I guess, would be the term you would use. You're not asking them to furnish any kind of documents. You're not giving them proper check stubs. You're not even registering them in your payroll. That's tremendously common. You know, you might hire somebody, somebody walks in your door, says, "Hey..., you have any work?" You're like, "Yeah, I need a dishwasher." And you put them to work, they're there for a month. You don't pay them. And you're like, "What are they going to do? File a complaint, come after me, sue me? No, they're not," right?* (Expert, Chicago)

Even when contracts do exist, they can be confusing to workers, be broken by the employer without consequences, or contain elements that are restrictive and harmful to workers. Workers who do not fully understand these contracts are at a disadvantage. This was mentioned in construction jobs. Other contractual issues included misclassification, or classifying workers as independent contractors when they should be classified as employees. Doing so was a way in which employers underpaid their workers by avoiding paying employment benefits and overtime pay and was mentioned by experts specifically for construction. For example,

> *At the end of the day, you know, the law is very clear. If you've hired somebody to do a job, then you need to pay them for the work they've performed. And all of this around... misclassifying a worker, calling them a 1099 employee, or paying them under the table, it*

> *doesn't change that. But a lot of employers think it does, right? So they try to find ways to hide or get around it.* (Expert, Chicago)

One expert mentioned noncompete agreements that may exist in staffing agencies for hotels in hospitality or subcontractors for construction, which prevent workers from seeking new employment in the same industry and therefore limit their ability to quit exploitative working situations. An expert described how this works:

> *I think in both of these contexts, both with the labor brokers and with staffing agencies, something that you all might look out for are restrictive employment agreements between the broker or the staffing agency and the general contractor or subcontractor in the construction context, or like with the hotel, the client of the staffing agency. That kind of restrictive employment agreement, like, for example, a worker who works for an agency who cleans hotel rooms. If that agency has some sort of agreement with the hotel, that the hotel won't hire that person, regardless of how good their work is, that would now be illegal in the state of Colorado because we passed a law at the state level that undermines the use of this type of restrictive employment agreement. But obviously, it's, again, an example of when workers can't, when they don't have other options, they can't get a different job. It reduces their bargaining power in the existing job. So even if working for the [hotel chain] would have paid them a lot more, the [hotel] won't hire them because they... agreed with the staffing agency to pay them 5,000 bucks if they ever poached one of their workers or something. So those kind of no-poach agreements are prevalent all across the country. In Colorado, they are now, as of last August, illegal, but certainly something that reduces worker bargaining power and makes people more vulnerable at work. But it's something we see in both hospitality and construction.* (Expert, Denver)

Housing and Transportation

Experts described employer-dependent housing as a source of exploitation, in that workers who complained about or left exploitative work situations often would lose their housing. Housing-related issues varied by industry and site. In Summit County, experts mentioned how seasonal hospitality workers on a J-1 visa were dependent on employers for their housing. Housing was generally incredibly scarce and expensive in the area. In New York, there was also a mention of hospitality workers both living in and working in a hotel. In construction, individual workers did not report having their housing tied to their employer. The experts and one worker who did report employer control described situations in which there were large groups of workers employed by the same employer who were also provided housing. As an expert explained,

> *They're definitely getting exploited on cost of where they're staying, which is also a big challenge when you're brought into these ski areas, like... Aspen and resort towns, because there's just not a lot of affordable housing. And so it makes it very difficult if you're trying to work. And that's an issue, I think, with a lot of the things we're talking about with the construction is that the jobs are there, but there's no affordable housing. And so they end up living further away in smaller towns. But now they're dependent on an employer for the transportation to get there, which also creates other dependencies for exploitation. (Expert, Denver)*

Experts also described situations in which employers provided both transportation and housing for workers, such that workers were limited in their ability to leave a worksite or employer-sponsored housing. Workers who worked in worksites that were far or isolated from where they lived were dependent on employer-provided transportation. In construction, an employer or subcontractor often transported workers to the worksite. There were also instances of workers who were transported to a worksite but then left there without a way to get back to their original location. One construction worker described being transported from worksite to worksite and not being allowed to go home even when he was back in his home city. One worker described a situation in which they were stranded by an employer in another city:

> *Interviewer:* Ok. And how did you get to those other cities? Do the contractors take you and return you? Or how?
>
> *Respondent:* Yes, that's right. You said it. They take you and you bring you. And then they forget.
>
> *Interviewer:* Do they leave you there? Don't they come back to you?
>
> *Respondent:* Yes, as an example. They tell you tomorrow I'll come for you. And then doesn't show up.
>
> *Interviewer:* And then they leave you in another city where you don't live?
>
> *Respondent:* Yes.
>
> *Interviewer:* Ok.
>
> *Respondent:* Yes. Once upon a time they left me dumped about a 3-hour drive from where I live.
>
> *Interviewer:* Oh, wow.
>
> *Respondent:* Yes.
>
> *Interviewer:* So it's on you to find a way to return?
>
> *Respondent:* Yes. (Construction Worker, Denver)

Bias and Discrimination

Another issue in both construction and hospitality jobs was bias and discrimination, whereby employers treated workers less favorably than their peers based on gender, race and ethnicity, English language proficiency, or immigration status. As one expert explained,

> *Another case did not involve a person who had a work visa. It was someone who didn't have any kind of immigration status and was told... about this job. And then in the situation wound up being treated very, very differently than the people who did have work authorization, which was... something that kind of stood out in our analysis of the case.* (Expert, Chicago)

A worker also described how workers were treated differently based on their race:

> *How can I put this? The more it got more wrong, more bad. You know, it got worse. Put it like that, you know, because you was looking at... one person ain't doing something, and then a lot of people just got punishment. The, especially the race of people, if it was one black said the wrong thing then all of us got punished. It was terrible.... Like low pay. Sometimes no pay for that day. Called names. You know, loss of hours, loss of a lot of things. It was just totally run amuck. It was terrible. And like I said, it only was because we have families and they needed us.* (Construction Worker, Denver)

Research Question 2:	**What is the underlying supply chain structure of labor trafficking in the construction and hospitality sectors? Who are the actors and agencies involved?**

The federal labor trafficking cases offered insight into the supply chain structure of labor trafficking cases. We also sought to explore what actors and agencies are involved in the supply chain structure and eventual disruption in both industries.

Supply Chain Structure

We created supply chain diagrams for each case studied. Pathways in the diagrams between echelons of the supply chain network depict how people are initially captured into the supply chain, thereby enabling consideration for disruptions in the early stages of movement. The goal of diagramming construction and hospitality labor trafficking supply chains is to uncover the structure of each supply chain, including pathways through the network system. Although any one labor trafficking case is not expected to use the whole network, the subset it does use will be contained within the network model. In this way, we can assess labor trafficking structure and disruptions from a more systematic perspective than has previously been possible. We leverage the fact that the cases are unique from one another to illustrate the diversity of pathways in which labor trafficking victims move from the "vulnerable population pre-recruitment" echelon to the "active exploitation" echelon.

All supply chain network diagrams are included in Appendix B. In this section, we walk through one diagram for the *Baxter v. Miscavige* case, illustrated in **Exhibit 18**. This case was unique in our sample because it includes exploitation in both hospitality and construction sectors. It also provides insight into exploitation and trafficking within the Church of Scientology.

The supply chain network diagram for the *Baxter* case highlights the pathways of the three main victims in the case—two adult females and one adult male. The recruitment countries vary geographically, spanning Australia, Germany, and Switzerland. This case was unique in that each victim had a different recruitment country even though all of their recruitment schemes involved familial connections. No visas were used in this case during the recruitment or movement process; rather, each victim was a citizen of their country of origin. The location section gives an overview of geographic places in which exploitation occurred. In *Baxter v. Miscavige*, exploitation sites were both domestic and international, as victims experienced exploitation at different stages of the trafficking scheme (e.g., recruitment, movement,

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housing). All victims were housed in facilities owned and operated by Scientology management officials, and this situation provided various opportunities for continued exploitation.

The last category depicts the types of exploitation that victims experienced during their duration of trafficking. The team developed six categories based on case data: working conditions, work hours, wage theft, physical abuse, sexual abuse, non-physical abuse, and legal document tampering. This case displayed five of six exploitation types, with victims' experiencing years of being trafficked. The disruption included in the diagram is the first recorded disruption found in the case record. This disruption occurred after one of the female victims, Victim Three, wrote a letter to high-ranking Scientology officers describing the physical and sexual abuse she endured while a Scientology employee. Importantly, it was the physical abuse aspect of the exploitation that got the attention of the high-ranking member of the church leadership.

EXHIBIT 18.
Example Network Diagram for *Baxter v. Miscavige* (construction and hospitality)
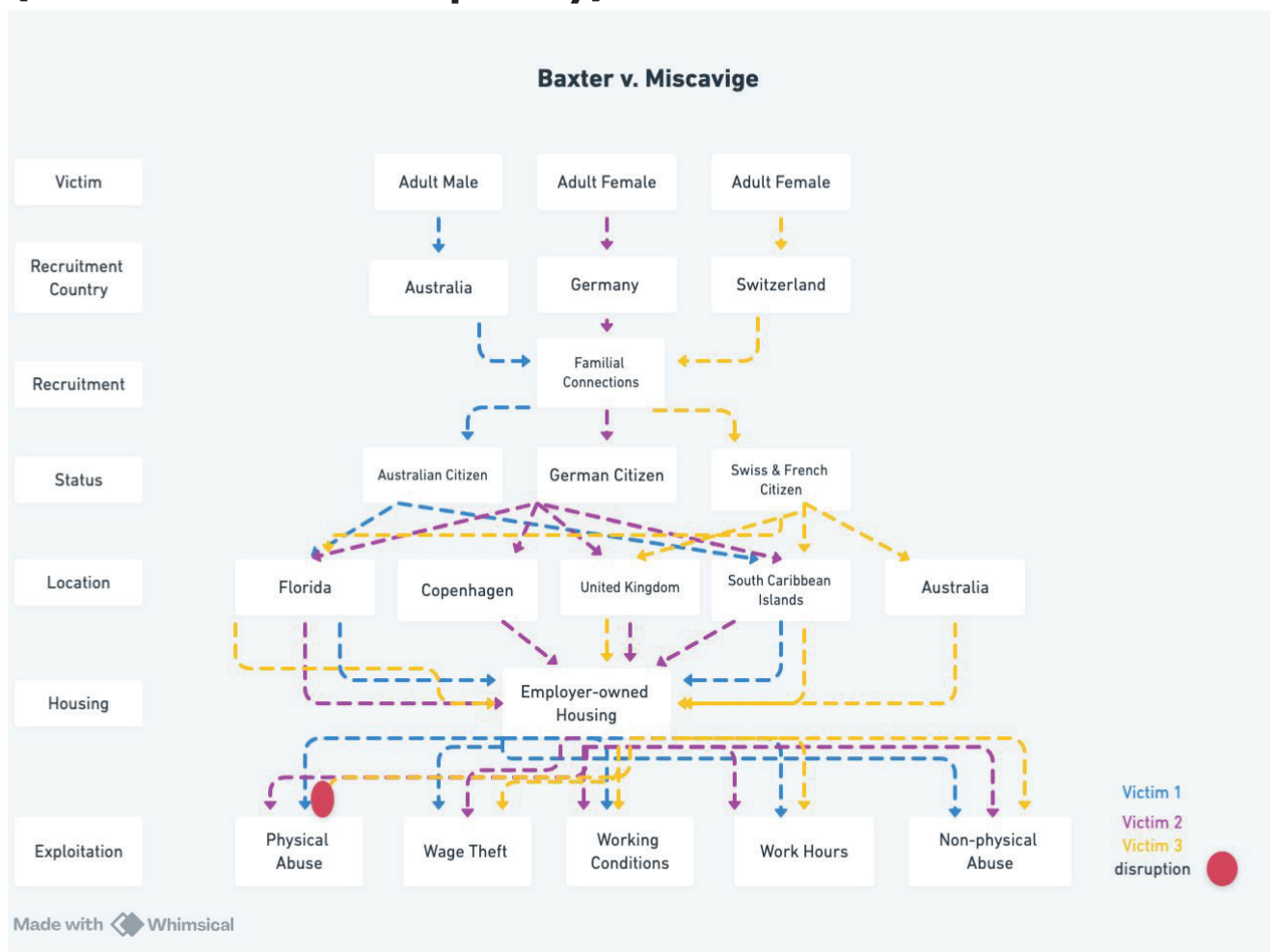
Summary of Supply Chain Structure

- Supply chain network diagrams across the cases studied show great variation in complexity of the flows, depending on both the scheme and the number of perpetrators and victims in the case. Although the echelons that are mapped are the same across cases, the flow between echelons displayed different patterns.

- For both hospitality and construction cases, disruptions occurred in the latter stages of the supply chain, usually during exploitation, though sometimes also occurring during housing.

- Supply chain network diagramming did not uncover notable differences between labor trafficking flows in construction cases and hospitality cases. Differences between the diagrams were attributable to the types of schemes and complexity and size of the operation more so than to industry alone. We did see patterns of more complex operations in construction cases, involving more victims and exploiters, that may be worth further research. Our data are limited to diagram all the pathways in some of the construction cases because the cases involved large numbers of unidentified victims, who often share very similar pathways from the labor trafficking supply chain.

Actors and Agencies Involved

Exhibits 19–21 provide summary statistics for the studied labor trafficking cases, overall (**Exhibit 19**) and then by sector—hospitality or construction (**Exhibits 20 and 21**, respectively). Note that the *Baxter* case is included in summaries of both construction and hospitality cases because that labor trafficking network required victims to work in both sector settings. Basic social network statistics demonstrate that the labor trafficking networks varied substantially in terms of size, as measured by node and edge counts, and complexity, as measured by a variety of statistics related to interconnectedness, hierarchy, and reachability. The overall social network statistics for the studied cases are described below and illustrated in **Exhibit 20**. Details for each measure can be found in the subsequent tables and figures.

Overall social network statistics

- Network size by node count (range: 24–324) and edge count (range: 69–1,541) both indicate that *Counseller* is the smallest case by node count, and *Baxter* is the largest case.

- Diameter, average geodesic distance, and density are all measures of network connectivity. The most basic metric of connectedness—diameter—reflects the length of the longest geodesic in the network, effectively measuring the greatest distance needed to connect any two nodes. For example, the length of the longest geodesic in the sample—9—occurs in *Baxter*; this means that 9 edges will connect any two nodes in that network. The diameters measured among the sample show broad variation, loosely correlated with overall network size. By contrast, the average geodesic distance is a measure of the *average* of the shortest paths between all pairs of vertices.

- Density measures the proportion of ties actually present in a network relative to the maximum number of ties. More densely connected networks are thought to be related to more efficient information and resource flows and may enhance network reliability. However, density is also inversely related to the size of social networks, and this trend is reflected in our cases (e.g., *Baxter* has the lowest density but the highest node count and the second highest edge count).

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- Finally, centralization allows us to understand the basic structure of the network by quantifying the variability of the individual actor centrality within networks; networks with a higher centralization are thought to reflect a more hierarchical structure in which a few nodes have high centrality relative to the remainder of the network. Because of this, highly centralized networks are thought to be more vulnerable to disruption. In this sample, centralization ranges from 0.33 (*Baxter*) to 0.57 (*Signal*).

EXHIBIT 19.

Social Network Statistics—Overall

Social Network Analysis Measure	*Adia*	*Batres*	*Baxter*	*Cotto*	*Counseller*	*Edwards*	*Gonzales*	*Signal*	*Zhong*	Overall Mean	Overall Range
Node count	114	64	324	276	24	105	32	162	241	164	300
Edge count	361	116	878	1,541	69	270	98	1,859	559	542	1,472
Density	0.06	0.06	0.02	0.04	0.25	0.05	0.20	0.14	0.2	0.1	0.23
Mean degree	12.67	7.25	10.84	22.33	5.75	10.29	6.13	22.95	9.28	11.2	16.58
Diameter	6	7	9	7	3	5	7	4	9	6.57	6
Average geodesic	2.78	2.85	3	3.05	1.91	2.49	3.00	2.10	3.12	2.75	1.21
Global transitivity	0.21	0.18	0.15	0.51	0.44	0.18	0.54	0.24	0.1	0.25	0.41
Centralization (degree)	0.46	0.5	0.33	0.42	0.53	0.55	0.32	0.57	0.46	0.46	0.22

Exhibits 20 and 21, respectively, further describe social network statistics for those cases classified as hospitality and those cases classified as construction.

EXHIBIT 20.
Social Network Statistics—Hospitality

Social Network Analysis Measure	Adia	Baxter	Counseller	Gonzales	Edwards
Node count	114	324	24	32	105
Edge count	361	878	69	98	270
Density	0.06	0.02	0.25	0.20	0.05
Mean degree	12.67	10.84	5.75	6.13	10.29
Diameter	6	9	3	7	5
Average geodesic	2.78	3	1.91	3.00	2.49
Global transitivity	0.21	0.15	0.44	0.54	0.18
Centralization (degree)	0.46	0.33	0.53	0.32	0.55

Note: *Baxter* appears in the summary tables for both construction and hospitality sectors because this case includes exploitation across multiple venues, including construction, food services, and hospitality.

EXHIBIT 21.
Social Network Statistics—Construction

Social Network Analysis Measure	Batres	Baxter	Cotto	Signal	Zhong
Node count	64	324	276	162	241
Edge count	116	878	1,541	1,859	559
Density	0.06	0.02	0.04	0.14	0.2
Mean degree	7.25	10.84	22.33	22.95	9.28
Diameter	7	9	7	4	9
Average geodesic	2.85	3	3.05	2.10	3.12
Global transitivity	0.18	0.15	0.51	0.24	0.1
Centralization (degree)	0.5	0.33	0.42	0.572	0.46

Note: *Baxter* appears in the summary tables for both construction and hospitality sectors because this case includes exploitation across multiple venues, including construction, food services, and hospitality

One of the important measures of network structure was the count of nodes for each type of actor in the illicit network. **Exhibits 22–24** summarize the different actors across all the cases and then for cases broken down by sector. The range for each actor type again reflects the relatively wide variation in the number of actor types by case, and nodes are not evenly distributed by actor type. Median numbers suggest that the typical labor trafficking network in our sample consisted of approximately 114 nodes total, with 3 exploiters and 8 victims. The typical criminal network in our sample included 9 corporate entities—5 internal and 4 external. Internal corporate entities are those businesses where exploitation actually occurred, whereas external corporate actors are those businesses, business partners, or laborer services that operated farther down in the supply chain. Such external corporate actors were often connected to the labor trafficking operation via regular business transactions or indirect facilitation of exploitative behavior (e.g., by profiting from cheaper end products or housing exploited workers, potentially without knowing about the labor trafficking operation). Across all networks, the "Other" actor type dominated the sample, reflecting the variety of different actors categorized as this type, including government officials and bystanders, who were directly or indirectly affiliated with the defendants and wittingly or unwittingly aided the labor trafficking operation. By contrast, the exploiter and internal actor types were the smallest categories across all cases, indicating a relatively small number of actors with direct involvement in criminal exploitation.

EXHIBIT 22.
Node Count by Person Type—Overall

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Node Count by Case
Adia	21	10	10	2	54	17	114
Batres	10	1	1	1	44	7	64
Baxter	5	19	1	167	98	34	324
Cotto	4	5	3	9	248	8	277
Counseller	4	3	1	6	7	3	24
Edwards	1	1	2	7	92	2	105
Gonzales	1	0	3	5	18	5	32
Signal	1	11	6	4	79	61	162
Zhong	10	11	4	38	161	16	241
Mean	6.33	6.78	3.44	26.56	89	17	149.22
Median	4	5	3	6	79	8	114
Range	20	19	9	166	241	59	300

These tables (summary statistics and node count by person type) illustrate that *Baxter* is the largest case by node and edge count of all the cases studied. **Exhibit 23** illustrates the social network as it appears in the *Baxter* case records. The red dot represents the identified exploiter in the *Baxter* case and the green dots represent the victims. Notably, although the number of identified victims and perpetrators in *Baxter* is relatively small, there are a larger number of internal actors, represented by the purple dots. This contrast may be explained by the more detailed information about various church members in court records and associated open-source information that documented the pattern of exploitative labor practices within the Church of Scientology. These internal actors were largely members of the church who had knowledge of the Sea Org practices and the abuse of minor workers but were not directly involved in the exploitation. *Baxter* is a good example of labor trafficking occurring in a large organization where exploitative labor has been taking place as part of the institution for multiple years. It is also important to note that the *Baxter* case records had more information from media and other open-source records related to the church's general exploitative labor practices than was found in many other cases, which may explain the larger number of identified internal actors.

EXHIBIT 23.
Full Social Network—*Baxter*

Full Network

Legend
Green: victim
Purple: internal actor
Red: exploiter
Gold: corporate internal
Orange: corporate external
Blue: other
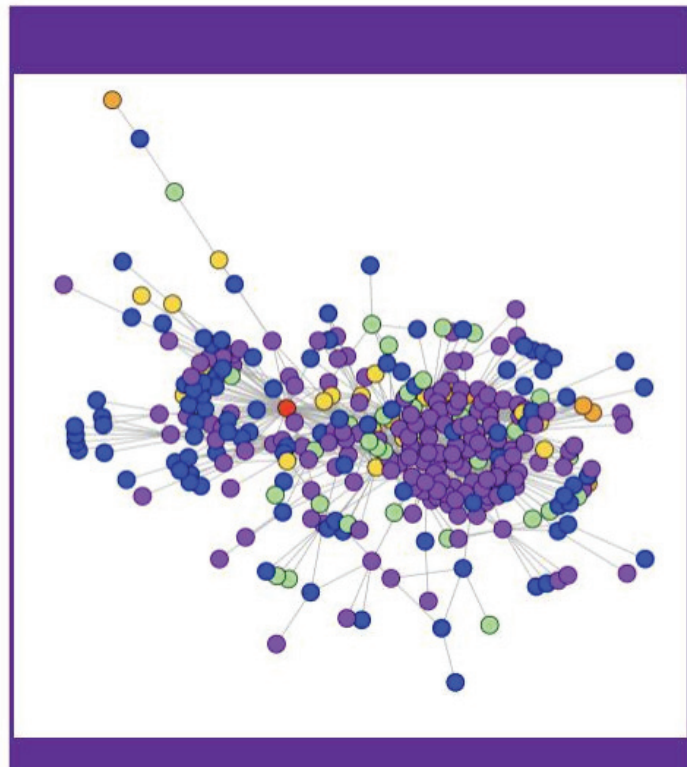
In general, trends observed across all cases for node count held for cases separated by industry type (see **Exhibits 24 and 25**). The typical hospitality case consisted of approximately 105 total actors, with approximately 2 exploiters, 5 victims, and 7 corporate entities. The typical construction case had a similar number of exploiters (3), but many more victims (61), and 16 corporate entities. "Other" was the largest actor type in two of the three hospitality cases and three of the four construction cases. In each sector, *Baxter* was the exception—the internal actor type was the largest actor category, reflecting the larger network of Scientology in which labor trafficking was embedded.

EXHIBIT 24.
Node Count by Person Type—Hospitality

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Node Count by Case
Adia	21	10	10	2	54	17	114
Baxter	5	19	1	167	98	34	324
Counseller	4	3	1	6	7	3	24
Edwards	1	1	2	7	92	2	105
Gonzales	1	0	3	5	18	5	32
Mean	6	7	3	37	54	12	120
Median	4	3	2	6	54	5	105
Range	20	19	9	165	91	32	300

EXHIBIT 25.
Node Count by Person Type—Construction

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Node Count by Case
Batres	10	1	1	1	44	7	64
Baxter	5	19	1	167	98	34	324
Cotto	4	5	3	9	248	8	277
Signal	1	11	6	4	79	61	162
Zhong	10	11	4	39	161	16	241
Mean	6	9.4	3	44	126	25.2	213.6
Median	5	11	3	9	98	16	241
Range	9	18	5	166	204	54	260

Centrality is another important network measure that helps us identify the importance of particular types of actors to the network or the vulnerability of particular actors to disruption. **Exhibits 26–28** provide information on the degree centrality of different actors overall and across hospitality and construction cases. **Exhibit 26** shows the mean degree centralities by actor type and case. Though the degree ranges of each showed high variability, both exploiters and internal corporate entities were highly central across all networks, with the mean degree centrality of both actor types more than double the mean degree centrality by case. External networks, by contrast, had relatively few ties in the network. As can be seen from **Exhibits 26 and 27**, this trend held across both network size and sector.

EXHIBIT 26.
Mean Degree of Centrality (Edge Count) by Person Type—Overall

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Degree Centrality by Case
Adia	6.57	21.2	20.4	5	9.59	21.29	12.67
Batres	4.2	42	70	6	4.73	13.71	7.25
Baxter	4.8	25.26	72	8.35	8.37	21.24	10.84
Cotto	71	78.8	35.33	24.44	19.34	48	22.33
Counseller	5	27.33	36	7.33	6.29	16.67	11.5
Edwards	2	72	47	10.29	7.67	67	10.29
Gonzales	6	NA	10	6.60	2.94	14.80	6.13
Signal	6.33	44.55	67.33	40	10.21	30.15	22.95
Zhong	5	29.09	80.5	7.03	6.78	11.13	9.28
Mean	12.32	42.40	48.73	12.78	8.44	27.11	12.58
Median	5	35.55	47	7.33	7.67	21.24	10.84
Range	69	57.6	70.5	35	16.4	55.87	16.82

EXHIBIT 27.
Mean Degree of Centrality (Edge Count) by Person Type—Hospitality

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Degree Centrality by Case
Adia	6.57	21.2	20.4	5	9.59	21.29	12.67
Baxter	4.8	25.26	72	8.35	8.37	21.24	10.84
Counseller	5	27.33	36	7.33	6.29	16.67	11.5
Edwards	2	72	47	10.29	7.67	67	10.29
Gonzales	6	NA	10	6.60	2.94	14.80	6.13
Mean	4.87	36.45	37.08	7.51	6.97	28.2	10.29
Median	5	26.30	36	7.33	7.67	21.24	10.84
Range	4.57	50.8	62	5.29	6.65	52.2	6.54

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EXHIBIT 28.

Mean Degree of Centrality (Edge Count) by Person Type—Construction

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Degree Centrality by Case
Batres	4.2	42	70	6	4.73	13.71	7.25
Baxter	4.8	25.26	72	8.35	8.37	21.24	10.84
Cotto	71	78.8	35.33	24.44	19.34	48	22.33
Signal	6.33	44.55	67.33	40	10.21	30.15	22.95
Zhong	5	29.09	80.5	7.03	6.78	11.13	9.28
Mean	18.27	43.94	65.03	17.16	9.89	24.85	15.93
Median	5	42	70	8.35	8.37	21.24	10.84
Range	66.8	53.54	45.17	34	14.61	36.87	22.7

Because betweenness centrality represents the number of times a given node is on the shortest paths of all other pairs of nodes in the network, social network researchers associate high betweenness with interpersonal influence resulting from the actor's broker or gatekeeper role. Removing nodes with high betweenness theoretically could disconnect many pairs of nodes in the network, or at least cause them to become more distantly connected.

Exhibits 29–32[7] provide information on the betweenness centralities of different actors overall and across hospitality and construction cases. **Exhibit 28** shows that exploiters and corporate internal actors were typically the most central when measured by betweenness. In four out of the nine networks, exploiters were the most important when measured by betweenness centrality; in two out of seven of the networks, internal corporate actors were the most important; and in one of the seven networks (*Edwards*), a victim had the highest betweenness, followed by the internal corporate actors. **Exhibit 29** illustrates the network model for *Edwards*. In *Edwards*, the victim (and the victim's relative, who also experienced exploitation) was closely connected to many other actors—largely customers in the restaurant or others who knew about the victim's working condition but were not internal actors.

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[7] The centrality measures in these tables are not normalized. See Appendix for six additional tables that present the normalized centrality measures.

EXHIBIT 29.
Full Social Network—*Edwards*
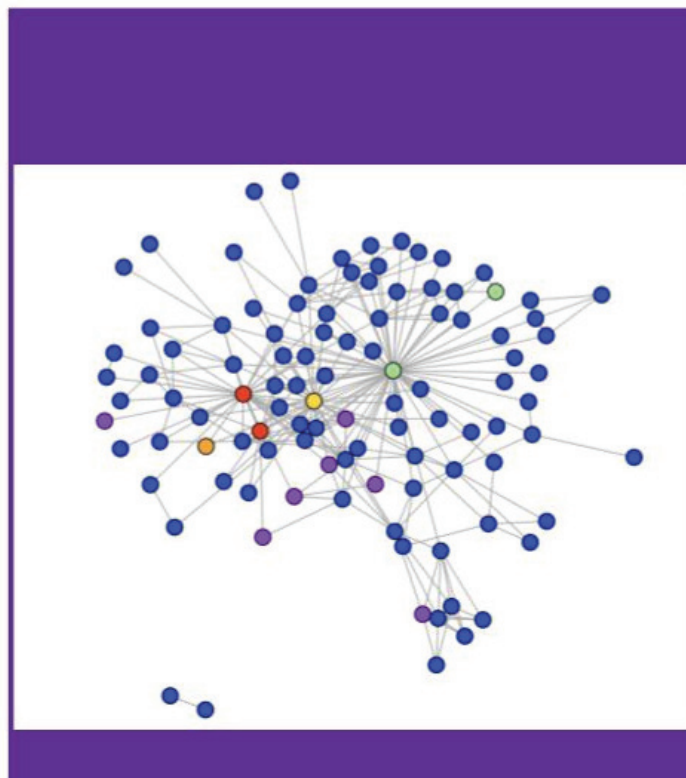
In one-half of the hospitality cases, internal corporate actors were more centrally located than exploiters, indicating that corporate actors in this sector may exert higher influence on the network than exploiters do. By contrast, this trend is not present among construction cases. For three cases (*Counseller, Gonzales,* and *Edwards*), external corporate actors had a betweenness of 0, meaning that such actors never lay on the shortest path in the network.

EXHIBIT 30.
Mean Betweenness Centrality by Person Type–Overall

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Betweenness Centrality by Case
Adia	35.24	720.07	414.98	0.14	110.19	297.95	201.19
Batres	1.77	1,009.07	2,083.74	0	63.35	222.89	116.53
Baxter	636	2,817.94	9,560.63	328.58	169.29	2,096.25	644.77
Cotto	5,962.23	7,547.17	3,686.92	883.04	240.94	1,510.44	551.42
Counseller	0	78.74	138.57	2.24	0	37.24	20.83
Edwards	0	1,723.5	1,267.91	211.06	39.21	3,157.15	149.12
Gonzales	0	NA	17.43	12.85	35.42	47.17	30.94
Signal	1.01	190.39	798.57	107.83	1.75	112.03	88.88
Zhong	502.41	2,693.59	10,100.18	133.79	218.97	427.69	507.76
Mean	793.18	2,097.56	3,118.77	186.61	97.68	878.76	256.83
Median	1.77	1,366.29	1,267.91	107.83	63.35	297.95	149.12
Range	5,962.23	7,468.43	10,082.75	883.04	240.94	3,119.91	623.94

EXHIBIT 31.
Mean Betweenness Centrality by Person Type–Hospitality

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Betweenness Centrality by Case
Adia	35.24	720.07	414.98	0.14	110.19	297.95	201.19
Baxter	636	2,817.94	9,560.63	328.58	169.29	2,096.25	644.77
Counseller	0	78.74	138.57	2.24	0	37.24	20.83
Edwards	0	1,723.5	1,267.91	211.06	39.21	3,157.15	149.12
Gonzales	0	NA	17.43	12.85	35.42	47.17	30.94
Mean	134.25	1,335.06	2,279.9	110.97	70.82	1,357.14	209.37
Median	0	1,221.79	414.98	12.85	39.21	1,197.1	149.12
Range	636	2,739.2	9,543.2	328.44	169.29	3,119.91	623.94

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EXHIBIT 32.
Mean Betweenness Centrality by Person Type–Construction

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Betweenness Centrality by Case
Batres	1.77	1,009.07	2,083.74	0	63.35	222.89	116.53
Baxter	636	2,817.94	9,560.63	328.58	169.29	2,096.25	644.77
Cotto	5,962.23	7,547.17	3,686.92	883.04	240.94	1,510.44	551.42
Signal	1.01	190.39	798.57	107.83	1.75	112.03	88.88
Zhong	502.41	2,693.59	10,100.18	133.79	218.97	427.69	507.76
Mean	1,420.68	2,851.63	5,246.01	290.65	138.86	873.86	381.87
Median	502.41	2,693.59	3,686.92	133.79	169.29	427.69	507.76
Range	5,961.22	7,356.78	9,301.61	883.04	239.19	1,984.22	555.89

Closeness measures centrality in terms of how proximate a given node is to all other nodes in the network. Calculated by taking the inverse of the average shortest distance between the node and all other nodes in the network, the metric is thought to indicate how quickly a node can interact—typically, communicate—with all others. An actor type highly central by this metric requires only a few intermediaries to communicate with all others, and thus is structurally important relative to others, particularly for tasks that require information integration. This measure of centrality indicates that exploiters and internal corporate actors were the most central in terms of closeness, whereas external corporate actors and other actors were least central.

Exhibits 33–35 provide information on the betweenness centralities of different actors overall and across hospitality and construction cases. Both *Cotto* and *Edwards* have a mean overall closeness of 0 because those two labor trafficking networks had more than one component; because of the overall disconnectedness of the network, closeness centrality was not calculated for these cases, and they were excluded from the summary statistics at the bottom of the table. Excluding *Cotto* and *Edwards*, exploiters were the most central actors in all cases except *Adia* (hospitality), where internal corporate actors had slightly higher centrality than exploiters (0.4 compared to 0.39). This trend generally held across construction and hospitality sectors.

EXHIBIT 33.
Mean Closeness Centrality by Person Type–Overall

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.36	0.4	0.39	0.36	0.35	0.42	0.37
Batres	0.37	0.5	0.58	0.41	0.34	0.44	0.37
Baxter	0.29	0.37	0.49	0.35	0.31	0.35	0.34
Cotto	0	0	0	0	0	0	0
Counseller	0.47	0.71	0.82	0.5	0.48	0.61	0.54
Edwards	0	0	0	0	0	0	0
Gonzales	0.36	NA	0.39	0.37	0.31	0.46	0.35
Signal	0.45	0.53	0.60	0.53	0.43	0.54	0.49
Zhong	0.3	0.38	0.45	0.37	0.32	0.37	0.33
Mean	0.28	0.36	0.41	0.32	0.28	0.35	0.31
Median	0.36	0.39	0.45	0.37	0.32	0.42	0.35
Range	0.47	0.71	0.82	0.53	0.48	0.61	0.54

EXHIBIT 34.
Mean Closeness Centrality by Person Type–Hospitality

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.36	0.4	0.39	0.36	0.35	0.42	0.37
Baxter	0.29	0.37	0.49	0.35	0.31	0.35	0.34
Counseller	0.47	0.71	0.82	0.5	0.48	0.61	0.54
Edwards	0	0	0	0	0	0	0
Gonzales	0.36	NA	0.39	0.37	0.31	0.46	0.35
Mean	0.30	0.37	0.42	0.32	0.29	0.37	0.32
Median	0.36	0.39	0.39	0.36	0.31	0.42	0.35
Range	0.47	0.71	0.82	0.5	0.48	0.61	0.54
Zhong	0.3	0.38	0.45	0.37	0.32	0.37	0.33
Mean	0.28	0.36	0.41	0.32	0.28	0.35	0.31
Median	0.36	0.39	0.45	0.37	0.32	0.42	0.35
Range	0.47	0.71	0.82	0.53	0.48	0.61	0.54

EXHIBIT 35.
Mean Closeness Centrality by Person Type

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Batres	0.37	0.5	0.58	0.41	0.34	0.44	0.37
Baxter	0.29	0.37	0.49	0.35	0.31	0.35	0.34
Cotto	0	0	0	0	0	0	0
Signal	0.45	0.53	0.60	0.53	0.43	0.54	0.49
Zhong	0.3	0.38	0.45	0.37	0.32	0.37	0.33
Mean	0.28	0.36	0.42	0.33	0.28	0.34	0.31
Median	0.3	0.38	0.49	0.37	0.32	0.37	0.34
Range	0.45	0.53	0.6	0.53	0.43	0.54	0.49

Research Question 3:	**Are there points throughout the stages of recruitment, control, and concealment of labor trafficking in these industries that could present opportunities for identification and intervention?**

Both survey and interview responses offer some insight into potential opportunities for identification of and intervention in labor trafficking or other labor exploitation in the construction and hospitality industries. A survey question asked whether respondents had ever told anyone about or sought help for any of the situations they reported in the survey (see **Exhibit 36**). Almost one-third (32%) of hospitality workers had reported their exploitation or sought help, which was fairly consistent among those who worked in restaurants, bars, or food service (34%) or hotels, motels, or resorts (31%). Construction workers were less likely to report experiences with exploitation or to seek help; only about one-quarter (26%) did so.

Of those who did disclose their experience or seek help after experiencing workplace exploitation, respondents overwhelmingly sought informal help from relatives, friends, or co-workers rather than formal help through service providers or law enforcement. Among those who reported exploitative experiences in construction and sought help, more than half (59%) disclosed to a friend, almost a third (30%) disclosed to a relative, and about a quarter (25%) shared with a co-worker. Only 5% of construction workers who had sought help relied upon a service provider, counselor, or lawyer, and 10% sought help from police. Similarly, among those who worked in hospitality, reported exploitative work experiences, and sought help, about half (51%) disclosed to a friend, nearly a third (31%) disclosed to a relative, and 38% disclosed to a co-worker. In contrast to construction workers, about a quarter of hospitality workers turned to service providers, counselors, or lawyers for help (26%), but, like construction workers, few (4%) hospitality workers sought help from law enforcement.

EXHIBIT 36.
Help-Seeking, by Industry Worked

Practice	Construction N (%)	Any Hospitality N (%)	Restaurants, Bars, and Food Service N (%)	Hotels, Motels, and Resorts N (%)
Total	**258 (100.0)**	**249 (100.0)**	**181 (100.0)**	**117 (100.0)**
Ever told anyone about or sought help for any of the situations reported				
Yes	63 (25.7)	77 (32.4)	59 (34.3)	35 (31.3)
No	182 (74.3)	161 (67.6)	113 (65.7)	77 (68.8)
If sought help, who did you tell?				
Relative	19 (30.2)	24 (31.2)	20 (33.9)	9 (25.7)
Friend	37 (58.7)	39 (50.6)	34 (57.6)	16 (45.7)
Co-worker	16 (25.4)	29 (37.7)	22 (37.3)	11 (31.4)
Service provider, counselor, or lawyer	3 (4.8)	20 (26.0)	17 (28.8)	8 (22.9)
Police officer	6 (9.5)	3 (3.9)	2 (3.4)	2 (5.7)
Neighbor	2 (3.2)	3 (3.9)	3 (5.1)	0
Stranger	1 (1.6)	1 (1.3)	0	1 (2.9)
Other	4 (6.3)	13 (16.9)	9 (15.3)	6 (17.1)

Data from interviews with industry experts, advocates, and workers provide insight to help better understand whether there are opportunities for identification of labor trafficking and other exploitation in the construction and hospitality industries. Similarly, interview data elucidate opportunities for interventions to address labor trafficking and other labor exploitation. We consider how employers recruit and control workers, as well as how they conceal exploitation, from an industry-specific lens.

Recruitment

Some interview respondents spoke to the ways that recruitment for exploitative work, including labor trafficking, occurs. As an advocate noted, the motivation for seeking and accepting potentially risky work can depend on individual characteristics such as gender, which is often related to the industry in which an individual seeks works. When asked whether it makes sense to consider industry-specific differences between workers, this advocate said,

> *That's a really good question. I think it does [make sense] in the sense maybe of, at the point of recruitment..., thinking more upstream of how could you intervene sooner before they get recruited into industry? I don't know that there's industry differences in terms of their needs or experience, certainly experiences, but I'm thinking more from a gender perspective, right? The male clients that we worked with who were trafficked in agriculture, some of which trafficked in home health care, mainly are Filipino survivors. They were really dedicated to continuing to support their families. Whereas I think the*

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> *women that we worked with, and—right, this is so gender normative, but it was true, right? It played out in front of us—had more maternal instincts or really focused on their children. Not to say men weren't, but it was more about the family unit, whereas women, I think, were more focused on their children, to almost to the extent of like, "Don't worry about me, I'm worried about my kids." And so I think the back end, I think there's probably more gender differences. And of course, there's gender differences by industry because we have a very segregated labor market. So I think to that extent, probably. Yeah.* (Expert, Chicago)

Understanding motivations for accepting work is important for thinking through strategies for disrupting recruitment for labor trafficking or other exploitative work in hospitality and construction. Advocates described different recruitment strategies by which clients had reported learning about job opportunities that ended up being exploitative, including word of mouth and social media. As one advocate said,

> *This kind of worker will often end up... giving us a call here at [Organization], showing up for a know-your-rights training, and then having a one-on-one sit-down with me where we talk about... what's happened, how all of this came to pass. And the story is pretty common, you know...: "I was on social media" or "I have a friend who's acquainted with them or worked with them directly or knew somebody who worked there." And so through word of mouth or through these social media posts—Facebook is very often a way they'll promote these jobs, these positions. And you'll just see a revolving door of people who don't last. So they'll have folks who they bring on for a month. They, they don't pay. Eventually, these folks get fed up, right? They say, "Well, you're not paying me, so I'm going to quit." And they just keep on doing that.* (Expert, Chicago)

Interview responses indicate that understanding both *why* and *how* workers are recruited into exploitative work is important in considering identification and intervention strategies. For those recruited on social media, for example, preventive outreach and education messaging disseminated in these same channels might be a reasonable intervention to consider.

Interviewees with professional expertise in construction reported that recruitment for day labor takes place in parking lots and other public places. Workers typically congregate in groups, commonly in the parking lots of home improvement stores such as Home Depot. Among construction workers recruited for work in these environments, study respondents described having a general understanding that if you are picked up for work there, you might not get paid. As one worker said, *"That is the risk faced by someone who does not have documents"* (Construction Worker, Chicago). However, there are at least some efforts in place already to help individuals find safe day laborer work, such as having some worker congregation sites organized by labor unions or other advocacy groups who can help vet potential employers and support workers who experience exploitative work experiences. One advocate described the local situation this way:

> *You'll see a lot of day labor.... A lot of folks will come in and go into the Home Depot.... In Chicago, we actually have places. The Latino Union actually runs one in [Neighborhood] where you can go and actually pick up workers. And they encourage that behavior,... as long as you're not doing something wrong to them.* (Expert, Chicago)

The parking lots and other public places where workers seek temporary day labor work could be a site for identification and for education and outreach initiatives.

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Control

To understand whether there are points during experiences with labor trafficking and other exploitation that could present opportunities for identification and intervention, we considered the various ways that exploitative employers exerted control over study participants. Control domains that we considered included breaks from work, ability to communicate, access to food and water, housing, identification and other documents, access to medical care, and freedom of movement and transportation.

Overwhelmingly, respondents described housing as a domain that employers used as a means to exploit workers. As introduced in the Housing and Transportation section, two main factors relating to housing affect employers' ability to exploit workers: (1) conditions associated with certain guest worker visas and (2) the lack of availability of affordable housing.

As has been extensively described elsewhere (Moorefield, 2019; Polaris Project, 2022; Terry, 2017), employer-sponsored visas create a culture of dependency and potential risk for workers who, if facing abusive workplace conditions, do not have the right to seek different employment and so must choose between working in an abusive situation and returning to their home country. Certain guest worker visa programs in the United States—including the H-2A (temporary agricultural workers), the A-3 and G-5 (personal attendants to diplomats and other international organization employees), and, in some circumstances, the H-2B (temporary non-agricultural workers) and J-1 (participants of cultural and employment exchange programs) programs—require employers to provide housing for temporary workers. Interview respondents described employer-dependent housing as a source of exploitation, as complaining about or leaving exploitative work situations often meant workers would lose their housing. Housing-related issues varied by industry and site. Interview respondents described the challenges faced by hospitality workers on J-1 visas in Colorado's ski country, where the cost of housing is untenable for low-wage workers and, as such, those who rely on employers for housing sometimes must face the decision to endure abuse at work or face deportation. As one expert related,

> *Well, that's an extraordinary problem for both workers on temporary visas and not. I'm sure you have found, especially in ski country, workers have nowhere to live. There's no housing. And so I think something that sort of undermines worker power even more is [that] [Resort Name] and other large employers in the mountains sometimes offer employee housing. So if your choice is "Complain about mistreatment on the job and get deported and lose my home," that's an even more stark choice. That is... a big... difference between—I mean, Denver has its own housing problems, but I think that the shortage of affordable housing in Colorado's mountain communities is sort of the elephant in the room for all low-wage workers. But certainly for people who are seasonal, it's very hard to find a place to live that's reasonable.* (Expert, Denver)

Similarly, in New York, some experts described situations in which hospitality workers were offered housing in the same hotels in which they worked.

> *The whole motel situation and the hotel situation is through the roof, hospitality.... I hear too many bad things. Because they're living there as well, you know. So you have someone living at a property that you own, you get a lot more chances to exploit them.* (Expert, New York)

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Unlike what was described among hospitality workers and other hospitality industry experts, housing was not often described as related to employer control over construction workers. Individual workers did not report having their housing tied to their employers. However, as described earlier, some study participants described that they had to live very far away from the sites of construction work because of the lack of affordable housing, and in these cases, some construction workers reported having to rely on their employer for transportation to and from their worksites.

Employers use their knowledge of workers' vulnerabilities (e.g., immigration status, financial situation) as a form of exploitation and control. Some workers stay in their current exploitative job because they need to provide for themselves and their families, and it is not clear that there are other job prospects or that other jobs won't be worse than their current situation. As described by one interviewee, abusive employers understand that workers feel vulnerable for various reasons and, as such, will tolerate exploitative work:

> *In the broadest sense, I would say anyone who doesn't know their rights is vulnerable to being exploited, right? But more to [your] question, anybody who is or is perceived to be an immigrant. And on top of that, an immigrant without status here in the United States. So I see it as a very deliberate practice on the part of employers to attract and employ a workforce who fits that criteria because they understand them to be more docile, obedient, complacent, more apt to tolerate abuse. And the reason for that is the inability to move freely, right? So once you get a job, once you've gone through the screening process, you really don't want to be in that situation again. So I very often meet people who are... working in these terrible situations because they have no guarantee that they can move on to something better, right? So I can make a fuss. But what do I do? You know, "I can't be unemployed, I've got a family, I've got responsibilities." So they tough it out. And these employers know that. So they often... try to push the envelope and figure out just how much people will put up with—you know, whether that means that they pay them late or they don't pay them at all, or they make deductions to their pay, or they try to put off the company's costs on these workers. "Oh, this piece of equipment broke" or "This customer left without paying" or "The till was short" or whatever it might be. You know, they try to do that. (Expert, Chicago)*

One expert described how employers understand that workers have little recourse for reporting labor trafficking and other labor exploitation.

> *I think there's also a fear of comp—again, a lot of these complaints come in after people already lost the job, which, again, makes it complicated for... trafficking cases. But there are some people who will stay on, right, or not complain or accept underpayment for a while because they fear that if they complain, they'll be let go, right? Or they won't get any work at all or their employer will tell someone else in the industry not to hire them. And so that's something that we see a lot, where people kind of withstand this for a while because they... fear that it's better than nothing. (Expert, Denver)*

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Prevention and Intervention

In particular, for both hospitality and construction, employers and subcontractors also use explicit threats around immigration as a control tactic. Interviewees discussed the need for education on labor rights, especially for workers who are undocumented. One hospitality worker explained,

> *You arrive so ignorant from our countries that you don't know that you have rights. Because I was always with that... fear all the time, that I didn't have any rights because of the situation that I was in. So I always thought that those who were legally here were the ones who had the right and that I had no right to anything, because that's why I was always discriminated against. Because of that situation that I was in. Well, I was working. So that was always my intimidation to want to seek help or to talk about what was happening to me, because I was always thinking about, "What rights do I have? I have no rights because I don't have this." Mhm. And now there is a lot more freedom, not like before. People started and began to arrive, very prepared people with studies, and I no longer think there is as much ignorance as before. I don't know if these cases of abuse continue to happen, but I think people are more prepared right now.* (Hospitality Worker, Chicago)

Concealment

Strategies that employers use to conceal exploitation of workers include avoiding any documentation or records related to employment agreements or agreement terms, as well as manipulating legal loopholes that strip workers of protections and enable exploitation. Using verbal agreements and misclassifying workers were discussed as methods of exploitation concealment in the construction industry specifically. Not specific to either construction or hospitality, experts also described restrictive employment agreements as a form of concealment. They noted the importance of preventing these kinds of actions, which they consider precursors to trafficking.

In the construction industry, and especially for day laborers, verbal agreements are used most often with hardly any written agreements, which makes it harder to hold abusive employers accountable.

> *I think that—and maybe this idea of a day laborer..., you'll probably,... I'm guessing with the industry experts, gonna hear more about that. But I think that there is so much... that's not written into a contract or... that there is that layer of vulnerability for [a] day laborer where you're sort of at the whim of what's available that day and you're going to come out and do it. And there is that aspect in construction that I think is unique, you know, where who is held accountable and how is going to look different based on the fact that there's a lot that's sort of verbal and not necessarily in writing around those things.* (Expert, Chicago)

To address this point of vulnerability, some interviewees described the importance of outreach and education campaigns to encourage workers to get all agreements and job offers documented in writing.

A second strategy to conceal exploitation of workers is purposeful misclassification of employees in such a way that they are not entitled to certain worker protections and employers are able to conduct wage theft and bypass the provision of benefits, including overtime, workers' compensation, unemployment insurance, and others. One advocate described how this strategy presented among workers that their agency supports:

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I wouldn't say our work is quite so narrow as to focus on any particular sector or industry, but the bulk of what we see here is service workers and misclassified workers. So where I encounter workers who are working in the trades or working in construction, they are often being contracted on... kind of a nebulous basis. So you'll have someone that shows up to work for an employer and that relationship is not clear. And what I mean by that is that they are often hired without any I-9 screening, without filling out a W-4.... And in some cases, you'll see employers turn around in the future and say, "Oh yeah, I'd love to pay you, but because I don't have employment verification documents for you, I can't do that. So, you know, show me a work permit, show me a valid Social Security number, and I'll be thrilled to pay you at that point. You know, I don't want to break the law by employing someone who doesn't have status." And it's not just as far as compensation. It's also on the day to day as far as working conditions, right? [Suppose] I need this safety equipment and we don't have the harnesses we need to work on roofs. "You're asking us to, you know, tie ourselves to one another with a rope instead of meeting proper OSHA [Occupational Safety and Health Administration] standards?" And they're like, "Well, what are you going to do? You're not going to go to the agency and complain." (Expert, Chicago)

In the construction industry, in particular, the misclassification of construction workers as independent contractors is a widespread issue that leaves workers vulnerable to abuse and allows exploiters to avoid detection or liability. A construction expert noted,

In construction—my anecdotal guesstimate—the number would be [that] 80% of construction workers are misclassified as independent contractors—80% of those who should be employees with the protections that being an employee creates. You get worker's compensation, you get unemployment insurance, you're entitled to overtime if you work more than 40 hours a week or 12 hours in a day in the state of Colorado. Basic employment protections. By misclassifying these workers as independent contractors, they're suddenly entitled to none of those protections that for the last 100 years, unions of others have advanced.... So what happens is..., most construction workers don't make overtime because they're misclassified as independent contractors.... But then, just the lack of any employment protection, they're skirting all employment laws, means that they don't have access to any of those protections.... So I think that allows and facilitates reliance on an undocumented workforce and sort of the creation of this underclass of exploited workers in the industry. (Expert, Denver)

This expert went on to describe how this phenomenon also occurs in the hospitality industry, but in a different way.

The outsourcing to temp staffing agencies and staffing companies also facilitates reliance on undocumented folks. And then the use of franchisees in the hospitality context is something—we've seen certainly a lot more misclassification of the franchisee if you're a cleaning worker..., a lot more than we do in the construction industry. So that kind of misclassification may also... impact undocumented workers. I guess that's one way that hospitality and construction are a little bit different. (Expert, Denver)

Opportunities for Identification and Intervention

Exploitation occurs in some discrete ways during worker recruitment and in the ways that employers control workers and conceal exploitation. Although some labor trafficking identification and intervention strategies are helpful in multiple contexts, some strategies can be targeted to address specific methods of exploitation. In this section we describe some of the strategies that interview respondents described to identify and intervene in the recruitment for exploitative work, the control of exploited workers, and the concealment of exploitation.

Interrupting Exploitation Before It Becomes Trafficking

Several interview respondents described the need to disrupt exploitation before it becomes trafficking. As described above, one respondent suggested that anti-trafficking experts consider thinking about why certain people and groups may be vulnerable to risky offers of employment, and then focusing education and outreach efforts on these communities. Another respondent, an advocate, described trying to speak to their government funding office about how important it was to focus on addressing inadequate employment laws that leave workers vulnerable to abuse.

> *I did go up to the OVC [Office for Victims of Crime] funders at the last meeting and say that I really think they need to be funding more employment law as well. It would really help prevent exploitation from reaching trafficking because if you interrupt exploitation, I think you start to stop it from reaching that level for a lot of industries. And they said there's no money for that kind of preventative work. And there's very, very little funding for employment law at all.* (Expert, Chicago)

Understanding and disrupting the larger systems that enable labor trafficking and other labor exploitation is a more powerful way of addressing labor trafficking than trying to prevent it at the individual level.

Labor Unionization

Some industry experts believed that labor unionization could help identify and address labor exploitation and trafficking. When an industry expert was asked if they were aware of any labor trafficking cases in construction, they answered,

> *No, and I think it's because—not to say, I don't want to say it's definitely not happening—but because it's such a unionized work force, I've asked the questions of, "How do you think this is happening?" And I've been met with, "Oh, there's no way it is because the union labor wouldn't stand for it." Right. If there is someone being exploited outside of the union or even if there was someone working on site outside of the union, they would be like, "Who is this guy?" And you know what I mean? Because it's such— those jobs are union jobs, right? But I do think that that probably is where it's happening is..., there's a worksite where there's 10 union laborers and... 2 not.... And who are those not [unionized], I don't know.* (Expert, Chicago)

Even in communities with a highly unionized workforce, there are still stipulations about union membership that may prevent vulnerable workers from joining. Even so, these unions can take an active role in supporting workforce rights for all workers and in helping to identify potential labor trafficking victims.

Workers' Rights Outreach and Education

Educating workers about U.S. labor laws, legal protections, and workers' rights was often suggested as a strategy to counter labor trafficking and exploitation in both the hospitality and construction industries. Such education will help workers understand their own rights and know how to intervene if they see other workers who are being exploited or abused. As noted above, some interviewees thought that focusing these outreach and education efforts in the same spaces in which employers recruit workers (for example, on social media) would be an effective strategy. As this study has demonstrated, the way that exploitation occurs is different in different labor sectors and among different populations, so it is important that outreach and education efforts be tailored to specific populations of potential workers or employees. As one interview respondent explained,

> I think the only real solution that we have as an organization, as a workers' rights nonprofit, is to do our very best educating workers. Because the rest—I mean, yes, we can advocate for policy changes and we can push for more resources for these agencies. We do and will continue to do so. But so much of this, unfortunately, is going to be hinging on the very populations that are suffering that exploitation, right? So if they know what to look for, if they know how to identify these things and... feel empowered to move expeditiously to take on these issues, they're much better situated to avoid the type of abuse we see. (Expert, Chicago)

Several interview respondents spoke to the need for culturally specific outreach and education. One community advocate described how vulnerability to victimization is different among various populations in Chicago, as well as how these subcommunities require specialized advocacy. When asked whether particular communities or populations are more susceptible to exploitation, this respondent said,

> That is something that I can't do anything because I know, for example, that there are big exploitation in the Chinese community. Big exploitation. But the people doesn't communicate with me because they don't know me, they doesn't speak Spanish and doesn't speak English. That's the problem, no? With many of them. Another community that sees exploitation... is the African community. The thing is that the African community is hiding under the African American community, you know.... And they suffer exploitation, discrimination, a lot of things, but they doesn't speak out because if they speak out, they can be identified by immigration. (Expert, Chicago)

While not described explicitly in other sites, industry and advocacy experts in Chicago described a robust system of culturally specific outreach and education strategies that show promise for reaching discrete worker populations vulnerable to abuse.

> So there are workers' rights centers here in Chicago that do a lot of that work and they are kind of all culturally specific. So, for example, [organization name], they're a faith-based workers' rights center here. And they have a large Spanish-speaking population with Spanish-speaking staff. And then they also have the Polish population with Polish-speaking staff.... We have [organization name], which is a workers' rights center for domestic workers from the Philippines. And all of their staff are also from that background and speak the language. So we have really good, culturally specific..., boots-on-the-ground organizations. From the city's perspective, government perspective, that was really important when... I was navigating this, [to] create a

coordinated response to human trafficking. There wasn't, like, I think people expected, "Well, what's the one policy that's going to stop trafficking?" I'm like, "No, no.... We need to go upstream and think about how to protect workers because then downstream they'll be less likely to be exploited. Or if they're exploited, they'll at least know their rights to get out of—hopefully have a pathway out of the exploitation." And so we did a lot of work around that, particularly in the care economy, because it became such a front-and-center issue as a result of the pandemic. But we created what we call a promotora *model where [we] funded—actually [organization name]—we funded them to pay domestic workers to go out into their community of domestic workers to inform them of their rights. And it was so successful that we funded it again this year and really broadened the scope to low-wage workers writ large to help them understand their rights and then inform their peers about their rights. And all of that is required to be in Chicago's top five languages, written material at minimum. And then when doing... webinars or in-person trainings or workshops, there's usually always English and Spanish. And then depending on who they're inviting, if they know of another language need, they'll provide it on site as well.* (Expert, Chicago)

Conclusions and Recommendations

Prior research on labor trafficking has suggested that exploitative experiences vary greatly across characteristics of individuals and the industries in which they work (Owen et al., 2015). However, there is limited research on what this variance looks like and how it may affect opportunities for prevention, identification, and intervention. Much of what is known about labor trafficking in particular industries comes from cases reported to the National Human Trafficking Hotline (NHTH), and those may be different from cases that have never been reported. The lack of information about the tactics used to exploit workers in different industries limits anti-trafficking practitioners' ability to effectively identify and respond to these abuses. The goal of this study was to develop foundational information on how labor abuse and exploitation operate differently in specific industries (construction and hospitality), including in variation in the supply chain structure, recruitment, control, and needs of individuals who experience labor abuse and exploitation.

Key Takeaways: Federal Case Review

The supply chain network diagrams illustrated that the complexity of the flows varies depending on both the type of illicit scheme and the number of perpetrators and victims. While the levels of the supply chain activity remain the same across cases, similar patterns can be identified through diagramming the network of the labor trafficking supply chain, and these patterns can guide interdiction efforts. For example, for both hospitality and construction cases, disruptions occurred in the latter stages of the supply chain process, usually during exploitation, though sometimes also during housing. This observation suggests that efforts are needed to identify opportunities for disruption earlier in the labor trafficking supply chain process. Supply chain network diagramming did not uncover notable differences between labor trafficking models in construction and those in hospitality. Differences were attributable to the types of schemes and complexity and size of the operation rather than industry. Among the studied cases, we observed more complex operations in construction, often with larger numbers of victims and coordination across multiple sites of victimization.

Housing was identified as a level in the labor trafficking supply chain where disruption might be more promising, particularly through regulation or inspection, as most housing identified in the studied cases involved substandard living conditions. Importantly, we find that in all the labor trafficking cases studied here, there is a network of people and connections that benefit from, support, or interact with the illicit labor trafficking supply chain, even though with single victims or small numbers of exploiters. The players in these networks vary across cases—sometimes being dominated by other actors who intersect with the illicit operation, such as customers, and other times being dominated by corporate actors who likely benefit materially from the existence of the supply chain that supports the labor trafficking, even if they are unaware of the specific illicit operation.

Key Takeaways: Surveys and Interviews

In the surveys and interviews, we found both similarities and differences in the nature of exploitation experienced by individuals who worked in construction and hospitality. Two categories of labor abuse were ubiquitous in both industries—nearly all workers reported experiencing at least one form of (1) deception and lies and (2) exploitative labor practices. Among key differences identified, restrictions on freedom of communication or movement were experienced by a significantly higher percentage of respondents who worked in hospitality than by those who worked in construction. However, the nature of these restrictions also varied by industry. For example, construction workers were more likely to experience a few specific types of restrictions, including having their identification papers taken; not being allowed adequate, food, water, or sleep; and not being allowed to seek medical care or medication. Although exploitative labor practices were reported by nearly all respondents, most of the specific types of exploitation were more common in construction. Overall, intimidation, threats, and fear were reported by more respondents in hospitality than in construction. Yet, the most common type in both industries was verbal abuse, such as being belittled, humiliated, or put down by an employer for not doing exactly what they were told. Relatively few respondents reported more serious threats and abuse, and they were reported at similar rates by construction and hospitality workers. Threats to call the police and threats of any manner when workers tried to leave, complain, or seek help for their situation were the most common. However, sexual abuse was reported by more hospitality workers than construction workers.

Help-seeking was uncommon among survey respondents—only a quarter of workers with construction experience and a third of those with hospitality experience told someone what happened or asked for help. Those who did disclose their workplace exploitation overwhelmingly sought informal help from relatives, friends, or co-workers rather than formal help through service providers or law enforcement. Data from interviews with industry experts, advocates, and workers provided insight to help better understand whether there are opportunities for identification of and interventions to address labor trafficking and other labor exploitation. For example, employers exploit the underlying reasons that vulnerable groups are seeking employment and use informal recruitment strategies such as social media and word of mouth. In construction, day labor recruitment is a common informal recruitment strategy. After they have successfully recruited workers, employers continue to take advantage of workers' vulnerabilities, such as in their immigration status or financial situation, as a form of control. Employers may also take advantage of the lack of availability of affordable housing to control employees. Employers conceal their exploitation through avoiding documentation and taking advantage of legal loopholes that strip workers of labor protections. In construction, for example, employers purposefully misclassify workers as independent contractors instead of employees. Doing so makes workers ineligible for certain labor protections and enables employers to conduct wage theft and bypass the provision of benefits, including overtime, workers' compensation, unemployment insurance, and others.

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Limitations

Federal Case Review

This analysis has some important limitations. Because our network models were constructed primarily from court data that would pick up mostly on connections between named defendants, we likely have biased models, and interpretation of social network measures is somewhat difficult. Additionally, we are limited in identifying actors and their connections to only those people named in court records or open-source documents. There could be other types of relationships between these actors that were not documented in the observed records. The illicit supply chains may also include additional actors whom we cannot identify. Finally, we examined a small number of cases in detail. These cases may not be fully representative of the labor trafficking operations in construction or hospitality sectors.

Despite these limitations, we are able to provide information about the structure and characteristics of those labor trafficking operations that have come to the attention of authorities or court officials. Through analysis of the supply chain structures and their actors and connections, this research helps provide a model for future research using different types of data on network connections, potentially through analysis of provider records or interviews with stakeholders in the illicit network.

Survey and Interview Data

The primary limitation to the survey and interview data is the non-probability nature of the sample, which limits the generalizability of the findings. For example, the surveys and interviews included a disproportionate sample of Spanish speakers and noncitizen participants, who may not be representative of people who work in these industries in the study sites. We also identified some discrepancies between survey responses and interview data—in some instances, participants changed their answers between the survey and interview; in others, participants' interpretation of the survey question appeared to deviate from the intended meaning. For example, one respondent who had indicated on the survey that they received a bad check later denied during the interview that they had ever received a check, insisting that all payments were made in cash because of their immigration status. Misinterpretations included situations in which a participant's interview responses indicated a less severe experience than what the survey suggested (e.g., interpreting being discouraged from using their phone during work hours as being restricted from communicating with family). We are systematically exploring these discrepancies to assess potential explanations and offer recommendations for instrumentation in the future. Another potential source of misinterpretation was language barriers—most of the survey and interview participants spoke Spanish as their primary language. Although the instruments were professionally translated, some respondents asked for some questions to be described in a different way for them to understand. The mode of administration varied; in some cases the field team read the survey and recorded responses and in others the survey was fully self-administered. Thus, only some respondents were able to ask clarifying questions in the language in which they were most comfortable.

Recommendations

Drawing on findings from the case review, surveys, and interviews, we identified potential points for focused prevention, identification, and intervention efforts. These recommendations fell into two broad categories: (1) educating and empowering workers and (2) promoting broader systems change.

Educating and Empowering Workers

Worker education and empowerment could be achieved through culturally specific worker outreach and community organizing that provide accessible information about workers' rights and U.S. labor laws, especially for foreign national workers, and ways to report employment abuses. This type of education and outreach should be multimodal, focusing on places where workers congregate (e.g., recruitment sites for day laborers), the same channels that employers use for recruitment (e.g., social media), and at community events focused on culture and food rather than on work and exploitation. Representatives from law enforcement and service provider organizations could also attend community events to build rapport with groups who may be less comfortable coming forward to report abuse and victimization.

In addition to outreach to communities affected by employment abuse, bystander education should be provided to unions and union members about how to identify and report exploitation they may witness occurring to workers who are not members (e.g., undocumented workers who are ineligible for union membership). On job sites that include a mix of union and nonunion workers, union members can serve as a powerful voice to help protect those they work alongside, even if the union cannot formally represent them.

Promoting Systems Change

It is important to note that efforts to educate and empower workers still place the responsibility for prevention on individuals who face pressure to accept risky work because of larger systemic forces such as poverty, social inequality, stereotypes and anti-immigrant attitudes, and cultural norms. Although educating and empowering workers is important, other efforts aimed at changing the larger systems that enable worker exploitation are sorely needed. These recommendations emphasize better enforcing current policies that protect workers and amending policies that unscrupulous employers use to exploit workers. We focus on guest worker visa policies, various labor protections, and restrictions on service provision.

Guest Worker Visa Policies

Guest worker visa policies need to be amended to allow workers to leave abusive employment situations and seek alternative employment, which is not currently permitted. The requirement that workers remain with a single employer creates an environment where threats of deportation and blacklisting can flourish. Moreover, employer-provided housing for those on guest worker visas needs to be monitored to ensure it meets standards. Inspecting housing may serve as an opportunity to identify and intervene in labor exploitation.

Labor Protections

Recommendations about labor protections focus on ways to help ensure that current regulations are enforced. Although departments of labor and occupational safety and health are empowered to investigate wage theft and inspect worksites, experts suggested that these investigations are not happening. Federal, state, and local agencies need additional resources and staffing to adequately identify and respond to issues of wage and hour violations and unsafe workplaces. Furthermore, creative investigative approaches that do not initially require the involvement of law enforcement, such as requesting auditors to inspect businesses that are suspected of inappropriate operations, should be considered. There also needs to be additional funding for legal aid for employment assistance. Even in states with strong employment laws, few pro bono or low-cost attorneys provide individual employment assistance (most employment attorneys work with unions and large groups, not individuals). In addition to serving individual workers, legal aid may also be a general deterrent as employers become aware of the greater potential of lawsuits related to employment abuse.

Legal loopholes that allow employers to exploit workers also need to be addressed. For example, the misclassification of workers as independent contractors instead of employees, which makes them ineligible for labor protections (e.g., unemployment, workers compensation), appears to be rampant in construction. Ensuring that general contractors follow legal hiring practices will give more workers access to the labor protections they are due. It is also critically important that government construction contracts are awarded only to companies with clean employment records. Companies with histories of wage theft or other labor abuse should be ineligible to bid on publicly funded construction projects. Moreover, in supply chains, all parties with connections to the illicit operations should be held accountable for their actions. Corporate entities involved in labor trafficking supply chains rarely face accountability, largely by using third-party staffing agencies, crew bosses, or other intermediaries that took the risk despite the corporate actors' reaping the benefits. Investigations into labor trafficking should encompass the entire supply chain, including corporate entities that benefit from labor abuse and exploitation perpetrated by intermediaries working on their behalf.

Service Provision

Funding for service providers need to be more flexible so they can assist victims of all forms of labor abuse and exploitation, not only those whose victimization meets the threshold of trafficking. Labor exploitation, abuse, and trafficking exist on a continuum. Understanding, preventing, and responding to labor trafficking cannot be effectively achieved without considering the full continuum of exploitation and abuse that workers endure.

Conclusion

Although the tactics used to exploit and trafficking workers may vary by industry, most existing research treats labor trafficking as a single phenomenon, and only a few industries have been subjected to a more focused inquiry. Using surveys, interviews, and a review of federally adjudicated cases, this study offered the first focused comparison of labor trafficking in two industries—construction and hospitality. We found both similarities and differences across industries and developed recommendations for both educating and empowering workers and promoting broader systems change. Although this study focused on two industries, all workers deserve to be treated with respect and feel empowered to report any exploitation or abuse they suffer at the hands of their employers.

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Appendix: Normalized Measures of Centrality

EXHIBIT 37.
Mean Closeness Centrality by Person Type–Overall (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.003	0.004	0.003	0.003	0.003	0.003	0.372
Batres	0.37	0.5	0.58	0.41	0.34	0.44	0.37
Baxter	0.001	0.001	0.002	0.001	0.001	0.001	0.343
Cotto	0.002	0.001	0.001	0.001	0.007	0.002	0
Counseller	0.02	0.031	0.036	0.022	0.021	0.027	0.543
Edwards	0.003	0.006	0.005	0.004	0.026	0.006	0
Zhong	0.300	0.380	0.450	0.370	0.320	0.370	0.330
Mean	0.100	0.132	0.154	0.116	0.103	0.121	0.280
Median	0.003	0.006	0.005	0.004	0.021	0.006	0.343
Range	0.369	0.499	0.579	0.409	0.339	0.439	0.543

EXHIBIT 38.
Mean Betweenness Centrality by Person Type–Overall (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.003	0.056	0.028	0	0.01	0.02	0.016
Batres	0	0.258	0.533	0	0.016	0.057	0.03
Baxter	0.013	0.028	0.091	0.003	0.002	0.019	0.006
Cotto	0.08	0.1	0.049	0.012	0.003	0.02	0.007
Counseller	0	0.156	0.274	0.004	0	0.073	0.007
Edwards	0	0.161	0.118	0.02	0.004	0.295	0.014
Zhong	0.009	0.047	0.177	0.002	0.004	0.007	0.067
Mean	0.015	0.115	0.181	0.006	0.006	0.070	0.021
Median	0.003	0.1	0.118	0.003	0.004	0.02	0.014
Range	0.08	0.23	0.505	0.02	0.016	0.288	0.061

EXHIBIT 39.
Mean Closeness Centrality by Person Type–Construction (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Batres	0.37	0.5	0.58	0.41	0.34	0.44	0.37
Baxter	0.29	0.37	0.49	0.35	0.31	0.35	0.34
Cotto	0	0	0	0	0	0	0
Zhong	0.3	0.38	0.45	0.37	0.32	0.37	0.33
Mean	0.24	0.3125	0.38	0.2825	0.2425	0.29	0.26
Median	0.295	0.375	0.47	0.36	0.315	0.36	0.335
Range	0.37	0.5	0.58	0.41	0.34	0.44	0.37

EXHIBIT 40.
Mean Betweenness Centrality by Person Type–Construction (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Batres	0	0.258	0.533	0	0.016	0.057	0.03
Baxter	0.013	0.028	0.091	0.003	0.002	0.019	0.006
Cotto	0.08	0.1	0.049	0.012	0.003	0.02	0.007
Zhong	0.009	0.047	0.177	0.002	0.004	0.007	0.067
Mean	0.0255	0.10825	0.2125	0.00425	0.00625	0.02575	0.0275
Median	0.011	0.0735	0.134	0.0025	0.0035	0.0195	0.0185
Range	0.08	0.23	0.484	0.012	0.014	0.05	0.061

EXHIBIT 41.
Mean Closeness Centrality by Person Type–Hospitality (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.36	0.4	0.39	0.36	0.35	0.42	0.37
Baxter	0.29	0.37	0.49	0.35	0.31	0.35	0.34
Counseller	0.47	0.71	0.82	0.5	0.48	0.61	0.54
Edwards	0	0	0	0	0	0	0
Mean	0.28	0.37	0.425	0.3025	0.285	0.345	0.3125
Median	0.325	0.385	0.44	0.355	0.33	0.385	0.355
Range	0.47	0.71	0.82	0.5	0.48	0.61	0.54

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EXHIBIT42.

Mean Betweenness Centrality by Person Type–Hospitality (Normalized)

Case	Corporate External	Corporate Internal	Exploiter	Internal Actor	Other	Victim	Mean Closeness Centrality by Case
Adia	0.003	0.056	0.028	0	0.01	0.02	0.016
Baxter	0.013	0.028	0.091	0.003	0.002	0.019	0.006
Counseller	0	0.156	0.274	0.004	0	0.073	0.007
Edwards	0	0.161	0.118	0.02	0.004	0.295	0.014
Mean	0.004	0.100	0.128	0.007	0.004	0.102	0.011
Median	0.0015	0.106	0.1045	0.0035	0.003	0.0465	0.0105
Range	0.013	0.133	0.246	0.02	0.01	0.276	0.01