

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 1–4,

Plaintiffs,

v.

RED ROOF INNS, INC., et al.

Defendant,

CIVIL ACTION FILE

NO. 1:21-cv-04278-WMR

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

W.K., E.H., M.M., R.P., M.B., D.P., A.F.,
C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:20-cv-5263-MHC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

PLAINTIFFS' STATEMENT OF DISPUTED FACTS

Pursuant to Local Rule 56.1(B)(2)(b), Plaintiffs provide the following statement of facts Plaintiffs contend are material and present a genuine issue for trial. Plaintiffs provide this statement in support of their Response to Defendants' Motions for Summary Judgment.

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I. Defendants' Roles

1. From 2010 to 2018, the Red Roof Defendants had two types of properties: corporate properties owned and operated by corporate affiliates, and franchise properties owned by third-party franchisees.¹

2. From 2010 to 2018, the Buckhead Property was a corporate property.²

3. The Smyrna Property was also a corporate property until December 14, 2012.³

4. Until December 14, 2012, Defendant FMW owned the land of the Smyrna Property.⁴

5. Defendant RRI III owned the land of the Buckhead Property during the entire 2010–2018 time period.⁵

6. During the time each of these properties were corporate properties, Defendant RRI West operated the hotel and employed some regional staff.⁶

7. During the time each of these properties were corporate properties, Defendant Red Roof Inns, Inc. employed the staff at the properties.⁷

¹ Alexander Dep. (Ex. 30) 28:12–16.

² Park Dep. (Ex. 34) 47:5–21.

³ Moyer Dep. (Ex. 18) 30:10–18.

⁴ Park Dep. (Ex. 34) 46:6–8.

⁵ Park Dep. (Ex. 34) 47:18–21.

⁶ Park Dep. (Ex. 34) 50:22–52:3; 60:14–17; 118:23–25.

8. Beginning on December 14, 2012, Defendant Varahi became the franchisee of the Smyrna property.⁸

9. During the time Varahi was the franchisee of the Smyrna property, Defendant Varahi was the owner of the property.⁹

10. Varahi was the manager of the Smyrna property after December 14, 2012.¹⁰

11. As the franchisee, Varahi employed the staff at the Smyrna property.¹¹

12. Red Roof Franchising, LLC was the franchisor of the Smyrna property after December 14, 2012.¹²

13. Defendant Varahi contracted with Defendant Red Roof Franchising, LLC to use the Red Roof brand.¹³

14. Defendant Varahi, beginning in December 2012, paid royalties and fees to Red Roof Franchising, LLC.¹⁴

15. Red Roof Franchising, in turn, paid Defendant Red Roof Inns, Inc.¹⁵

⁷ Limbert Dep. (Ex. 31) 143:4–8.

⁸ Varahi 30(b)(6) Dep. (Ex. 12) 24:3–16; Park Dep (Ex. 34) 57:2–8.

⁹ Varahi 30(b)(6) Dep. (Ex. 12) 24:3–21; Park Dep. (Ex. 34) 57:2–8.

¹⁰ Ex. 167 at § 1.1; 5.10.

¹¹ *Id.*

¹² Varahi 30(b)(6) Dep. (Ex. 12) 39:22–40:23; 44:6–10

¹³ Ex. 167 at § 1.1; 5.10.

¹⁴ Varahi 30(b)(6) Dep. (Ex. 12) 39:22–40:23; 44:6–10

II. Anyone who set foot on the Smyrna and Buckhead Red Roof Inn properties witnessed an open-air prostitution market.

A. Hotel employees and Plaintiffs directly witnessed non-stop prostitution.

16. Jane Doe 3 testified that at both hotels, “a majority of the patrons at those facilities were pimps and their workers.”¹⁶

17. Jane Doe 3 also testified, “You could see girls hanging off the balcony in their short clothes, ... girls walking around beating their feet with no clothes on, talking on cell phones, meeting johns, taking them up their rooms.”¹⁷

18. Women testified to loitering outside at both hotels and interacting with hotel staff while wearing heels, short dresses, “skimpy shorts,” and other, similar clothes.¹⁸

19. RP testified that she picked up “tricks in the parking lot” of the Smyrna property.¹⁹

20. AF testified that at the Smyrna property, she would be wearing “high heels, really short shorts, crop tops,” and would do so while loitering for dates and interacting with staff.²⁰

¹⁵ Park Dep. (Ex. 34) 82:13-84:5, 85:21-86:10.

¹⁶ JD3 Dep (Ex. 5) 314:6-10.

¹⁷ JD3 Dep. (Ex. 5) 160:20-161:2.

¹⁸ DP Dep. (Ex. 7) 263:3-21; TH Dep. (Ex. 23) 274:4-17; RP Dep. (Ex. 10) 218:16-23, 235:13-25; AF Dep. (Ex. 24) 242:8-14, 247:17-21, 248:19-24.

¹⁹ RP Dep. (Ex. 10) 218:16-23, 235:13-17.

21. MM testified about the Smyrna Red Roof, “There was pimps” and that “there was girls in short tops and bootie shorts and heels roaming around the property.”²¹

22. Employees at both hotels admitted they saw teenage girls, minors under 18 years old, being sold for sex.²²

23. Employees at both hotels acknowledged that what they saw was trafficking, not just voluntary prostitution.²³

24. Brenda Conner was a housekeeper at the Smyrna property from 2013 to 2016.²⁴

25. Conner described young women hanging “over the balconies with very little clothing.”²⁵

26. Michael Thomas was an employee at the Buckhead property in 2012.²⁶

²⁰ AF Dep. (Ex. 24) 242:8–14, 247:17–21, 248:19–24.

²¹ MM Dep. (Ex. 25) 269:8–23.

²² Castille Dep. (Ex. 40) 28:6-14 (Smyrna); Cole Dep. (Ex. 15) 37:4-38:7 (Smyrna); Thomas Dep. (Ex. 14) 32:6-12 (Buckhead); Hamilton Dep. (Ex. 41) 88:23-94:25 (Buckhead).

²³ Castille Dep. (Ex. 40) 22:18-24:17; Conner Dep. (Ex. 40) 52:10-12; Cole Dep. (Ex. 15) 24:3-5; Thomas Dep. (Ex. 14) 46:18-47:10; Hamilton Dep. (Ex. 41) 97:13-25.

²⁴ Conner Dep. (Ex. 40) 12:3–6.

²⁵ Conner Aff. (Ex. 67) ¶ 7 (Pltf-RRI0006900).

²⁶ Thomas Dep. (Ex. 14) 56:6-16.

27. Thomas described women “hanging on the balcony in a negligee.”²⁷

28. Many of the prostitutes at the Smyrna and Buckhead properties were with pimps.²⁸

29. In almost all cases, a pimp is a trafficker.²⁹

30. Signs that a person is a trafficker include, among other things that the person (1) “[p]ays in cash for one day at a time”; (2) “[e]scorts various men into the room and lingers until they leave, watching the door; (3) is “[s]een with a group of women”; (4) “[d]oes not leave the victim alone, calls often”; and (5) “[c]ontrols all or most money and identification.”³⁰

31. Pimps at both properties would keep watch of the prostitutes outside the rooms or wait around the corner.³¹

32. MB testified that at Smyrna her pimp would park outside her hotel room when she was seeing a date.³²

33. Jane Doe 2 described at both properties pimps posting up “a couple doors down,” watching the rooms while women entertained johns.³³

²⁷ Thomas Dep. (Ex. 14) 103:16–17.

²⁸ JD1 Dep. Vol. 1 (Ex. 1) 162:1-4; JD2 Dep. Vol. 1 (Ex. 3) 200:18–25.

²⁹ Whitmore Dep. (Ex. 172) 170:15–171:21.

³⁰ Ex. 168 at 26; Ex. 146 at 25.

³¹ MB Dep. (Ex. 9) 203:16–20 (Smyrna); JD1 Dep. Vol. 1 (Ex. 1) 162:1-4 (both properties); JD2 Dep. Vol 1 (Ex. 3) 200:18–25 (both properties).

³² MB Dep. (Ex. 9) (Ex. 9) 203:16–20.

34. Jane Doe 3 testified to “pimps in their cars in the parking lot” at both properties.³⁴

35. Buckhead employee Thomas described a pimp in a wheelchair who was a “regular,” “congregat[ing] in the parking lot” with “his buddies.”³⁵

36. Brenda Conner recounted a known pimp Smyrna would “sit in his truck” and “look[] upstairs right in his room” or sit in the hotel’s office when the women he pimped were seeing a john.³⁶

37. Conner also testified this man rented Room 201 continuously from the time she began working there “until they put him out.”³⁷

38. This same man was later identified to Red Roof executives by name.³⁸

39. The pimps at the Red Roof Inn Properties were not discrete.³⁹

³³ JD2 Dep. Vol. 1 (Ex. 3) 200.

³⁴ JD3 Dep. (Ex. 5) 160:20–161:2.

³⁵ Thomas Dep. (Ex. 14) 34:3–9, 36:8–13.

³⁶ Conner Dep. (Ex. 40) 35:6–12

³⁷ Conner Dep. (Ex. 40) 35:16–18.

³⁸ Sarkisian Aff. (Ex. 66) ¶¶ 7–8; Sarkisian Dep. (Ex. 29) 24:16–20.

³⁹ JD3 Dep. (Ex. 5) 161:7-9; EH Dep. (Ex. 8) 69:16–23; RP Resp. to ROG (Ex. 80) at 24 (“[T]he sex traffickers were openly walking around [the Smyrna Red Roof], flaunting their business.”); MB Dep. (Ex. 9) 203:14–20; DP Dep. (Ex. 7) 48:6–8, 296:22–297; DP Resp. to ROG (Ex. 71) at 23; TH Dep. (Ex. 23) 286:12–13; RK Dep. (Ex. 22) 269:23–272:1; CA Resp. to ROG (Ex. 70) at 25.

40. Jane Doe 3 testified, “Most of [the pimps] ha[d] on a pinky ring, lots of flashy jewelry, dr[o]ve nice cars, and they always [were] surrounded by women.”⁴⁰

41. EH also testified that the pimps at the Smyrna property were “[a]lways very flashy, always wearing diamonds.”⁴¹

42. At both locations, Plaintiffs and employees reported that victims or their pimps paid for rooms daily and with cash, even if they stayed for multiple days.⁴²

43. Vanessa Cole testified that at Smyrna, the majority of women she thought were being trafficked paid for their rooms in cash.⁴³

44. MB testified that she probably paid for rooms in Smyrna and that she always paid for rooms in cash.⁴⁴

45. RK testified that at the Buckhead property “we would go downstairs and pay for our rooms each day, pay for another stay in the hotel.”⁴⁵

⁴⁰ JD3 Dep. (Ex. 5) 161:7-9.

⁴¹ EH Dep. (Ex. 8) 69:16–23.

⁴² Cole Dep. (Ex. 15) 38:7 (Smyrna); MB Dep. (Ex. 9) 189:3–23 (Smyrna); RK Dep. (Ex. 22) 267:5–12, 271:23–24 (Buckhead); TH Dep. (Ex. 23) 272:12–17, 274:20–21 (Buckhead).

⁴³ Cole Dep. (Ex. 15) 37:4-38:7.

⁴⁴ MB Dep. (Ex. 9) 189:3–23 (Smyrna).

⁴⁵ RK Dep. (Ex. 22) 267:5–12, 271:23–24.

46. TH testified that at the Buckhead property, Bagz would put the room in his name, would pay for one night, then the next day she and RK would walk together to the front desk and pay in cash.⁴⁶

47. Buckhead employee Michael Thomas testified the young girls he believed to be engaging in commercial sex “would come in with cash in their hands a lot of times.”⁴⁷

48. The traffickers or their victims at both hotels would often rent multiple rooms with multiple girls in each room, and then men would come and go throughout the day.⁴⁸

49. Jane Doe 3 testified to the “coming and going with multiple men” at both hotels.⁴⁹

50. TH testified to “20-plus customers” coming to their room “within a 24-hour period day in, day out” at the Buckhead property.⁵⁰

51. Jane Doe 2 testified that, at both hotels, she had to have sex with about 15 people per day and that rarely was it just one person.⁵¹

⁴⁶ TH Dep. (Ex. 23) 272:12–17, 274:20–21.

⁴⁷ Thomas Dep. (Ex. 14) 37:12–13.

⁴⁸ JD3 Dep. (Ex. 5) 303:17–18; TH Dep. (Ex. 23) 138:2–7, 276:7–9; RK Dep. (Ex. 22) 265:12–16; JD2 Dep. Vol. I (Ex. 3) 203:204:2; CA Resp. to ROG (Ex. 70) at 28.

⁴⁹ JD3 Dep. (Ex. 5) 303:17–18.

⁵⁰ TH Dep. (Ex. 23) 138:2–7, 276:7–9.

52. CA testified to multiple men coming and going from the rooms rented by her trafficker at Buckhead.⁵²

53. Witnesses observed near-constant foot traffic in and out of rooms rented to prostitutes.⁵³

54. Forrest Castille worked the front desk of the Smyrna Red Roof Inn from 2008 to 2016.⁵⁴

55. Forrest Castille testified to seeing “8 to 10, maybe 15 to 20” girls or women at the Smyrna property at a time.⁵⁵

56. Forrest testified to seeing teenage girls, minors under 18 years old, being sold for sex at this hotel.⁵⁶

57. He also testified that the activity “never stopped,” with at times “over 50, 60 men a day.”⁵⁷

58. Vanessa Cole worked at the Smyrna property between July 2011 and December 2012.⁵⁸

⁵¹ JD2 Dep. Vol. I (Ex. 3) 203:9–19.

⁵² CA Resp. to ROG (Ex. 70) at 28.

⁵³ *See, e.g.*, Castille Dep. (Ex. 19) 22:15–17; Thomas Dep. (Ex. 14) 103:12–13.

⁵⁴ Castille Dep. (Ex. 19) 17:17–18.

⁵⁵ Castille Dep. (Ex. 19) 22:15–17.

⁵⁶ Castille Dep. (Ex. 19) 28:6–14.

⁵⁷ Castille Dep. (Ex. 19) 37:10–11, 37:19–23.

⁵⁸ Cole Aff. (Ex. 62) ¶ 4 (Pltf-RRI0005117).

59. She described “adult men going in and out of rooms ... in short order.”⁵⁹

60. Brenda Conner also said she saw “as many as 100 buyers” a day.⁶⁰

61. Conner also said she saw men entering and leaving rooms after a short period of time “[b]asically every day.”⁶¹

62. And at the Buckhead Property, Michael Thomas described women being “dropped off” and then “men coming out – in and out of their rooms.”⁶²

63. Plaintiffs also testified to the volume of men coming in and out of rooms.⁶³

64. Jane Doe 2 testified she would see from 1 to 20 men, or maybe more, a day.⁶⁴

65. Jane Doe 2 testified, “You literally don’t even get a break. It’s like literally back to back to back to back.”⁶⁵

⁵⁹ Cole Dep. (Ex. 15) 39:20–23.

⁶⁰ Conner Aff. (Ex. 67) ¶ 11 (Pltf-RRI0006900).

⁶¹ Conner Dep. (Ex. 40) 29:6–18; 106:12–15.

⁶² Thomas Dep. (Ex. 14) 103:12–13.

⁶³ *E.g.* JD2 Dep. Vol. 1 (Ex. 3) 199:13–200:7; DP Dep. (Ex. 7) 48:6–8, 296:22–297:2

⁶⁴ JD2 Dep. Vol. 1 (Ex.3) 199:13–199:18.

⁶⁵ JD2 Dep. Vol. 1 (Ex. 3) 200:5–7.

66. DP testified, “We had dudes following us around all the time. We’d have multiple people coming in and out of rooms” and that she “had a lot of traffic coming in and out of [her] room all times of day.”⁶⁶

67. At both locations, Plaintiffs described being made to see 10 or more buyers per day to satisfy their quotas.⁶⁷

68. TH testified, about her quota, that “[a] thousand was the minimum,” and that “to eat, we had to make a thousand dollars.”⁶⁸

69. WK described a quota of \$1,200 to \$1,500 a day, which meant up to 15 buyers.⁶⁹

70. Jane Doe 3 testified that her trafficker imposed a “thousand-dollar-a day quota,” which meant she had to see at least 10 buyers, often more.⁷⁰

71. AF testified that her quota was higher at the Smyrna property relative to other hotels because that hotel was always “really busy with action and prostitution.”⁷¹

⁶⁶ DP Dep. (Ex. 7) 48:6–8, 296:22–297:2.

⁶⁷ TH Dep. (Ex. 23) 149:6–150:17, 150:25–151:8; WK Dep. (Ex. 11) 120:7–121:9; JD2 Dep. Vol. 1 (Ex. 3) 189:20–190:2; JD3 Dep. (Ex. 5) 138:2–6; AF Dep. (Ex. 24) 214:10–22.

⁶⁸ TH Dep. (Ex. 23) 149:6–150:17, 150:25–151:8.

⁶⁹ WK Dep. (Ex. 11) 120:7–121:9.

⁷⁰ JD3 Dep. (Ex. 5) 138:2–4.

⁷¹ AF Dep. (Ex. 24) 214:11–22.

72. Jane Doe 2 testified there were buyers nearly every hour and men waiting their turn in the parking lot.⁷²

73. At the Smyrna property, employees described prostitution so pervasive that there was no need to report it to higher-ups because it was already known.⁷³

74. Castille testified to “rampant” prostitution at the Smyrna property.⁷⁴

75. Conner interacted with sex trafficking victims at the Smyrna hotel and advised some of them to go to a “safehouse for teenagers.”⁷⁵

76. When asked whether Conner told Bob Patel about these trafficking victims or others, Conner testified, “No, I did not go tell Bob, but Bob also seen.”⁷⁶

77. Varahi principal, Bob Patel, admitted to placing a sign at the front desk at Smyrna that read, “No Refunds after 15 Minute[s].”⁷⁷

78. Vickie Lam testified to seeing the sign.⁷⁸

⁷² JD2 Dep. Vol. 1 (Ex. 3) 122:13–19.

⁷³ Conner Dep. (Ex. 40) 70:3–4.

⁷⁴ Castille Dep. (Ex. 19) 127:25, 128:7–9.

⁷⁵ Conner Aff. (Ex. 67) at 1, ¶17.

⁷⁶ Conner Dep. (Ex. 40) 70:3–4

⁷⁷ B. Patel Dep. (Individual) (Ex. 17) 71:13–17.

⁷⁸ Lam Dep. (Ex. 35) 229:18–230:7.

79. A customer wrote a review of the Smyrna hotel in April 2016 commenting, “Turned out to be nothing but a hotel for hookers to score. A sign in the lobby said ‘no refunds after 15 minutes.’”⁷⁹

80. Castille testified that there “was always” prostitution occurring at the Smyrna property.⁸⁰

81. In 2014, in an email to Bob Patel, a Smyrna employee wrote, “[w]e are allowing too many hookers to stay here” and suggested that they call the police.⁸¹

82. In response to the email, Patel wrote only, “I will check But if know if they in property them to stay in your room or we will call police.”⁸²

83. Castille testified he “never” called the police to report prostitution.⁸³

84. Brenda Conner testified that Bob Patel told that if she saw prostitution or trafficking at the Smyrna Property, “don’t call anybody” and “don’t interfere with” what guests “had going on.”⁸⁴

85. At Buckhead, Michael Thomas recounted a “revolving door” of pimps and prostitutes.⁸⁵

⁷⁹ Ex. 121.

⁸⁰ Castille Dep. (Ex. 19) 21:3–7.

⁸¹ Ex. 111.

⁸² Ex. 111.

⁸³ Castille Dep. (Ex. 19) 125:5–6.

⁸⁴ Conner Dep. (Ex. 40) 29:24–25, 52:15–19.

86. Vanessa Cole floated as a general manager at the Buckhead property “between 2011 and 2012.”⁸⁶

87. During that time, Cole said prostitution was a “pretty consistent there.”⁸⁷

88. She also testified that she reported the prostitution “up the chain to ... Jay Moyer and others.”⁸⁸

89. Monica Nash Hamilton worked as a security guard at the Buckhead property on weekend nights from 2013 through 2016.⁸⁹

90. Nash said about Buckhead that she saw what she believed were pimps and prostitutes virtually “every weekend [she] worked there.”⁹⁰

91. Nash called the scene at Buckhead “Hotel Hell.”⁹¹

92. Nash testified about commercial sex occurring at the Buckhead hotel, “[i]t was just that obvious. There was no way you could not know.”⁹²

93. TH testified this activity “was in your face.”⁹³

⁸⁵ Thomas Dep. (Ex. 14) 27:21-24.

⁸⁶ Cole Dep. (Ex. 15) 28:3-10

⁸⁷ Cole Dep. (Ex. 15) 30:21–31:1.

⁸⁸ Cole Dep. (Ex. 15) 36:23–37:3.

⁸⁹ Hamilton Dep. (Ex. 41) 102:25-103:17.

⁹⁰ Hamilton Dep. (Ex. 41) 102:25-103:3.

⁹¹ Hamilton Dep. (Ex. 41) 26:5–22.

⁹² Hamilton Dep. (Ex. 41) 142:17–23.

⁹³ TH Dep. (Ex. 23) 276:15.

94. RP recalled at Buckhead that there were “girls in every single room” and “pimps everywhere.”⁹⁴

95. RP testified, “No one ever gets in trouble at the [Buckhead] Red Roof.”⁹⁵

96. JD3 testified about constant “requests for towels” to clean up between buyers at both hotels.⁹⁶

97. She also testified to trash cans “overflowing” with condoms at both locations.⁹⁷

98. Jane Doe 1 testified to handfuls of condoms in trashcans when she was at either location.⁹⁸

99. TH testified that in the Buckhead Property room she shared with RK, there would be up to 20 used condoms in the trash each day.⁹⁹

100. EH testified that a Smyrna property housekeeper would “bring her stacks of towels, on average three times per day.”¹⁰⁰

⁹⁴ RP Dep. (Ex. 10) 218:3–6.

⁹⁵ RP Dep. (Ex. 10) 218:7–20.

⁹⁶ JD3 Dep. (Ex. 5) 162:16–19.

⁹⁷ JD3 Dep. (Ex. 5) 162:16–19.

⁹⁸ JD1 Dep. Vol. 1 (Ex. 1) 194:16–17.

⁹⁹ TH Dep. (Ex. 23) 275:19–276:1.

¹⁰⁰ EH Dep. (Ex. 8) 125:5–11.

101. EH recalled a Smyrna property housekeeper saying to EH, “You’re making some good money today, huh?”¹⁰¹

102. RK and TH both described interactions with Buckhead property employees to get more linens.¹⁰²

103. MB testified that she “always needed” towels and rags at the Smyrna property.¹⁰³

104. AF also testified to requests for extra linens to both housekeeping and front desk employees at the Smyrna property.¹⁰⁴

105. At the Smyrna property, Vanessa Cole testified to “a lot of condom packages,” “costumes” and “wigs” in rooms.¹⁰⁵

106. When asked about signs of trafficking at the hotel, Cole also testified about the “dirty linen afterwards,” explaining that the sex workers “always request linen changes or extra linen for their rooms.”¹⁰⁶

107. Brenda Conner similarly described cleaning rooms at Smyrna with “condoms all over the floor” and “[a] whole lot of lubricants and condoms on the dressers.”¹⁰⁷

¹⁰¹ EH Dep. (Ex. 8) 127:16–25.

¹⁰² RK Dep. (Ex. 22) 267:5–18; TH Dep. (Ex. 23) 275:5–17.

¹⁰³ MB Dep. (Ex. 9) 195:13–23.

¹⁰⁴ AF Dep. (Ex. 24) 39:6–40:6.

¹⁰⁵ Cole Dep. (Ex. 15) 38:18–19.

¹⁰⁶ Cole Dep. (Ex. 15) 38:25–39:2.

108. TH likewise described “lube and boxes of condoms in the room” at Buckhead.¹⁰⁸

109. MB testified that one day at the Smyrna property, after she watched her trafficker beat another victim, she personally handed a housekeeper a trash can with an estimated 36 condoms,¹⁰⁹ making sure the condoms were on the top so staff could easily spot them.¹¹⁰

110. MB also gave the housekeeper bloody sheets and towels.¹¹¹

111. Fearing retaliation from her trafficker, MB told the housekeeper only that there was “a lot going on.”¹¹²

112. Women described hearing people being beaten from outside rooms.¹¹³

113. One Plaintiff described being beaten in the parking lot in public view or otherwise in the presence of hotel staff.¹¹⁴

114. At the Smyrna property, DP recounted having a loud fight with her trafficker, after which a security guard cornered her near the vending machine and

¹⁰⁷ Conner Dep. (Ex. 40) 24:12–13, 25:1–2.

¹⁰⁸ TH Dep. (Ex. 23) 276:3–4.

¹⁰⁹ MB Dep. (Ex. 9) 200:22–201:18.

¹¹⁰ MB Dep. (Ex. 9) 200:3–5.

¹¹¹ MB Dep. (Ex. 9) 196:20–197:6, 199:21–200:9.

¹¹² MB Dep. (Ex. 9) 196:20–197:6, 199:21–200:9.

¹¹³ *See, e.g.*, JD1 Dep. Vol. 1 (Ex. 1) Dep. 196:4–14; JD4 Dep. (Ex. 6) 106:22–107:1.

¹¹⁴ JD1 Dep. Vol. 1 (Ex. 1) 196:4–16.

warned her only to be more “quiet,” otherwise, “he was going to call the police because he knew what [they] were doing.”¹¹⁵

115. Jane Doe 4 described the Smyrna property as “ruthless,” with a constant flow of pimps, scantily clad women with bruises on their arms, girls being beaten within earshot, and even the sound of sexual violence through the thin walls.¹¹⁶

116. Smyrna property employee Forrest Castille testified that that he saw women beaten “like they were men.”¹¹⁷

117. He also testified, “I’ve seen bruises, black eyes. You could tell when somebody has been choked because ... their necks are bruised up.”¹¹⁸

118. He also witnessed how the traffickers “would turn them on to drugs so bad so that you had to work to get your dope or get your fix.”¹¹⁹

119. When asked how old the girls were, Forrest said “young.”

120. Forrest added that “the younger they were, to me, from my observation, the more they had control of them.”¹²⁰

¹¹⁵ DP Dep. (Ex. 7) 40:15–24.

¹¹⁶ JD4 Dep. (Ex. 6) 59:23–60:4, 106:19–107:1.

¹¹⁷ Castille Dep. (Ex. 19) 26:20–27:13.

¹¹⁸ *Id.*

¹¹⁹ *Id.*

¹²⁰ *Id.*

121. In December 2014, 16-year old WK escaped her trafficker, but not before he nearly drowned her at the Smyrna property.¹²¹

122. WK testified she had been trafficked there a few days prior.¹²²

123. She and her trafficker were arguing just outside a hotel room when he started choking her. WK recalls making eye contact with a hotel employee pushing a housekeeping cart, but he made no effort to help. The trafficker dragged WK back into the room where he nearly drowned her in the bathtub.¹²³

124. WK managed to run out of the room and down the street, where a man driving by spotted this 16-year-old girl, cold and wet, along the road. With his help, she made her way to a gas station where she called the police.¹²⁴

125. Monica Nash Hamilton testified that, at the Buckhead property, she tried to approach some men she saw with very “young girls.”¹²⁵

126. In response, these men “showed [her] their guns.”¹²⁶

127. She also described young girls who seemed to be controlled and “brainwashed” by their pimps.¹²⁷

¹²¹ WK Dep. (Ex. 11) 147:25–150:25; 151:15–153:24.

¹²² WK Dep. (Ex. 11) 151:15–21.

¹²³ WK Dep. (Ex. 11) 152:13–153:8.

¹²⁴ WK Dep. (Ex. 11) 148:4–153:24.

¹²⁵ Hamilton Dep. (Ex. 41) 89:1.

¹²⁶ Hamilton Dep. (Ex. 41) 87:2–88:18

¹²⁷ Hamilton Dep. (Ex. 41) 97:13–98:15.

128. Hamilton even knew that the young women didn't even have a choice in what they ate.¹²⁸

129. Cole also testified to signs that girls were also being controlled at the Buckhead property.¹²⁹

130. She testified that these girls were not allowed to look at the staff or engage with them, and that an adult checked them in, paying with cash.¹³⁰

B. Police witnessed prostitution at the Smyrna property, “a high crime lodging facility known for prostitution,” and the Buckhead property, “a trouble area for illegal drugs and prostitution.”

1. Smyrna Red Roof

131. Throughout Plaintiffs' trafficking, police reports described the Smyrna property and its parking lot as a location “notorious” for crime, including specifically prostitution.¹³¹

¹²⁸ *Id.*

¹²⁹ Cole (Ex. 15) 37:4–39:5.

¹³⁰ Cole (Ex. 15) 37:4–39:5.

¹³¹ Smyrna Compilation (Ex. A) at 1494 (Pltf-RRI00004385) (2015: “The Red Roof Inn is notorious for drug dealing and prostitution.”); *see also id.* at 56 (Pltf-RRI0003484) (2011: “This location is known for drugs and prostitution.”); *id.* at 322 (Pltf-RRI0002578) (May 2012: “This hotel is an area noted for illicit activity such ... prostitution.”); *id.* at 632 (Pltf-RRI0002880) (2013: “The Red Roof has seen a large increase of prostitution”); *id.* at 838 (Pltf-RRI0003105) (2014: “The hotel is also a frequent place where prostitution occurs.”); *id.* at 1672 (Pltf-RRI0003365) (2016: This parking lot is known for drugs, prostitution, and other crimes.”).

132. A 2011 police report reported that “[t]his location is known for drugs and prostitution.”¹³²

133. A 2012 police report reported that “[t]his hotel is in an area noted for illicit activity such ... prostitution.”¹³³

134. A 2013 police report reported “[t]he Red Roof has seen a large increase in prostitution.”¹³⁴

135. A 2014 police report reported “[t]he hotel is also a frequent place where prostitution occur.”¹³⁵

136. A 2016 police report reported “[t]his parking lot is known for drugs, prostitution, and other crimes.”¹³⁶

137. A 2016 police report described Smyrna as “a high crime lodging facility known for prostitution.”¹³⁷

138. A 2018 police report described it as an “area known for increased crime including drugs, robbery, and prostitution.”¹³⁸

139. A 2016 police report described the area as “known for high crime,

¹³² Smyrna Compilation (Ex. A) at 56 (Pltf-RRI0003484).

¹³³ *Id.* at 327 (Pltf-RRI0002578).

¹³⁴ *Id.* at 632 (Pltf-RRI0002880).

¹³⁵ *Id.* at 838 (Pltf-RRI0003105).

¹³⁶ *Id.* at 1672 (Pltf-RRI0003365).

¹³⁷ *Id.* at 1655 (Pltf-RRI0003350).

¹³⁸ *Id.* at 2016 (Pltf-RRI0003873).

prostitution, and drug use... .”¹³⁹

140. There were prostitution-related arrests at the Smyrna property.¹⁴⁰

141. Some of these reports confirm police interacted directly with hotel employees.¹⁴¹

142. A September 2012 police report of the arrest of three women for prostitution and one who was charged with keeping a place of prostitution, reported that police spoke to Vanessa Cole and list her as a witness.¹⁴²

143. A 2013 police report for the arrest of a 19 year old woman for prostitution detailed that police went to the front office and verified the woman was staying there.¹⁴³

144. Some police reports confirm guests told police they were prostitutes.¹⁴⁴

¹³⁹ *Id.* at 1699 (Pltf-RRI0003392).

¹⁴⁰ *Id.* at 20 (Pltf-RRI0002321).

¹⁴¹ *Id.* at 396-404 (*E.g.*, Pltf-RRI0002654–62) (September 2012: three women arrested for prostitution, and one also charged with keeping a place of prostitution); *id.* at 509-10 (Pltf-RRI0002761–62) (2013: 19-year-old woman arrested for prostitution); *id.* at 532-533 (Pltf-RRI0002788–89) (2013: 22-year-old woman arrested for prostitution); *id.* at 1092 (Pltf-RRI0004077) (2015: man arrested for pimping and keeping a place of prostitution, among other charges).

¹⁴² *Id.* at 396-404 (Pltf-RRI0002654–62).

¹⁴³ *Id.* at 509-10 (Pltf-RRI0002761–62).

¹⁴⁴ *Id.* at 279 (Pltf-RRI0002540); *id.* at 362 (Pltf-RRI0002610); *id.* at 1045 (Pltf-RRI0003251); *id.* at 1202 (Pltf-RRI0004175); *id.* at 1292 (Pltf-RRI0004273); *see also* Ex. 61 (Pltf-RRI0003810-Pltf-RRI0003816).

145. One 2012 police report reports two women confessed they were working as prostitutes.¹⁴⁵

146. Another 2012 police report reports a woman told police she had answered a Backpage ad to work as an escort and have sex for money with two men the night before.¹⁴⁶

147. A 2014 police report shows the guest told police “that she was a prostitute.”¹⁴⁷

148. A 2015 police report reports a man told police he had just patronized a prostitute.¹⁴⁸

149. A 2015 police report shows a man told police he “drove a prostitute to the Red Roof Inn” in exchange for crack.¹⁴⁹

150. A 2017 police report reports a guest told police she was a prostitute.¹⁵⁰

151. Some police reports confirm investigation led police to conclude that guests were engaged in prostitution.¹⁵¹

152. As one example, in 2012, police observed four women in a room with

¹⁴⁵ Smyrna Compilation (Ex. A) p. 279 (Pltf-RRI0002540).

¹⁴⁶ *Id.* at 362 (Pltf-RRI0002610).

¹⁴⁷ *Id.* at 1045 (Pltf-RRI0003251).

¹⁴⁸ *Id.* at 1202 (Pltf-RRI0004175).

¹⁴⁹ *Id.* at 1292 (Pltf-RRI0004273).

¹⁵⁰ Ex. 61 (Pltf-RRI0003816).

¹⁵¹ Smyrna Compilation (Ex. A) at 683 (Pltf-RRI0002936); *id.* at 762 (Pltf-RRI0003024); *id.* at 883 (Pltf-RRI0003149).

“a stack of folded \$20s lying on the dresser, a condom beside the \$20s, [and] used condoms in the trash.”¹⁵²

153. Hotel staff reported to police that guests were prostitutes.¹⁵³

154. For example, in 2011, Vanessa Cole reported “a steady flow of male subjects into and out of” certain rooms “at all times of the day.”¹⁵⁴

155. As another example, in 2013, Forrest Castille told police that a guest who had broken a window was a prostitute.¹⁵⁵

156. At least two police reports detail the experiences of women who escaped from traffickers at the Smyrna property.¹⁵⁶

157. In 2013, two nineteen-year-old guests called police after a man kicked them out of the room he rented when they said no after he “asked them if they wanted to prostitute.”¹⁵⁷

158. In 2017, a guest told police that “she was kidnapped and force[d] into prostitution.”¹⁵⁸

159. This report confirms that officer spoke to front desk staff and

¹⁵² *Id.* at 354 (Pltf-RRI0002602).

¹⁵³ *Id.* at 245 (*E.g.*, Pltf-RRI0002504); *id.* at 628 (Pltf-RRI0002885).

¹⁵⁴ *Id.* at 245 (Pltf-RRI0002504).

¹⁵⁵ *Id.* at 628 (Pltf-RRI0002885).

¹⁵⁶ *Id.* at 492 (Pltf-RRI0002744); *id.* at 1944 (Pltf-RRI0003627).

¹⁵⁷ *Id.* at 492 (Pltf-RRI0002744).

¹⁵⁸ *Id.* at 1944 (Pltf-RRI0003627).

housekeepers during the investigations.¹⁵⁹

160. Information given to Varahi and Red Roof by Cobb County Police in 2017 confirms that there was far more police activity at the Smyrna property than at any nearby hotel.¹⁶⁰

161. Police data in the Red Roof Defendants' possession showed that in the period from 2013–2016, the Smyrna property had more reported offenses and more arrests than 5 other hotels in Windy Hill area.¹⁶¹

2. Buckhead Red Roof

162. In 2013, law enforcement described the Buckhead property, too, as “a trouble area for illegal drugs and prostitution.”¹⁶²

163. In 2013, law enforcement also reported that “[t]his location has been known for heavy illegal narcotics and illegal prostitution activity...”¹⁶³

164. In 2015, law enforcement reported officers “were patrolling the area...due to recent increases of crime,” including specifically “prostitution.”¹⁶⁴

165. In 2016, law enforcement reported “[t]here has been an increase in

¹⁵⁹ *Id.* at 628 (Pltf-RRI0003628).

¹⁶⁰ *See* Ex. 91.

¹⁶¹ Smyrna Compilation (Ex. A) at 739 (RRI_WK_00003001).

¹⁶² Buckhead Compilation (Ex. B) at 292 (Pltf-RRI0000171).

¹⁶³ *Id.* at 315 (Pltf-RRI0000193).

¹⁶⁴ *Id.* at 716 (Pltf-RRI0000634).

illegal narcotics activity, prostitution, and entering auto's at the location."¹⁶⁵

166. In 2016, law enforcement reported there was an "increase of illegal narcotics and prostitution activity in the immediate area."¹⁶⁶

167. Police cited both prostitutes and johns from the 2010-2018 time period.¹⁶⁷

168. For example, a 2011 police report shows a woman was arrested for loitering for sex in the parking lot.¹⁶⁸

169. A 2012 police report shows two women were arrested for prostitution.¹⁶⁹

170. A 2013 police report shows two women were arrested for prostitution and one of them was charged with pimping and keeping a place of prostitution.¹⁷⁰

171. A 2014 police report shows two women were arrested for prostitution.¹⁷¹

172. A 2016 police report shows police arrested a man who told them he

¹⁶⁵ *Id.* at 748 (Pltf-RRI0000688).

¹⁶⁶ *Id.* at 830 (Pltf-RRI0000780).

¹⁶⁷ Pltf-RRI00006295 (Ex. 63); Buckhead Compilation (Ex. B) at 133-36 (Pltf-RRI0005291-94); *id.* at 194 (Pltf-RRI0005321); *id.* at 437-8 (Pltf-RRI0005348-49); *id.* at 863 (Pltf-RRI0000822); *id.* at 1125 (Pltf-RRI0001139).

¹⁶⁸ Ex. 167 (Pltf-RRI00006295)

¹⁶⁹ Buckhead Compilation (Ex. B) at 133 (Pltf-RRI0005291-94).

¹⁷⁰ *Id.* at 194 (Pltf-RRI0005321).

¹⁷¹ *Id.* at 437-8 (Pltf-RRI0005348-49).

was there to “hire a prostitute.”¹⁷²

173. A 2017 police report shows a man was cited for pandering.¹⁷³

174. In 2013, police encountered Anthony Shivers at the Buckhead property.¹⁷⁴

175. Police reported they arranged a meeting with a prostitute at the Buckhead property, and when they arrived, the woman was with Shivers.¹⁷⁵

C. Hotel customers witnessed “prostitutes everywhere” at Smyrna and the Buckhead “whoretel[s],” and they told Red Roof.

176. In 2013, then-President Andrew Alexander told press that he was “obsessed with customer feedback,” describing reviews as “authentic, unfiltered, direct communication from customers.”¹⁷⁶

177. Red Roof collected and distributed customer feedback from surveys, customer hotlines, and online review sites among its higher levels of management.¹⁷⁷

178. At least monthly, operations Vice Presidents like Jay Moyer and Vickie Lam received so-called “NR” or “negative review” reports compiling

¹⁷² *Id.* at 863 (Pltf-RRI0000822).

¹⁷³ *Id.* at 1125 (Pltf-RRI0001139).

¹⁷⁴ *Id.* at 242 (Pltf-RRI0000126).

¹⁷⁵ *Id.*

¹⁷⁶ Ex. 150 at 8 (RRI_WK_00012857).

¹⁷⁷ Lam Dep. (Ex. 35) 74:23-80:2.

information guests surveys sent upon checkout and calls made to a customer service hotline.¹⁷⁸

179. Alexander (and others)¹⁷⁹ also received reports from Reputology, an online-review aggregator that compiled reviews for Red Roof Inns all over the country from sites like TripAdvisor, Booking.com, and Expedia.¹⁸⁰

180. They received these reports at least weekly and sometimes daily.¹⁸¹

181. A sample of these reviews for the Smyrna location include the following:

- a. April 2012. “we were told by a motel employee that there was heavy prostitution activity at the location and that ‘the place really needed to be cleaned up.’”¹⁸²
- b. November 2012. “i stay at this property all the time and i would say half the time there some guy in the parking lot is offering me drugs or hookers. Additionally I usually see hookers staying in other rooms as Guests.”¹⁸³
- c. July 2013. “Prostitutes everywhere.”¹⁸⁴
- d. September 2014. “Then the traffic throughout the day....its a drug and prostitute headquarters.”¹⁸⁵
- e. March 2015. “Guest stated that prostitutes and drug deal going

¹⁷⁸ Lam Dep. (Ex. 35) 74:23-80:2.

¹⁷⁹ MacDonald Dep. (Ex. 36) 106:10–107:6.

¹⁸⁰ MacDonald Dep. (Ex. 36) 103:10–104:20.

¹⁸¹ Alexander Dep. (Ex. 30) 39:6–12.

¹⁸² Smyrna Compilation (Ex. A) at 295 (RRI_WK_00004870).

¹⁸³ Ex. 114 at 1–2 (RRI_WK_00004900-4901).

¹⁸⁴ Smyrna Compilation (Ex. A) at 218 (RRI_WK_00002477).

¹⁸⁵ Ex. 115 at 5 (RRI_WK_00002549).

down in the parking lot.”¹⁸⁶

- f. May 2015. “Would have been ok if I wanted drugs or a hooker.”¹⁸⁷
- g. April 2016. “Turned out to be nothing but a hotel for hookers to score. A sign in the lobby said ‘no refunds after 15 minutes.’”¹⁸⁸
- h. June 2017. “On several occasions a couple of people in our party were approached by females soliciting sex.”¹⁸⁹

182. A sample of these reviews for the Buckhead location include the following:

- a. August 2011. “There we re, I think, at least three different women (prostitutes) wandering around and approaching us. The whole grounds of the property was active and th ere was no way the staff couldn’t have noticed the activity or the noise.”¹⁹⁰
- b. January 2012. “Said numerous men were going in/ out of rooms with women.. seems illegal activity may have been going on.”¹⁹¹
- c. December 2012. “There was a bust by GA sheriffs for drug dealers and ‘ladies of the night’ at the motel.”¹⁹²
- d. October 2013. “Upon entering the parking lot, we checked in and circled to the back of the building, there were prostitutes getting in and out of cars.”¹⁹³

¹⁸⁶ Ex. 119 (RRI_WK_00000084) (Extract).

¹⁸⁷ Ex. 122 (RRI_WK_00002843) (Extract).

¹⁸⁸ Ex. 121 at 1–2 (RRI_WK_00004295-96).

¹⁸⁹ Ex. 123 at 2 (RRI_WK_00000420).

¹⁹⁰ Ex. 120 at 6 (RRI_WK_00004866).

¹⁹¹ *Id.*

¹⁹² Buckhead Compilation (Ex. B) at 177 (RRI_WK_00000830).

¹⁹³ Ex. 98 at 3 (RRI_WK_00002482).

- e. November 2015. “Hotel had prostitutes.”¹⁹⁴
- f. February 2016. “there was police patrolling all day and night doing nothing because there was so many hookers on my floor it was sickening.”¹⁹⁵
- g. September 2016: “the Inn is a whoretel that needs to be checked out by someone higher up in the chain.”¹⁹⁶
- h. July 2017. “I saw prostitutes and drug deals.”¹⁹⁷

183. Multiple Red Roof employees, including executives like Andrew Alexander and Marina MacDonald, regularly received these reviews.¹⁹⁸

184. Beginning in 2015, Red Roof examined its reviews for specific “chatter” related to possible criminal activity.¹⁹⁹

185. This was a project begun in the aftermath of Red Roof pulling its flag from a location in Charlotte, North Carolina, after federal law enforcement sought to forfeit the property because of criminal activity there, including sex trafficking.²⁰⁰

186. Red Roof, at the direction of then-general counsel George Limbert and with the help of Chief Marketing Officer Marina MacDonald, engaged its

¹⁹⁴ Buckhead Compilation (Ex. B) at 683 (RRI_WK_00005447).

¹⁹⁵ *Id.* at 777 (RRI_WK_00004994).

¹⁹⁶ Ex. 113 at 2.

¹⁹⁷ Buckhead Compilation (Ex. B) at 1113 (RRI_WK_00000660).

¹⁹⁸ MacDonald Dep. (Ex. 36) 103:10–104:20, 106:10–107:6; Alexander Dep. (Ex. 30) 39:6–12.

¹⁹⁹ MacDonald Dep. (Ex. 36) 128:4–19.

²⁰⁰ MacDonald Dep. (Ex. 36) 97:19–99:23; Stocker 30(b)(6) Dep. 180:6–21.

public relations firm to examine reviews “28 Key Words in 4 Categories” related to “Drugs,” “Police,” “Weapons,” and “Prostitution.”²⁰¹

187. The “Prostitution” category included specifically “Escort,” “Pimp,” “Hooker,” and “Whore.”²⁰²

188. The PR firm then created an “attention list” identifying the “[p]roperties with the most criminal chatter.”²⁰³

189. For the most inclusive period Red Roof examined, May through December 2015, the three properties with the most “chatter” were all in Atlanta.²⁰⁴

190. The Smyrna property was first, and its reviews had nearly twice as many references to prostitution as its next closest competitor.²⁰⁵

191. The Buckhead property was third.²⁰⁶

192. Though these reviews were “unverified,” Red Roof credited them enough to use them “to monitor chatter.”²⁰⁷

²⁰¹ Ex. 92 at 3 (RRI_WK_00005244).

²⁰² Ex. 92 at 3 (RRI_WK_00005244).

²⁰³ Ex. 92 at 9 (RRI_WK_00005250).

²⁰⁴ Ex. 151 at 10 (RRI_WK_00002853).

²⁰⁵ Ex. 151 at 10 (RRI_WK_00002853).

²⁰⁶ Ex. 151 at 10 (RRI_WK_00002853).

²⁰⁷ MacDonald Dep. (Ex. 36) 143:24–25.

III. Hotel staff showed pimps and prostitutes extraordinary hospitality, and this clientele rewarded Defendants with their loyalty and money.

193. Castille testified that he knowingly rented rooms to pimps and prostitutes throughout the time he worked at the Smyrna property.²⁰⁸

194. Castille worked at the Smyrna property from 2008-2016.²⁰⁹

A. Hotel employees actively assisted traffickers in multiple ways.

195. At both locations, testimony shows employees assisted traffickers by acting as lookouts.²¹⁰

196. Multiple Plaintiffs testified that Forrest Castille accepted money and drugs in exchange for helping traffickers by serving as a lookout.²¹¹

197. Jane Doe 2 testified that Forrest would call her trafficker, Ant, to alert him about police activity and then call later to let them know when they could start up again.²¹²

198. MM testified that she interacted with Forrest at least 20 times and that

²⁰⁸ Castille Dep. (Ex. 19) 71:3–14, 76:13–17, 131:2–10, 132:4–11.

²⁰⁹ Castille Dep. (Ex. 19) 17:15–18.

²¹⁰ JD2 Dep. Vol. 1 (Ex. 3) 45:15–46:19; JD2 Dep. 201:16–202:4; MM Dep. (Ex. 25) 21:10–21:21, 22:15–18, 270:2–270:15; RP Dep. 215:1–7, 297:24–298:23.

²¹¹ JD2 Dep. Vol. 1 (Ex. 3) 45:15–46:22; JD2 Dep. Vol. 1 201–202; MM Dep. (Ex. 25) 21:11–21.

²¹² JD2 Dep. Vol. 1 (Ex. 3) 201:16–202:9.

her trafficker paid him to serve as a lookout.²¹³

199. She also testified she “brought Forrest down weed before.”²¹⁴

200. Forrest confirmed that he took marijuana from men he knew to be pimps—sometimes in exchange for money and sometimes for free.²¹⁵

201. Jane Doe 2 testified that Forrest would offer traffickers discounts on rooms.²¹⁶

202. Vanessa Cole “determined” that a Smyrna property employee named Barry was renting rooms off the books, “without entering them in the reservation system and not accounting for the money.”²¹⁷

203. MM testified that Barry took money from her trafficker in exchange for serving as a lookout.²¹⁸

204. She explained the lookout role this way:

[W]hile he was at the room at any time, if police were on the property, they were going to call the room and say: Hey look the cops are here. Chill out for a minute. Whatever. Put your stuff away. ... Don't come outside. Spray your room down. ... They let him know everything.²¹⁹

205. Varahi owner, Bob Patel, admitted to placing a sign at the front desk

²¹³ MM Dep. (Ex. 25) 21:10–21.

²¹⁴ MM Dep. (Ex. 25) 270:7.

²¹⁵ Castille Dep. (Ex. 19) 142:4–11, 162:3–6.

²¹⁶ JD2 Dep. Vol. 1 (Ex. 3) 45:24–46:2.

²¹⁷ Cole Aff. (Ex. 62) ¶ 20.

²¹⁸ MM Dep. (Ex. 25) 22:15–18.

²¹⁹ MM Dep. (Ex. 25) 252:10–253:2.

that read, “No Refunds after 15 Minutes.”²²⁰

206. In 2017, Cobb police told Red Roof corporate employees including security director Greg Stocker and Vice President of Franchise Operations Vicki Lam that Bob Patel made “every effort he could to avoid” assisting police,²²¹ even after the location’s nuisance abatement notice.²²²

207. Cobb county police, in that 2017 email, also wrote, “One would think that in his position, he would desire to be more helpful.”²²³

208. Employees and Plaintiffs testified that workers at the Smyrna property set aside select areas of each hotel for sex workers, usually in the back of the building to help them avoid being spotted by law enforcement.²²⁴

209. As JD2 testified, the back was “where it would be easy not to be seen as much.”²²⁵

210. DP listened to a Smyrna Property security guard tell her trafficker about “where he could go [and] which rooms [were] good.”²²⁶

²²⁰ B. Patel Dep. (Ex. 17) 71:13–17; Lam Dep. (Ex.35) 229:18–230:13 (testifying to sign’s presence).

²²¹ Ex. 91 (RRI_WK_00002998).

²²² Ex. 88.

²²³ Ex. 91 (RRI_WK_00002998).

²²⁴ MB Dep. (Ex. 9) 190:11–191:10; JD4 Dep. (Ex. 6) 104:24–106:18; *see also* DP Dep. (Ex. 7) 42:22–43:11.

²²⁵ JD2 Dep. Vol. 1 (Ex. 3) 45:15–46:16.

²²⁶ DP Dep. (Ex. 7) 42:21–24.

211. At the Buckhead Property, RP testified that her traffickers relied on hotel staff to notify them if police were in the area.²²⁷

212. Monica Hamilton testified that at the Buckhead Property, the prostitution activity was concentrated “on the back side as well for the girls to take care of their business, so to speak.”²²⁸

213. Michael Thomas testified that as early as 2012, when he was working there, Jay Moyer told him to book suspected prostitutes in the back of the Buckhead Property, where they would be less visible to other guests.²²⁹

214. Thomas reported to Jay Moyer that the “head maintenance man at the property, has improper relations with” a guest “who is for a fact a prostitute.”²³⁰

215. And when Michael Thomas reported to Moyer guest complaints about “young girls” being sold for sex at Buckhead, Moyer suggested they be put in rooms on the backside of the hotel, away from the “family-oriented” guests who stayed in the rooms on the front side of the hotel.²³¹

216. At both locations, women recounted having sex with hotel employees

²²⁷ See, e.g., RP Dep. (Ex. 10) 215:1–7, 297:24–298:23.

²²⁸ Hamilton Dep. (Ex. 41) 87:24–88:1.

²²⁹ Thomas Dep. (Ex. 14) 45:14–48:10.

²³⁰ Moyer Dep. (Ex. 18) 258:16–259:23.

²³¹ Thomas Dep. (Ex. 14) 40:6–41:16.

for money their traffickers kept.²³²

217. After EH told two security guards at the Smyrna Property that she was having sex for money, one of them kept a lookout for her to warn her if police were around, and both paid her for sex.²³³

218. EH also had sex with a front desk employee at Smyrna.²³⁴

219. The man would give her a room key and have her meet him for commercial sex.²³⁵

220. And once, he—or someone who sounded like him and worked at the hotel—called her room to warn her about police activity in the area.²³⁶

221. RP described having sex with three Buckhead Property front desk workers, who paid her traffickers.²³⁷

222. MM testified, that the Smyrna Property was always “home base to go back to” “because that’s where” one of her traffickers “felt he was safe.”²³⁸

223. WK recalled that Smyrna Property staff was very friendly with her

²³² See, e.g., EH Dep. (Ex. 8) 130:8–131:25, 141:16–142:2 (Smyrna); RP Dep. (Ex. 10) 215:2–7, 297:24–298:23 (Buckhead).

²³³ EH Dep. (Ex. 8) 130:8–131:25, 141:16–142:2, 148:12–153:15, 157:19–24; RP Dep. (Ex. 10) 215:1–7, 297:24–298:23.

²³⁴ EH Dep. (Ex. 8) 148:12–153:15, 157:19–24.

²³⁵ EH Dep. (Ex. 8) 152:11–16.

²³⁶ EH Dep. (Ex. 8) 162:8–163:25.

²³⁷ RP Dep. (Ex. 10) 215:2–7, 297:24–298:23.

²³⁸ MM Dep. (Ex. 25) 230:19–22.

trafficker and would even buy drugs from him.²³⁹

224. At the Buckhead Property, both RK and TH recounted how, in between flagrantly selling his victims for sex, their shared trafficker would socialize with employees.²⁴⁰

225. They testified Bagz was “very familiar” with the workers at Buckhead and would say to them things like, “appreciate you.”²⁴¹

226. TH also testified that Bagz, her trafficker, stayed at the hotels most of the time with RK and TH.²⁴²

227. TH testified about her trafficker at Buckhead that, “[h]e’d just flaunt it.”²⁴³

228. RK recalls how, at some hotels, the trafficker wouldn’t even get out of the car, but at Buckhead, “he would not only go inside and pay for the room when we’d first get to the hotel,” he would also “hang out in the parking lots of these hotels with other pimps.”²⁴⁴

229. TH testified “Bagz seemed really comfortable there,” referring to the

²³⁹ WK Resp. to ROG (Ex. 69) at 21.

²⁴⁰ RK Dep. (Ex. 22) 270:11–21; *see also* TH Dep. (Ex. 23) 273:5–10, 278:18–19.

²⁴¹ RK Dep. (Ex. 22) 270:11–21; *see also* TH Dep. (Ex. 23) 273:5–10, 278:18–19.

²⁴² TH Dep. (Ex. 23) 273:5–10.

²⁴³ TH Dep. (Ex. 23) 286:12–13.

²⁴⁴ RK Dep. (Ex. 22) 269:1–14.

Buckhead location.²⁴⁵

230. TH testified that “[a]ll the pimps would hang out there” and would “often blare music outside.”²⁴⁶

231. One trafficker also smoked with the prostitutes in the parking lot.²⁴⁷

B. Defendants operated the Smyrna and Buckhead Properties to maximize revenue from prostitution.

232. Vanessa Cole testified that when she raised concerns about prostitution to Regional Vice President Jay Moyer, he said, “yes, we understand we have to, you know, clean up the place, but we also need to sell rooms.”²⁴⁸

233. Later, Bob Patel responded to an employee’s report that Varahi “[was] allowing too many prostitutes to stay here” not by telling them to leave, but by suggesting that prostitutes “stay in [their] room.”²⁴⁹

234. Forrest Castille testified similarly that conversations were “never ever ... about prostitution” but “about revenue and trying to keep the customers happy.”²⁵⁰

²⁴⁵ TH Dep. (Ex. 23) 278:18–279:3.

²⁴⁶ TH Dep. (Ex. 23) 278:18–279:3.

²⁴⁷ RK Dep. (Ex. 22) 269:7–14; TH Dep. (Ex. 23) 278:21–23.

²⁴⁸ Cole Dep. (Ex. 15) 27:3–5.

²⁴⁹ B. Patel Dep. Ex. 268 (Ex. 17).

²⁵⁰ Castille Dep. (Ex. 19) 47:8–14.

235. He testified those conversations were “the only training [he] had.”²⁵¹

236. Tom McElroy is a former safety and security director charged with responsibility for Red Roof’s corporately managed locations.²⁵²

237. McElroy testified to his perception that the company—and Jay Moyer specifically—prioritized revenue over safety and security.²⁵³

238. McElroy testified that there was no security budget during his 2013 tenure.²⁵⁴

239. Greg Stocker testified that the 2022 budget was \$20,000 a year.²⁵⁵

240. By comparison, in 2018, Red Roof’s marketing budget was “roughly 10–13 million.”²⁵⁶

241. Red Roof’s financial 30(b)(6) designee confirmed that the Smyrna Property was a “top performer” within the system.²⁵⁷

242. And the Buckhead Property, too, outpaced its peers during the entire period for which Red Roof had financial data.²⁵⁸

²⁵¹ Castille Dep. (Ex. 19) 47:8–14.

²⁵² McElroy Dep. (Ex. 44) 136:24–137:4.

²⁵³ McElroy Dep. (Ex. 44) at 55:10–55:20.

²⁵⁴ McElroy Dep. (Ex. 44) 48:19–24.

²⁵⁵ Stocker Dep. (Ex. 28) 23:14–24

²⁵⁶ McDonald Dep. (Ex. 36) 56:17–25.

²⁵⁷ Park 30(b)(6) (Ex. 34) 92:11–93:1; Ex. 339 (WHM_WK_000076, WHM_WK_00083).

²⁵⁸ Park 30(b)(6) (Ex. 34) Dep. 92:20–93:5.

243. Indeed, all Defendants benefited from their emphasis on revenue at the expense of safety and security.²⁵⁹

244. The Buckhead Property was owned by Defendant RRI III during all of the relevant time (2010-2018).²⁶⁰

245. Defendant RRI West collected a management fee derived from gross room revenue at the Buckhead Property during this time.²⁶¹

246. At the Smyrna Property, Defendant RRI West collected the same revenue-based fees during the time Defendant FMW RRI NC owned the hotel and until Varahi purchased the property in December 14, 2012.²⁶²

247. Once Varahi became the franchisee, Defendant Red Roof Franchising began collecting fees, including fees based on gross room revenues.²⁶³

248. Defendant Red Roof Inns, Inc., in turn, earned revenue from those same fees Red Roof Franchising collected.²⁶⁴

249. Employees at both locations testified that they did not receive any

²⁵⁹ Park 30(b)(6) Dep. (Ex. 34) 47:10-17, 55:8-22; 84:6-13; 84:23-85:5; B. Patel Exhibit 333.

²⁶⁰ Park 30(b)(6) Dep. (Ex. 34) 47:10-17, 55:8-22.

²⁶¹ Park 30(b)(6) Dep. (Ex. 34) 55:8-22, 84:6-13.

²⁶² B. Patel Dep. (Ex. 17) Exhibit 333; Park 30(b)(6) Dep. 84:6-13.

²⁶³ B. Patel Dep. (Ex. 17) 176:18-177:4.

²⁶⁴ Park 30(b)(6) Dep. (Ex. 34) 84:23-85:8.

training on safety and security, prostitution, or sex trafficking.²⁶⁵

250. Michael Thomas, for example, who worked as a housekeeper and front desk employee at Buckhead²⁶⁶ testified that he received no training on guest safety, no training on identifying or preventing crime, and no training on identifying or addressing prostitution or sex trafficking.²⁶⁷

251. Forrest Castille, who worked for both Red Roof Inns, Inc. and Varahi, likewise testified that he “never” received training of any sort on safety and security or prostitution.²⁶⁸

252. Again, none of the location employees deposed in this case ever received any training, but in August 2014, Red Roof began offering a webinar it developed called “Preventing & Reacting to Child Sex Trafficking.”²⁶⁹

253. The training was available only to general managers and was not required at franchised locations.²⁷⁰

254. By January 2015, it was offered to other location employees, but still

²⁶⁵ Conner Aff. (Ex.67) ¶ 18; Conner Dep. (Ex. 40) 28:9–18; Thomas Dep. (Ex. 14) 24:10–25:17.

²⁶⁶ Thomas Dep. (Ex. 14) 14:24–15:5.

²⁶⁷ Thomas Dep. (Ex. 14) 24:10–25:17.

²⁶⁸ Castille Dep. (Ex. 19) 117:8–13.

²⁶⁹ Ex. 168 at 25 (RRI_WK_00001150); Ex. 146 at 25; Werhle 30(b)(6) Dep. (Ex. 42) 114:5–7.

²⁷⁰ Wehrle 30(b)(6) Dep. (Ex. 42) 118:16–119:3.

was not required for franchise-location employees.²⁷¹

255. At no time was sex trafficking training offered in Spanish or any language other than English.²⁷²

256. Not offering sex trafficking training in Spanish or other languages is something hotel industry expert Alan Tallis characterized as “a failure,” as “[t]he lodging industry provides employment opportunities for immigrants, many of whom do not have, as of the item of employment, a firm command of the English language. Owners and operators must therefore adopt viable, repetitive training programs to account for the limitations of the employment base.”²⁷³

257. And as Tallis testified, “the anti-sex trafficking ‘policy’ for the Red Roof brand was functionally indistinguishable from its (eventual) training on the topic. The essence was, ‘If you see something, say something.’ But if the ‘sex trafficking training’ was the sex trafficking policy, there was no policy.”²⁷⁴

258. Tallis opined that “[a] policy would by necessity provide parameters and instructions to line employees and their superiors indicating what to do when they ‘see something,’” but Red Roof offered nothing “describe[ing] what to do and

²⁷¹ Wehrle 30(b)(6) Dep. (Ex. 42) at 119:4–13.

²⁷² Wehrle 30(b)(6) Dep. (Ex. 42) at 132:22–133:17.

²⁷³ Tallis Report at 22.

²⁷⁴ Tallis Report at 26 (citing 2022-04-27 Limbert Dep. 84:9–10 (“[The] policies and procedures of Red Roof Inn, again, I will refer you to the training.”) and quoting 2022-04-27 Limbert Dep. at 85:4–10).

how to do it” “beyond an annual webinar.”²⁷⁵

259. But the “Preventing & Reacting to Child Sex Trafficking” webinar demonstrated that the Red Roof Inn Defendants knew the signs of a trafficker, including, for example, (1) “Pays in cash for one day at a time”; (2) “Escorts various men into the room and lingers until they leave, watching the door; (3) “Seen with a group of women”; (4) “Does not leave the victim alone, calls often”; and (5) “Controls all or most money and identification.”²⁷⁶

260. For nearly half the time Plaintiffs were trafficked at these locations, the Red Roof brand had no corporate employee dedicated to safety and security.²⁷⁷

261. For the almost 7 year period from November 2010 to May 2017, the safety and security director position at Red Roof corporate was filled for just one year—by Tom McElroy in 2013—and was otherwise vacant.²⁷⁸

262. Tallis characterized this vacancy as “highly unusual for a system as large as Red Roof.”²⁷⁹

263. He explained that “[w]ithout a dedicated safety and security officer,

²⁷⁵ Tallis Report at 26.

²⁷⁶ Ex. 168 at 26; Ex. 146 at 25.

²⁷⁷ Tallis Report at 2; Vittatoe Dep. (Ex. 43) 37:16–18, 120:20–22; McElroy Dep. (Ex. 44) 17:7–9; Limbert Dep. (Ex. 31) 273:2–274:1.

²⁷⁸ Tallis Report at 2; Vittatoe Dep. (Ex. 43) 37:16–18, 120:20–22; McElroy Dep. (Ex. 44) 17:7–9; Limbert Dep. (Ex. 31) 273:2–23.

²⁷⁹ Tallis Report at 27.

there was no designated employee to monitor and respond to criminal activity at any Red Roof property.”²⁸⁰

264. Though the properties maintained so-called “Do Not Rent” or “DNR” lists at the location level, employees at both the Smyrna and Buckhead Properties ignored them.²⁸¹

265. Brenda Conner testified, for example, that Forrest Castille and Bob Patel allowed guests on the DNR list to continue to rent rooms at the Smyrna Property.²⁸² This included Anthony Shivers.²⁸³

266. Michael Thomas testified that he would place guests on the DNR at the Buckhead Property, only to see them return because it was at the “manager’s discretion as to if they’re going to rent to them or not.”²⁸⁴

267. Monica Hamilton, the Buckhead Property security guard, also testified to staff renting to guests even after the guests were removed from the property.²⁸⁵

²⁸⁰ Tallis Report at 27.

²⁸¹ Conner Dep. (Ex. 40) 61:22–62:14; Thomas Dep. (Ex. 14) 96:7–97:24; Hamilton Dep. (Ex. 41) 143:1–144:9.

²⁸² Conner Dep. (Ex. 40) 61:22–62:14.

²⁸³ Conner Dep. (Ex. 40) 61:22–62:14.

²⁸⁴ Thomas Dep. (Ex. 14) 96:22–97:15.

²⁸⁵ Hamilton Dep. (Ex. 41) 143:1–144:9.

IV. Corporate employees also had direct knowledge of the prostitution and trafficking at the Smyrna and Buckhead Red Roof Inns.

A. Even after a human trafficking activist told Red Roof’s C-Suite executives about the conditions at Smyrna, conditions got worse.

268. In 2011, before the Smyrna Property was sold to Varahi, internal Red Roof documents reported that the “area is increasingly seeing S&S [safety security] issues,” including specifically “drugs and prostitution.”²⁸⁶

269. By 2012, emails show Vanessa Cole described Atlanta as a “hot spot” when reporting an incident involving prostitution at the Smyrna Property to her supervisor, Jay Moyer.²⁸⁷

270. In December 2015, Michele Sarkisian, reached out to then-Red Roof President, Andy Alexander, with the help of an industry contact and a “warm introduction.”²⁸⁸

271. Michelle Sarkisian is a “recognized hotel industry expert”²⁸⁹ and former ECPAT board member.²⁹⁰

272. Sarkisian called Alexander on December 4, 2015.²⁹¹

²⁸⁶ Ex. 147 at 58, 60 (RRI_WK_00002445, 2447).

²⁸⁷ Ex. 124 (RRI_WK_00048239).

²⁸⁸ Sarkisian Dep. (Ex. 29) 24:5–14.

²⁸⁹ Expert Report of Alan Tallis (Ex. 140) at 14.

²⁹⁰ Sarkisian Dep. (Ex. 29) 19:6–10.

²⁹¹ Sarkisian Dep. (Ex. 29) 24:15–26:11; Sarkisian Aff. (Ex. 66) ¶¶ 3–9, Pltf-RRI0006217.

273. She specifically identified, by name, Anthony “Ant” Shivers, reported (correctly) that Shivers was living in the manager’s apartment at Smyrna, and told Alexander that “Shivers was trafficking women” there.²⁹²

274. Sarkisian followed up with Mr. Alexander several times but never heard from him.²⁹³

275. Sarkisian did hear from then-general counsel, George Limbert, but Limbert was interested only in where Sarkisian got her information.²⁹⁴

276. Limbert’s testimony confirmed that because Sarkisian provided only “unverified information” and would not identify her source, the company did not credit her.²⁹⁵

277. Red Roof has produced no information about what it did in response to Sarkisian’s report, instead claiming attorney client privilege and work product protect their actions.²⁹⁶

278. Citing specific arrests on the property in 2016 and 14 citations or arrests “in the previous 12 months,” Cobb County sent Varahi a nuisance

²⁹² Sarkisian Aff. (Ex. 66) Pltf-RRI0006217 ¶¶ 7–8; Sarkisian Dep. (Ex. 29) 24:16–20.

²⁹³ Sarkisian Dep. (Ex. 29) 32:1–5.

²⁹⁴ Sarkisian Dep. (Ex. 29) 32: 5–10.

²⁹⁵ Limbert Dep. (Ex. 31) 199:10–13.

²⁹⁶ Limbert Dep. (Ex. 31) 213:1–19.

abatement notice in April 2017.²⁹⁷

279. The Smyrna Property was subject to a nuisance abatement plan.²⁹⁸

280. By August 2017, Cobb police reached out to Vickie Lam, the franchise operations director responsible for the Smyrna Property,²⁹⁹ continuing to have concerns about the property.³⁰⁰

281. Though there was a nuisance abatement plan in place and at least one meeting with Cobb County officials occurred, the Red Roof Defendants' 30(b)(6) designee on this topic could not testify to the terms of the abatement plan, how many meetings occurred, or what occurred in those meetings.³⁰¹

282. George Limbert testified that it was his position the only way to have personal knowledge that sex trafficking is occurring is by witnessing the sex act.³⁰²

B. A Red Roof Regional Vice President “joked” about “pimps and hos” at North Druid Hills.

283. In 2013, Jay Moyer, the Regional Vice President of Operations charged with managing both the Smyrna Property when it was corporately operated and the Buckhead Property during the entire relevant time period, was

²⁹⁷ Ex. 88.

²⁹⁸ Stocker 30(b)(6) Dep. (Ex. 26) 173:4–10.

²⁹⁹ Ex. 89; Ex. 91

³⁰⁰ Stocker 30(b)(6) Dep. (Ex. 26) 190:8–10.

³⁰¹ Stocker 30(b)(6) Dep. (Ex. 26) 186:23–189:11, 190:21–191:19, 204:11–205:7.

³⁰² Limbert Dep. (Ex. 31) 321:20–25.

“frustrated” with the Buckhead Inn’s transition to a so-called “Plus+” property.³⁰³

284. Plus+ properties offered upgraded amenities, “from bath towels to providing a snackbox in the room to having, you know, wood-like flooring.”³⁰⁴

285. Concerned that the Buckhead Property “would have a challenging time meeting the company expectations” for Plus+ properties,³⁰⁵ Moyer wrote,³⁰⁶

“well Mr. Moyer...what can you tell me about taking the Buckhead location to Plus++++Plus status??? I’m going to say that my pimps and ho’s love them some snacks to go with their smokes”

286. Red Roof characterizes this as a “poor choice of words” on Moyer’s part.³⁰⁷ But even if a jury accepted Moyer’s explanation, it would still confirm that Moyer, a Vice President for Defendant Red Roof Inns, Inc.,³⁰⁸ was aware that the Buckhead Property regularly rented rooms to suspected prostitutes and pimps.

287. In December 2015, a general manager explained a guest complaint by saying, “This is a local guest that has male prostitute coming in out of the room.”³⁰⁹

288. In April 2015, when a woman called the customer service hotline and

³⁰³ Moyer Dep. (Ex. 18) 212:15.

³⁰⁴ Moyer Dep. (Ex. 18) 87:12–17.

³⁰⁵ Moyer Dep. (Ex. 18) 97:15–19.

³⁰⁶ Ex. 95 (RRI_WK_0004955); Moyer Dep. (Ex. 18) 209:23–210:5.

³⁰⁷ See, e.g., *Jane Does 1–4 v. Red Roof Inns, Inc., et al.* Doc. 148-1 at 6 n.2; *WK, et al. v. Red Roof Inns, Inc., et al.*, Doc. 270-1 at 5, n.4.

³⁰⁸ Ex. 110 at 1–2 (RRI_EF_00007425-26).

³⁰⁹ Ex. 138 at 2.

reported that her husband engaged an underage prostitute at the location using Backpage, Moyer told the location manager only, “tread carefully on something [like] this. Let me know if you need help.”³¹⁰

289. In October 2012, Michael Thomas told Moyer:

our property has a high prostitution rate and although we try to curtail this [the general manager] prefers revenue so when people that we know for a fact are prostitutes or are on the do not rent list even in some cases [the general manager] will let them still rent rooms she says its at her discretion.³¹¹

290. Though Moyer responded to other statements in this email, like those regarding timing goals for housekeepers, he offered no response to the above statement.³¹²

291. In August 2012, after a manager reported “[throwing] a few more prostitutes off the property last night,” Moyer cautioned that they should only remove guests if they “KNOW that someone is soliciting.”³¹³

292. The same day Moyer referred to “pimps and hos” at the Buckhead Property—he used “local cliental” as a euphemism for “prostitution and drug dealers” and encouraged others, or himself, to use “local cliental or challenging

³¹⁰ Ex. 117.

³¹¹ Ex. 93.

³¹² Ex. 93.

³¹³ Ex. 118; *see also* Moyer Dep. (Ex. 18) 228:21–22 (identifying sender as manager).

cliental instead” of “prostitution and drug dealers.”³¹⁴

293. Elsewhere, Moyer described Buckhead as a “challenging and high volume property”³¹⁵ and linked those “challenge[s]” to, among other things, “local clientele or transient clientele.”³¹⁶

C. Sex trafficking, not just prostitution, was a problem known to the hotel industry and to Red Roof.

294. Allen Tallis testified “the hotel industry was aware by the early 2000s that human trafficking posed a significant problem” in the industry.³¹⁷

295. By 2004, ECPAT—an international anti-trafficking organization—had promulgated its Code of Conduct for the Protection of Children from Sex Exploitation in Travel and Tourism, commonly known as “the Code.”³¹⁸

296. Carlson Hotels Worldwide signed the Code that year.³¹⁹

297. By 2006, industry publications were discussing hotels’ role in fighting human trafficking.³²⁰

298. In 2010, the Department of Homeland Security launched a national public awareness campaign designed to educate “industry partners,” among others,

³¹⁴ Ex. 110 at 1–2 (RRI_EF_00007425-26).

³¹⁵ Ex. 171 at 1, 3 (RRI 00001117, 000119).

³¹⁶ Moyer Dep. (Ex. 18) 102:4–7.

³¹⁷ Expert Report of Alan Tallis (Ex. 140) at 7.

³¹⁸ *Id.*

³¹⁹ *Id.* at 8.

³²⁰ *Id.* at 8.

“to recognize the indicators of human trafficking and how to appropriately respond to possible cases.”³²¹

299. In September 2011, training offered by the American Hotel and Lodging Association (AHLA) to its members for “security officers and other employees who perform security functions at a property” included training on “Child trafficking/protection of children.”³²²

300. In 2012, AHLA launched a training video on “Human Trafficking Awareness” available to the public to “help associates identify suspicious activity and provide them with instructions on how to proceed with their suspicions.”³²³

301. That trafficking was a known problem in the industry was also a fact known to Red Roof.³²⁴

302. In March 2012, Red Roof distributed anti-trafficking flyers produced by the Department of Homeland Security to its properties, including franchised locations, and requested that they post them “in the break room of their

³²¹ *Id.* at 8 (quoting Press Release, Secretary Napolitano Launches First of Its Kind Campaign to Combat Human Trafficking, U.S. Dep’t of Homeland Security (July 22, 2010), <https://www.dhs.gov/news/2010/07/22/secretary-napolitano-launches-first-its-kind-campaign-combat-human-trafficking>).

³²² *Id.* at 20 (quoting <https://www.hospitalitynet.org/news/4053008.html>).

³²³ *Id.* at 20–21 (quoting <https://www.ahlei.org/product/human-trafficking-dvd/>).

³²⁴ Ex. 87 at 11 (RRI_WK_00038065).

propert[ies].”³²⁵

303. Testimony shows these flyers were posted specifically in the breakrooms at the Smyrna and Buckhead Properties.³²⁶

304. By July 2012, then-Red Roof President Andy Alexander had received an invitation to a hospitality law conference including a session from ECPAT titled “Mitigating Human Trafficking.”³²⁷

305. A number of other industry and other publications Alexander received that year also discussed hotels’ role in human trafficking.³²⁸

306. And there were arrests reported to Alexander—including by his own wife—of human trafficking arrests at Red Roof Hotels that same year.³²⁹

307. The Red Roof Defendants’ 30(b)(6) representative on security topics, Greg Stocker, testified that Red Roof has known since at least 2010 that prostitution and sex trafficking share indicators, including a large number of

³²⁵ Ex. 87 at 11 (RRI_WK_00038065).

³²⁶ Moyer Dep. (Ex. 18) 169:7–17.

³²⁷ Ex. 85 (RRI_WK_00020970).

³²⁸ Ex. 148 at 1 (RRI_WK_00050853–57) (“Hotel & Lodging Executive Briefing”); Ex. 116 at 1 (RRI_WK_00005966) (“recap” of February 2012 “Greater Columbus Lodging Council Meeting,” at which a Department of Homeland Security representative spoke about hotels’ efforts “to prevent human trafficking”); Ex. 83 at 2 (RRI_WK_00005965) (“Calfee Report on Ohio Government,” reporting on then-Governor John Kasich’s State of the State address, announcing a “focus[] on eliminating human trafficking”).

³²⁹ Ex. 84 at 1–5 (RRI_WK_00020959–63); Ex. 86 at 4 (RRI_WK_00034397).

condoms in a room, scantily clad women loitering, and heavy foot traffic in and out of rooms, with visitors staying for only short periods.³³⁰

308. No fewer than four Red Roof corporate employees testified that sex trafficking and prostitution have common indicators and are difficult to distinguish.³³¹

309. Red Roof had also experienced sex trafficking arrests at other properties around the country.³³²

310. This included two reports of trafficking at Red Roof properties in 2013, two in 2014, one in 2015, two in 2016, one in 2017, and one in 2018.³³³

311. Public relations firm H+K, working on behalf of the Red Roof brand, circulated weekly press reports to Marina MacDonald and other marketing staff.³³⁴

312. Marina McDonald was an employee of Defendant Red Roof

³³⁰ Stocker 30(b)(6) Dep. (Ex. 26) 36:25–39:15.

³³¹ McElroy Dep. (Ex. 44) 26:24–28:9; Limbert Dep. (Ex. 30) 80:3–24; Stocker 30(b)(6) Dep. (Ex. 26) 36:25–39:15; Vittatoe Dep. (Ex. 43) 83:14–20.

³³² Ex. 125 at 4 (RRI_WK_00013151) (Sept. 2013); Ex. 126 (RRI_WK_00013153-55) (Oct. 2013); Ex. 127 (RRI_00013667) (Apr. 2014); Ex. 128 (RRI_00012069-70) (Jun. 2014); Ex. 129 (RRI_WK_00015681-82) (Oct. 2015); Ex. 128 at 7 (RRI_WK_00015986) (Jan. 2016), Ex. 131 (RRI_WK_00018256) (May 2016); Ex. 132 at 8 (RRI_WK_00065400) (Jan. 2017); Ex. 133 at 3 (RRI_WK_00035223) (Jul. 2018).

³³³ *Id.*

³³⁴ MacDonald Dep. (Ex. 45) 218:24–221:14.

Franchising, LLC.³³⁵

313. MacDonald testified that she “worked for the entire brand,” and her work did not distinguish between corporately owned and independently franchised properties.³³⁶

314. Those reports aggregated positive and negative press.³³⁷

315. No fewer than 9 times over 5 years, they mentioned human trafficking activity at Red Roof hotels.³³⁸

316. In addition, MacDonald received Google alerts reporting another 4 incidents of human trafficking at Red Roof locations within the same timeframe.³³⁹

³³⁵ MacDonald Dep. (Ex. 45) 57:19–23.

³³⁶ MacDonald Dep. (Ex. 45) 46:7, 59:14–21.

³³⁷ MacDonald Dep. (Ex. 45) 218:18–23.

³³⁸ In the examples listed here and discussed above, the mention of forced commercial sex appeared in the face of the H+K report, as opposed to in the linked news story. Ex. 125 at 4 (RRI_WK_00013151) (Sept. 2013), Ex. 126 (RRI_WK_00013153-55); Ex. 127 (RRI_00013667) (Apr. 2014); Ex. 128 (RRI_00012069-70) (Jun. 2014); Ex. 129 (RRI_WK_00015681-82)(Oct. 2015); Ex. 130 at 7 (RRI_WK_00015986) (Jan. 2016), Ex. 131 (RRI_WK_00018256) (May 2016); Ex. 132 at 8 (RRI_WK_00065400) (Jan. 2017); Ex. 133 at 3 (RRI_WK_00035223) (Jul. 2018).

³³⁹ Ex. 134 (RRI_WK_00014215) (Nov. 2014); Ex. 135 (RRI_WK_00016329) (Aug. 2016); Ex. 136 (RRI_WK_00065387-88) (Dec. 2016); Ex. 137 (RRI_WK_00035083-84) (Jan. 2018).

V. Plaintiffs were victims of sex trafficking at the Red Roof hotels.

A. The PIVIP gang and other trafficking organizations had continuous, sustained business relationships with the Red Roof hotels.

317. A gang of traffickers called PIVIP, which stood for Pimps in Very Important Places, repeatedly brought plaintiffs to the Red Roof Inn hotels.³⁴⁰

318. The PIVIP traffickers included Bagz, CB, Diablo, Crum, Anthony Shivers, and Kwan.³⁴¹

319. The PIVIP gang “would pass the girls around” and make them wear PIVIP branded shirts.³⁴²

320. PIVIP traffickers would not allow their traffickers to look others in the eye and instead, the victims had to “keep [their] heads down.”³⁴³

321. As Jane Doe 1 explained, “We weren’t allowed to look past the chin.”³⁴⁴ At both hotels, the traffickers required her to keep head down and “look

³⁴⁰ JD2 Dep. Vol. 1 (Ex. 3) 24:20-24; RK Dep. (Ex. 22) 223:16–20.

³⁴¹ PIVIP trafficked Jane Does 1– 4 and C.A., K.P., R.K., and T.H. at the Red Roof Inn hotels. JD1 Dep. Vol. 1 (Ex. 1) 155:1-16; JD2 Vol. 1 Dep. (Ex. 3) 24:5-19; 28:3-8); KP Dep. (Ex. 16) 220:21–221:1; JD3 Dep. (Ex. 5) 19:19–25, 291:15–17; JD4 Dep. (Ex. 6) 20:18-21:20; CA Dep. Vol. 1 (Ex. 20) 39:6-15; RK Dep. (Ex. 22) 254:21-255:7; TH Dep. Tr. 18:3-12.

³⁴² JD2 Dep. Vol. 1 (Ex. 3) 38:13-22 (pass the girls around), JD2 Dep. Vol. 2 (Ex. 4) 267:15-268:3 (branded shirts); JD1 Dep. Vol. 1 (Ex. 1) 154:5–25.

³⁴³ RK Dep. (Ex. 22) 37:20–23; *see also* KP Dep. (Ex. 16) 36:18–22.

³⁴⁴ JD1 Dep. Vol. 1 (Ex. 1) 263:10-13.

straight at the ground”³⁴⁵

322. Jane Doe 1, who was trafficked by this gang from late 2012 through early 2017, explained how her traffickers liked the Red Roof Smyrna and Buckhead most because they saw them “as being safer”; indeed, most of the time, someone at the front desk or other staff at the hotel would notify them when police were on the property.³⁴⁶

323. And Jane Doe 2 explained how PIVIP preferred going to the Smyrna and Buckhead Red Roof hotels because “[t]hey knew they could get away with committing those crimes.”³⁴⁷

324. Jane Doe 2 understood that PIVIP “either had connections there at [the Red Roof Inn hotels] or it was just so wide open that they knew they wouldn’t get in trouble or they would be warned of police enforcement first.”³⁴⁸

325. One of the main PIVIP traffickers, Bagz, who trafficked CA, RK, TH, Jane Doe 1 and Jane Doe 3, frequented the Buckhead location in particular because

³⁴⁵ JD2 Dep. Vol. 1 (Ex. 3) at 202:21–203:8; JD2 Vol. 2 (Ex. 4) 291:17-21.

³⁴⁶ JD1 Dep. Vol. 1 (Ex. 1) 259:23–261:7 (testifying generally about the Red Roof hotels and then specifically about the Smyrna hotel); JD1 Dep. Vol. 2 (Ex. 2) 299:1-5 (Buckhead).

³⁴⁷ JD2 Dep. Vol. 1 (Ex. 3) 122:3-4.

³⁴⁸ JD2 Dep. Vol. 1 (Ex. 3) 122:6-12.

it was where he “seemed most comfortable.”³⁴⁹

326. He was “very familiar” with the workers at Buckhead, saying things like “appreciate you” to them when he was there.³⁵⁰ “He’d just flaunt it,” TH testified.³⁵¹

B. Plaintiffs were trafficked at the Red Roof Inn hotels.

1. Jane Doe 1 (Smyrna and Buckhead, 2011 to 2016)

327. The PIVIP gang of traffickers, including Kwan, CB, Bagz, Crum, and Anthony Shivers, forced Jane Doe 1 to engage in sex for money repeatedly at the two Red Roof Inn hotels from about the end of 2012 through January of 2017.³⁵²

328. The PIVIP gang exploited Jane Doe 1’s drug addiction and used force or threats of force to cause her to engage in commercial sex.³⁵³

329. Jane Doe 1’s first PIVIP trafficker was CB. He found Jane Doe 1

³⁴⁹ TH Dep. (Ex. 23) 130:4–18, *id.* 161:25–162:9; RK Dep. (Ex. 22) 257:16–19, *see also* JD2 Dep. Vol. 1 (Ex. 3) 187:25–188:5, 198:7–199:8; JD3 Dep. (Ex. 5) 19:19–24 (testifying that she was trafficked by Bagz).

³⁵⁰ RK Dep. (Ex. 22) 270:11–21; *see also* TH Dep. (Ex. 23) 273:5–10 (Bagz stayed at the hotels most of the time with RK and TH); TH Dep. (Ex. 23) 278:18–19 (Bagz seemed very comfortable there).

³⁵¹ TH Dep. (Ex. 23) 286:12–13.

³⁵² JD1 Dep. Vol. 1 (Ex. 1), 9:4–10, 14:6–9, 40:22–41:13, 230:12–231:22, 51:10–11 (“[W]e all worked with PIVIP.”), 79:1–11, 229:17–231:22.

³⁵³ JD1 Dep. Vol. 1 (Ex. 1) 62:18–63:20, 114:9–11, 134:14–23, 137:17–138:17, 250:4–15; JD1 Dep. Vol. 2 (Ex. 2) 330:16–19; *see also* JD2 Dep. Vol. 1 (Ex. 3) 63:4–16 (“[T]raffickers would take our vulnerability and just control us with our addiction.”).

wandering along the side of the road, desperate for a heroin fix.³⁵⁴

330. This was just the type of victim CB preyed upon.³⁵⁵

331. He and the other traffickers supplied her and others like her with heroin and used their drug addiction to control them.³⁵⁶

332. As Jane Doe 2 explained, the PIVIP traffickers would exploit their withdrawal symptoms “to make [them] do what they wanted.”³⁵⁷

333. They would give Jane Doe 1 and other drug-addicted victims “drugs, bags at a time.”³⁵⁸

334. And the traffickers would even mix heroin with meth without telling the victims so they would stay awake and keep working.³⁵⁹

³⁵⁴ JD1 Dep. Vol. 1 (Ex. 1) 114:9–11 (testifying that she was regularly using opiates or heroine), 134:14–23 (testifying how CB picked her up on the street when she was drug addicted and looking for drugs).

³⁵⁵ *See, e.g.*, JD2 Dep. Vol. 1 (Ex. 3) 63:2–64:21 (describing how CB used drug addiction to control the girls, detailing a beating).

³⁵⁶ JD1 Dep. Vol. 1 (Ex. 1) 284:13–17 (testifying that the traffickers gave her bags and bags of heroin); JD2 Dep. Vol. 1 (Ex. 3) 68:8–24 (testifying that the traffickers made JD2 do what they wanted by exploiting drug addiction), 63:4–16 (testifying how traffickers used drugs to control their PIVIP victims).

³⁵⁷ JD2 Dep. Vol. 1 (Ex. 3) 68:8–24 (testifying that the traffickers made JD2 do what they wanted by exploiting drug addiction), 63:4–16 (same).

³⁵⁸ JD1 Dep. Vol. 1 (Ex. 1) 284:13–17.

³⁵⁹ JD1 Dep. Vol. 1 (Ex. 1) 256:19–257:3 (testifying how traffickers would mix meth into the victims’ drugs and not tell them so they wouldn’t sleep): 284:13–17.

335. The traffickers also used brute force to keep Jane Doe 1 in line.³⁶⁰

336. CB was possibly the most ruthless with Jane Doe 1 calling him her “main abuser” and saying he was “very brutal.”³⁶¹

337. “He would rape us. He would beat us. He didn’t care what he did to us. We did not matter to him,” she testified.³⁶²

338. She was beaten so bad once that her eyes were swollen shut.³⁶³

339. CB “took the cake,” but Jane Doe 1 testified that the PIVIP pimps “were all violent.”³⁶⁴

340. Jane Doe 1 also testified how she “was under surveillance” by her traffickers.³⁶⁵

341. She was forced to follow their rules, including the rule that she could not talk to others or even look them in the eyes. “We weren’t allowed to look past the chin,” she testified.³⁶⁶

342. Jane Doe 1 was forced to have sex for money more often at the Red Roof hotels than elsewhere. “[T]hose two hotels were the ones we frequented

³⁶⁰ JD1 Dep. Vol. 1 (Ex. 1) 137:22–24; JD1 Dep. Vol. 1 (Ex. 1) 62:18–63:22, 137:10–139.

³⁶¹ JD1 Dep. Vol. 1 (Ex. 1) 137:22–24.

³⁶² JD1 Dep. Vol. 1 (Ex. 1) 137:14–24.

³⁶³ JD1 Dep. Vol. 1 (Ex. 1) 211:1–12.

³⁶⁴ JD1 Dep. Vol. 1 (Ex. 1) 62:18–63:22, 137:10–139.

³⁶⁵ JD1 Dep. Vol. 1 (Ex. 1) 62:8–10.

³⁶⁶ JD1 Dep. Vol. 1 (Ex. 1) 263:9–13.

monthly, if not weekly. Every month of every year, we were at ... [o]ne of those two [hotels].”³⁶⁷

343. And her stays at these hotels ranged from a single day at a time to a month or more.³⁶⁸

344. She explained that her traffickers liked Red Roof Smyrna and Buckhead most because they saw them “as being safer”; most of the time, someone at the front desk or other staff at the hotel would notify them when police were on the property.³⁶⁹

345. Jane Doe 1 testified that she would have dressed provocatively at these hotels, “looking like a slut.”³⁷⁰

346. There were also “handfuls of condoms in the trash,” “[l]arge amounts. Over 10.”³⁷¹

347. Jane Doe 1 requested “extra sheets and towels,” like “four, five, six extra sheets up to eight extra towels.”³⁷²

³⁶⁷ JD1 Dep. Vol. 1 (Ex. 1) 229:17–231:22.

³⁶⁸ JD1 Dep. Vol. 1 (Ex. 1) 230:1-3.

³⁶⁹ JD1 Dep. Vol. 1 (Ex. 1) 259:21–261:14 (testifying generally about the Red Roof hotels and then specifically about the Smyrna hotel); JD1 Dep. Vol. 2 (Ex. 2) 297:12-299:24 (Buckhead).

³⁷⁰ JD1 Dep. Vol. 1 (Ex. 1) 160:13–15, 191:3–20.

³⁷¹ JD1 Dep. Vol. 1 (Ex. 1) 194:5–19.

³⁷² JD1 Dep. Vol. 1 (Ex. 1) 194:21–195:3.

348. And she saw a huge volume of buyers, up to 20 each day.³⁷³

349. Jane Doe 1 testified that she was beaten at the Smyrna Property many times, including in the parking lot in public view.³⁷⁴

350. And she said some of the staff were present and saw her being hit or yelled at.³⁷⁵

351. The staff would also have seen her interactions with the pimps, including her unwillingness to look any of them in the face.³⁷⁶

352. Over the course of her trafficking, Jane Doe 1 “was starved a lot,” and often could only eat out of the vending machines.³⁷⁷

353. She explained how the traffickers kept all the money produced, leaving her dependent on the traffickers for food.³⁷⁸

354. She became increasingly emaciated, ultimately getting down to under 90 pounds.³⁷⁹

355. That’s no surprise, as was subjected to near-constant abuse; the

³⁷³ JD1 Dep. Vol. 1 (Ex. 1) 238:4–9.

³⁷⁴ JD1 Dep. Vol. 1 (Ex. 1) 250:4–251:25.

³⁷⁵ JD1 Dep. Vol 1 (Ex. 1) 263:2–8.

³⁷⁶ JD1 Dep. Vol. 1 (Ex. 1) 263:2-13.

³⁷⁷ JD1 Dep. Vol. 1 (Ex. 1) 184:3–8.

³⁷⁸ JD1 Dep. Vol. 1 (Ex. 1) 184:1–8.

³⁷⁹ JD1 Dep. Vol. 1 (Ex. 1) 184:1-8.

traffickers “controlled [her] mind, body, and soul.”³⁸⁰

2. Jane Doe 2 (Smyrna and Buckhead, Mar. 2013 to mid 2014)

356. Jane Doe 2’s trafficking in Atlanta began when she was in the throes of a drug addiction.³⁸¹

357. She met the PIVIP trafficker named CB who offered an easy way to make money by going on dinner dates with men for money.³⁸²

358. He assured her she would not need to have sex and that he would make sure the men “don’t get handsy.”³⁸³

359. She considered this proposal but told CB that she was not interested after all,³⁸⁴ at which point CB pulled out “a pistol” and “turned around so fast that he whipped [her] in the head with his pistol” and then said, “Bitch, you’re not going anywhere.”³⁸⁵

360. For the next year or so, CB and other members of the PIVIP gang trafficked her out of various hotels, including the Red Roof Inn hotels.³⁸⁶

³⁸⁰ JD1 Dep. Vol. 2 (Ex. 2) 330:3-21.

³⁸¹ JD2 Dep. Vol. 1 (Ex. 3) 12:12-14; 187:2-7.

³⁸² JD2 Dep. Vol. 1 (Ex. 3) 55:15-16; JD2 Resp. to ROG (Ex. 73) at 14; JD2 Vol. 2 Dep. (Ex. 4) 272:14-18; 279:2-7.

³⁸³ JD2 Dep. Vol. 1 (Ex. 3) 55:20-24.

³⁸⁴ JD2 Dep. Vol. 1, (Ex. 3) 58:10-19.

³⁸⁵ JD2 Dep. Vol. 1 (Ex. 3) 58:22–59:1.

³⁸⁶ JD2 Dep. Vol. 1 (Ex. 3) 36:8–37:18.

361. Specifically, she was trafficked at the Buckhead location from March of 2013 through mid-2014 and at the Smyrna location starting in 2014 through the middle of that year.³⁸⁷

362. The traffickers induced Jane Doe 2 to have commercial sex was by, among other things, exploiting her drug addiction,³⁸⁸ and they kept all the money.³⁸⁹

363. Jane Doe 2 explained that when she was in severe withdrawal, she would feel like she was “dying” and even have seizures.³⁹⁰

364. The traffickers exploited her withdrawals and the drug addiction of other victims “to make [them] do what they wanted.”³⁹¹

365. Without sex, she could not get drugs, and without drugs, she says, “I literally would be sh*tting, throwing up on myself, on the floor, in the bathroom, with a terrible headache, making my skin crawl. It felt like I just wanted to jump out of my skin.”³⁹²

366. Once, when she took heroin without her trafficker’s permission, he

³⁸⁷ JD2 Dep. Vol. 1 (Ex. 3) 84:24–85:5, 187:2–7, 187:7–189:10 (Smyrna property in 2014 only), 195:14–23 (Buckhead property March 2013 to the end).

³⁸⁸ JD2 Dep. Vol. 1 (Ex. 3) 63:2–16.

³⁸⁹ JD2 Dep. Vol. 1 (Ex. 3) 84:19–22; *see also id.* 89:14–16.

³⁹⁰ JD2 Dep. Vol. 1 (Ex. 3) 63:10–16.

³⁹¹ JD2 Dep. Vol. 1 (Ex. 3) 68:15–24.

³⁹² JD2 Dep. Vol. 1 (Ex. 3) 68:8–24.

“beat the living sh*t out of” her, leaving her with “two black eyes, a busted lip.”³⁹³

367. Jane Doe 2’s traffickers preferred going to hotels like the Red Roof Inns, where “[t]hey knew they could get away with committing those crimes” and that “there would be other traffickers” and “other drug dealers” at these hotels³⁹⁴

368. Jane Doe 2 understood that the traffickers “either had connections there at that hotel or it was just so wide open that they knew they wouldn’t get in trouble or they would be warned of police enforcement first.”³⁹⁵

369. Her traffickers took her most often to the Buckhead property.³⁹⁶

370. She estimates she was there up to 50 times over her trafficking period, and she would see men just about every hour or more, with men waiting in the parking lot.³⁹⁷

371. “You literally don’t even get a break. It’s like literally back to back to back to back.”³⁹⁸

372. And the pimps were there too, “a couple of doors down,” looking like “thug[s]” obviously keeping an eye on the rooms where the women were having

³⁹³ JD2 Dep. Vol. 1 (Ex. 3) 64:6–21, 69:16–70:3.

³⁹⁴ JD2 Dep. Vol. 1 (Ex. 3) 122:3-6.

³⁹⁵ JD2 Dep. Vol. 1 (Ex. 3) 122:6-12.

³⁹⁶ JD2 Dep. Vol. 1 (Ex. 3) 187:25-188:5, 195:14-16, 198:7-199:8.

³⁹⁷ JD2 Dep. Vol. 1 (Ex. 3) 198:25–199:8; JD2 Dep. Vol. 2 (Ex. 4) 282:19–284:13.

³⁹⁸ JD2 Dep. Vol. 1 (Ex. 3) 198:25–201:6.

commercial sex.³⁹⁹

373. In addition, Jane Doe 2 was never the only sex worker at the Red Roof hotel and sometimes, in her room alone, there would be up to five women having sex with multiple men throughout the day.⁴⁰⁰

374. She also confirmed that, at both hotels, she frequently requested excessive amounts of towels and the trashcans would be overflowing with used condoms.⁴⁰¹

375. “It would be crazy not to notice that stuff,” Jane Doe 2 testified.⁴⁰²

376. When Kwan was trafficking her, starting near the end of 2013 or early 2014, he began to bring her to the Smyrna property as well.⁴⁰³

377. He would drop her off with Ant Shivers and another victim, and she would usually just stay for the day.⁴⁰⁴

378. She thinks she did that a handful times but no more than 30.⁴⁰⁵

379. But like the other hotels, while she was there, at least 10 men would

³⁹⁹ JD2 Dep. Vol. 1 (Ex. 3) 200:8–21.

⁴⁰⁰ JD2 Dep. Vol. 1 (Ex. 3) 203:9–204:2 (describing the typical scene at the hotels where Jane Doe 2 was trafficked).

⁴⁰¹ JD2 Resp. to ROG (Ex. 73) at 18.

⁴⁰² JD2 Dep. Vol. 1 (Ex. 3) 201:3-4.

⁴⁰³ See JD2 Dep. Vol. 2 (Ex. 4) 362:6-363:20.

⁴⁰⁴ JD2 Dep. Vol. 2 (Ex. 4) 355:14-20.

⁴⁰⁵ JD2 Dep. Vol. 1 (Ex. 3) 189:4-13; JD2 Dep. Vol. 2 (Ex. 4) 293:2-22.

come through her room for commercial sex, in and out throughout the day.⁴⁰⁶

380. At both hotels, the traffickers required her to keep head down and “look straight at the ground.”⁴⁰⁷

381. Jane Doe 2 also knew that a hotel worker at the Smyrna location, Forrest Castille, accepted money from the traffickers to serve as a lookout and assisted the traffickers by putting the victims in certain areas of the hotel “where it would be easy not to be seen as much.”⁴⁰⁸

382. In fact, she once told him directly that the women at the hotel “were actually not there willingly.”⁴⁰⁹

383. She told him she had overheard his conversations with one of the PIVIP traffickers and warned him that he was in over his head.⁴¹⁰

3. Jane Doe 3 (Smyrna and Buckhead, 2010 to 2012)

384. Jane Doe 3 met PIVIP trafficker Bagz in about 2009, and he almost immediately began manipulating her to engage in commercial sex.⁴¹¹

⁴⁰⁶ JD2 Dep. Vol. 1 (Ex. 3) 189:22–190:2.

⁴⁰⁷ JD2 Vol. 1 Dep. (Ex. 3) 202:21–203:8; JD2 Dep. Vol. 2 (Ex. 4) 291:17–21.

⁴⁰⁸ JD2 Dep. Vol. 1 (Ex. 3) 45:15–46:19, 201:21–202:4 (testifying that Forrest would call Ant to alert him about police activity and then call later to let them know they could start up again); *see also* MM Dep. (Ex. 25) 21:10-21.

⁴⁰⁹ JD2 Vol. 1 Dep. (Ex. 3) 44:6–45:12.

⁴¹⁰ *Id.*

⁴¹¹ JD3 Dep. (Ex. 5) 49:12-50:3, 130:4-131:15.

385. He started first by starting a sexual relationship with her and pretending he wanted something more romantic.⁴¹²

386. At the same time, he also asked her to serve as his “personal assistant,” and she agreed.⁴¹³

387. But then, Bagz immediately took her to an apartment and told her to have sex with the man inside and collect money in return.⁴¹⁴

388. She was in an unfamiliar environment and felt as if she could not say no.⁴¹⁵

389. So, she did as she was told, and when she returned to Bagz who was waiting in a car, Bagz took the money.⁴¹⁶

390. Jane Doe 3 knew this wasn’t right, but Bagz exploited her religious upbringing, telling her he was her “savior.”⁴¹⁷

391. “He would preach to us from the Bible,” she explained, “and spin everything to make it seem like we were doing right by God.”⁴¹⁸

392. For example, he would say:

⁴¹² JD3 Dep. (Ex. 5) 127:18-24.

⁴¹³ JD3 Dep. (Ex. 5) 127:25–128:5.

⁴¹⁴ JD3 Dep. (Ex. 5) 126:1-22, 127:1-24.

⁴¹⁵ JD3 Dep. (Ex. 5) 128:12-17, 130:23-25.

⁴¹⁶ JD3 Dep. (Ex. 5) 126:14-22.

⁴¹⁷ JD3 Dep. (Ex. 5) 151:12–153:8.

⁴¹⁸ JD3 Dep. (Ex. 5) 151:9–21.

I'm here to save you. I'm here to help you. I'm going to rescue [you] from all these things that you've had happen to you in your past life or whatever ... I'm going to support you in everything that you do because what you're doing is for me.⁴¹⁹

393. She felt brainwashed, but she “never ever once thought [she] was doing anything voluntarily.”⁴²⁰

394. At this point, she was particularly vulnerable to Bagz' tactics as she was estranged from her family and homeless.⁴²¹

395. Bagz continued to manipulate Jane Doe 3 into having commercial sex from that point until about February or March of 2012.⁴²²

396. He would have sex with her throughout this time, but he would also use violence or threats of violence to induce her to have sex with buyers seven days a week.⁴²³

397. For example, Bagz busted her lip and gave her a black eye.⁴²⁴

398. And on more than one occasion, he even threatened to kill Jane Doe

⁴¹⁹ JD3 Dep. (Ex. 5) 153:1–8.

⁴²⁰ JD3 Dep. (Ex. 5) 152:16–17.

⁴²¹ JD3 Dep. (Ex. 5) 153:13–22 (testifying that she was homeless and estranged from her family when trafficking began); *see also* Whitmore Report (Ex. 139) at 6, 56–61.

⁴²² JD3 Dep. (Ex. 5) 73:25–74:2 (testifying that trafficking ended in February or March 2012).

⁴²³ JD3 Dep. (Ex. 5) 134:6–20, 219:1–7, 286:15–287:1; *see also* Ex. 143 at 4.

⁴²⁴ JD3 Dep. (Ex. 5) 286:15–287:1; Ex. 143 at 4.

3's family.⁴²⁵

399. "We had to have sex, and we had to make money to give to him," she testified.⁴²⁶

400. In fact, Bagz imposed a "thousand-dollar-a-day quota," which meant she had to see at least 10 buyers, often more.⁴²⁷

401. And like his other victims, she never kept any of the money she collected.⁴²⁸

402. Meanwhile, Jane Doe 3 began to wither away, eventually getting down to about a hundred pounds with bags under her eyes.⁴²⁹

403. Jane Doe 3 believes Bagz trafficked her at the Smyrna hotel up to five separate stays and at the Buckhead property once.⁴³⁰

404. At the Red Roof hotels, Jane Doe 3 and the other victims would use large amounts of condoms and leave the used ones in the trash cans when they left the hotel.⁴³¹

405. They would pay in cash every day, even if they stayed for multiple

⁴²⁵ JD3 Dep. (Ex. 5) 219:1–7.

⁴²⁶ JD3 Dep. (Ex. 5) 137:4–6.

⁴²⁷ JD3 Dep. (Ex. 5) 138:2–6.

⁴²⁸ JD3 Dep. (Ex. 5) 140:21–24, 184:24–185:2 (testifying that Bagz kept the money and the victims didn't have access to it).

⁴²⁹ JD3 Dep. (Ex. 5) 300:24–301:17.

⁴³⁰ JD3 Dep. (Ex. 5) 78:13–79:10.

⁴³¹ JD3 Dep. (Ex. 5) 205:22–206:18; JD3 Resp. to ROG (Ex. 81) at 24.

days at a time.⁴³²

406. The traffickers or their victims would often rent multiple rooms with multiple girls in each room, and then multiple men would come and go through those rooms throughout the day.⁴³³

407. Jane Doe 3's trafficking at the two Red Roof hotels lasted from 2010 to early 2012.⁴³⁴

4. Jane Doe 4 (Smyrna, Apr. 2011 to Apr. 2012)

408. Another PIVIP trafficker named Diablo sold Jane Doe 4 for sex from April 2011 through April 2012, including up to seven times at the Smyrna property, staying about three nights each time.⁴³⁵

409. Diablo started grooming Jane Doe 4 for commercial sex with romance, convincing her that he wanted to be her boyfriend.⁴³⁶

410. He quickly got her having sex for money, which he kept, and he used

⁴³² JD3 Dep. (Ex. 5) 303:17–23.

⁴³³ JD3 Dep. (Ex. 5) 303:17–304:4.

⁴³⁴ JD3 Dep. (Ex. 5) 73:22–74:2 (end in Feb./Mar. 2012), 78:4–8 (Smyrna), 79:1–7 (Buckhead).

⁴³⁵ JD4 Dep. (Ex. 6) 11:14–17, 12:10–14, 20:13–17, 25:1–11, 103:10–104:11, 131:10–22.

⁴³⁶ JD4 Dep. (Ex. 6) 87:11–88:5.

violence to scare Jane Doe 4 from quitting.⁴³⁷

411. At times, she would have a black eye.⁴³⁸

412. He even threatened to shoot up her grandmother's house if she tried to leave.⁴³⁹

413. Jane Doe 4 would usually arrive at this hotel with Diablo, but he would do all the talking and book the room, while she stood by silently.⁴⁴⁰

414. And then, for the rest of her stay, she went around the hotel avoiding eye contact, keeping her eyes to the ground as she was instructed.⁴⁴¹

415. Jane Doe 4 explained how she had to look "down at the ground" and not show her teeth or "look at anyone in the eyes unless your name is called ... by your trafficker."⁴⁴²

416. The hotel always put them in the back because, as Jane Doe 4 understood it, the workers knew what Diablo was up to.⁴⁴³

417. And workers at this hotel served as lookouts for the PIVIP gang,

⁴³⁷ JD4 Dep. (Ex. 6) 248:17-21 (testifying how the trafficker "threw my ass in the hotel room, beat my ass and sold it"), 133:19-24, 217:12-13 (testifying that she never saw money).

⁴³⁸ JD4 Dep. (Ex. 6) 165:22-24.

⁴³⁹ JD4 Dep. (Ex. 6) 108:14-20.

⁴⁴⁰ JD4 Dep. (Ex. 6) 104:24-106:18.

⁴⁴¹ JD4 Dep. (Ex. 6) 166:2-8.

⁴⁴² JD4 Dep. (Ex. 6) 166:3-8.

⁴⁴³ JD4 Dep. (Ex. 6) 104:24-106:18.

notifying them when police were nearby.⁴⁴⁴

418. While there, Jane Doe 4 made frequent requests for extra linens, and there was a revolving door of buyers at her room.⁴⁴⁵

419. The trash cans also contained an extraordinary number of used condoms.⁴⁴⁶

420. And Jane Doe 4 saw other victims there as well, some with bruises and others with pimps sitting outside the door while the victims were “getting hit and raped or trafficked.”⁴⁴⁷

5. RK (Buckhead, 2010 to 2013) and TH (Buckhead, 2010 to 2011)

421. Two members of PIVIP, Bless and Bagz, trafficked RK and TH in Atlanta, including at the Buckhead property.⁴⁴⁸

422. Bless paid for RK (18 years old) and TH (17 years old) to fly from

⁴⁴⁴ JD1 Dep. Vol. 1 (Ex. 1) 259:21–261:14 (testifying generally about the Red Roof hotels and then specifically about the Smyrna hotel); JD2 Dep. Vol. 1 (Ex. 3) 45:15–46:19, 201:21–202:4 (testifying that Forrest would call Ant to alert him about police activity and then call later to let them know they could start up again); see also MM Dep. (Ex. 25) 21:10–21.

⁴⁴⁵ JD4 Resp. to ROG (Ex. 79) at 14–15.

⁴⁴⁶ JD4 Resp. to ROG (Ex. 79) at 14.

⁴⁴⁷ JD4 Dep. (Ex. 6) 106:22–107:1 (testifying about other victims with bruises and pimps.

⁴⁴⁸ RK Dep. (Ex. 22) 18:24–19:21, 237:7–14, 258:6–13; TH Dep. (Ex. 23) 20:15–21, 68:4–8; 130:4–18.

Texas to Atlanta for what Bless promised to be a better life.⁴⁴⁹

423. But when they arrived, they were taken to a “dingy hotel with really sketchy people.”⁴⁵⁰

424. And Bless then made clear he expected them to have sex for money for him.⁴⁵¹

425. There was another girl in the room with them at that time who “looked miserable.”⁴⁵²

426. Bless took the other woman into the bathroom and “beat the crap out of her.”⁴⁵³

427. “It was very, very loud and like it was at that point the most terrifying thing I’d ever heard,” RK explained.⁴⁵⁴ “And that was enough to scare us into submission.”⁴⁵⁵

428. Over the course of the next few weeks, Bless ordered RK and TH to have sex for money, all the while threatening to “beat the crap out of” them.⁴⁵⁶

429. Bless also had sex with RK. RK explained: “[I]t was understood that

⁴⁴⁹ RK Dep. (Ex. 22) 183:17–184:17; TH Dep. (Ex. 23) 222:25–223:4.

⁴⁵⁰ RK Dep. (Ex. 22) 194:7–195:4; TH Dep. (Ex. 23) 14:25–15:9, 229:1–21.

⁴⁵¹ RK Dep. (Ex. 22) 195:10–12.

⁴⁵² RK Dep. (Ex. 22) 194:23–195:4.

⁴⁵³ RK Dep. (Ex. 22) 196:4–12; TH Dep. (Ex. 23) 133:7–9.

⁴⁵⁴ RK Dep. (Ex. 22) 196:4–12.

⁴⁵⁵ RK Dep. (Ex. 22) 196:4–12.

⁴⁵⁶ RK Dep. (Ex. 22) 202:20–203:6.

when you were a pimp’s girl, you were basically their property and ... [y]ou had to have sex with them if that’s what they wanted.”⁴⁵⁷

430. Their time with Bless was short. RK met another PIVIP trafficker, Bagz, who initially seemed to be safer.⁴⁵⁸

431. On the recommendation of other victims, and in a very tense exchange with several PIVIP traffickers lined up in a hallway, RK told Bagz she wanted to work for him instead.⁴⁵⁹

432. Bless then began “pulling out his gun and subtly pointing it at” RK. “[I]t was really scary,” she explained, “but all I could think at that time was I have to get away from him. And it felt like Bagz was my escape at the time and a better situation.”⁴⁶⁰

433. Bagz became her trafficker, but she quickly learned that he was “20 times scarier than Bless ever was.”⁴⁶¹

434. He beat RK often,⁴⁶² punching her in the face “till she was black and

⁴⁵⁷ RK Dep. (Ex. 22) 220:8–12.

⁴⁵⁸ RK Dep. (Ex. 22) 227:24–238:13.

⁴⁵⁹ RK Dep. (Ex. 22) 227:24–238:13.

⁴⁶⁰ RK Dep. (Ex. 22) 227:24–228:11.

⁴⁶¹ RK Dep. (Ex. 22) 238:3–13.

⁴⁶² TH Dep. (Ex. 23) 160:11–15; *see also* TH Dep. (Ex. 23) 161:6–16 (testifying that she saw Bagz beat RK after a buyer pulled a gun on her, forced her to perform oral sex, and then left without paying).

blue and swollen.”⁴⁶³

435. She knew if she refused to engage in sex for money as ordered, he’d beat her again.⁴⁶⁴

436. He was manipulative, too. For example, he would threaten to beat her and then he “would flip it” and “start being really, really nice.”⁴⁶⁵

437. He convinced RK that her family “did not want anything to do with” her.⁴⁶⁶

438. And he generally wouldn’t allow her to call them, or if he did, “he was right there listening to the phone calls.”⁴⁶⁷

439. He wouldn’t even let her call her father “Daddy,” any more.⁴⁶⁸

440. Instead, she and the other victims had to call *him* “Daddy.”⁴⁶⁹

441. Bagz also exploited RK’s religion, often using “the Bible to try to manipulate” RK and others into submitting to his will.⁴⁷⁰

442. Meanwhile, after about a week with Bless, TH managed to get back to

⁴⁶³ RK Dep. (Ex. 22) 280:13–17.

⁴⁶⁴ RK Dep. (Ex. 22) 264:14–15.

⁴⁶⁵ RK Dep. (Ex. 22) 240:8–20.

⁴⁶⁶ RK Dep. (Ex. 22) 72:25–73:6.

⁴⁶⁷ RK Dep. (Ex. 22) 73:19–21.

⁴⁶⁸ RK Dep. (Ex. 22) 83:8–17.

⁴⁶⁹ TH Dep. (Ex. 23) 104:10–16.

⁴⁷⁰ RK Dep. (Ex. 22) 76:6–17.

Texas, but several weeks later, she connected with RK and Bagz.⁴⁷¹

443. Bagz had a music studio and appeared to her to legitimately have an opportunity in Atlanta for her to work with a real rapper.⁴⁷²

444. Bagz sent TH money to get a flight to Atlanta, picked her up at the airport, took her to a nice hotel and restaurant, and bought her a nice outfit.⁴⁷³

445. But that night, Bagz forced TH to perform oral sex on him and from that point, began to traffic her for sex as well.⁴⁷⁴

446. Bagz used violence and manipulation to control TH. For example, once at a hotel, she had fallen asleep against his orders, she woke to hear him knocking on the door. “And when I opened the door,” she testified, “he put his hands around my throat and choked me out and put me on the bed and was choking me out, so I almost blacked out.”⁴⁷⁵

447. Bagz also exploited the fact that TH came from a broken family while continuing to make false promises to induce her to stay.⁴⁷⁶

448. Bagz trafficked RK from about fall of 2010 through March 2013, including about 25 times at the Buckhead property, with stays on average of 5 days

⁴⁷¹ TH Dep. (Ex. 23) 241:14–24.

⁴⁷² TH Dep. (Ex. 23) 242:8–17.

⁴⁷³ TH Dep. (Ex. 23) 242:2–4, 243:2–9.

⁴⁷⁴ TH Dep. (Ex. 23) 243:11–13.

⁴⁷⁵ TH Dep. (Ex. 23) 120:6–16.

⁴⁷⁶ TH Dep. (Ex. 23) 134:18–24; *see also* TH Dep. (Ex. 23) 177:13–20.

each.⁴⁷⁷

449. He trafficked TH for about seven months in 2010 to the early part of 2011 (when she was still 17 years old).⁴⁷⁸

450. TH turned 18 in March of 2011.⁴⁷⁹

451. In total, Bagz took her to the Buckhead property about three to seven days at a time, at least once a month.⁴⁸⁰

452. TH explained that Bagz frequented this hotel more than others because it was “one of the hotels that was in rotation that he seemed the most comfortable at.”⁴⁸¹

453. As with his other victims, Bagz kept all the money.⁴⁸²

454. And he had a quota: “A thousand was the minimum,” TH testified.⁴⁸³ “To eat, we had to make a thousand dollars,” which translated into up to 10 buyers

⁴⁷⁷ RK Dep. (Ex. 22) 232:22-233:2 (testifying that Bagz trafficked her from Oct. 2010 to Mar. 2013); RK Dep. (Ex. 22) 257:2–9 (25 times); RK Dep. (Ex. 22) 257:10–13 (5 days at a time).

⁴⁷⁸ TH Dep. (Ex. 23) 68:4–21. TH escaped for about 2 weeks in December of 2010, but Bagz came to Texas and brought her to Atlanta. *Id.* 262:20–264:7, 268:25–269:3. TH escaped again in early 2011, but Bagz found her again and brought her back for another week of that year. *Id.* 69:11–15, 200:18–21, 261:13–262:3.

⁴⁷⁹ TH Dep. (Ex. 23) 83:17–22.

⁴⁸⁰ TH Dep. (Ex. 23) 254:7–12, 163:10–11.

⁴⁸¹ TH Dep. (Ex. 23) 130:4–18, 161:25–162:9, RK Dep. (Ex. 22) 257:16–19.

⁴⁸² RK Dep. (Ex. 22) 263:12–16; TH Dep. (Ex. 23) 282:5–7.

⁴⁸³ TH Dep. (Ex. 23) 149:6–150:17, 150:25–151:8.

per day, though they often made more than the quota.⁴⁸⁴

455. During their stays at the Buckhead property, RK and TH interacted with housekeeping often to request more linens.⁴⁸⁵

456. “We had to get a lot of ... towels throughout the day for when we were seeing customers to clean up everything,” RK explained.⁴⁸⁶

457. If it was after hours, RK or TH would go the front desk for towels.⁴⁸⁷

458. And they or other victims went to the front desk each day to pay for the rooms in cash.⁴⁸⁸

459. During these interactions, RK and TH dressed provocatively, with heels and dresses and showing lots of skin.⁴⁸⁹

460. Meanwhile, on a daily basis, the trash can in RK and TH’s room would have up to 20 used condoms in it.⁴⁹⁰

461. There would also be “lube and boxes of condoms in the room, and it

⁴⁸⁴ TH Dep. (Ex. 23) 149:6–150:17, 150:25–151:8; RK Dep. (Ex. 22) 250:16–251:4 (confirming the PIVIP victims had a daily quota and would have to make that plus enough money to eat or get room, otherwise they “would get beat up”), 303:4–9.

⁴⁸⁵ RK Dep. (Ex. 22) 267:13–18.

⁴⁸⁶ RK Dep. (Ex. 22) 267:5–12; *see also* TH Dep. (Ex. 23) 275:8–14.

⁴⁸⁷ RK Dep. (Ex. 22) 267:5–12; *see also* TH Dep. (Ex. 23) 275:8–14.

⁴⁸⁸ RK Dep. (Ex. 22) 267:5–12; TH Dep. (Ex. 23) 274:20–21.

⁴⁸⁹ TH Dep. (Ex. 23) 274:4–17.

⁴⁹⁰ TH Dep. (Ex. 23) 275:19–276:1.

was clearly a working room.”⁴⁹¹

462. Thus, the hotel workers would have seen “two young girls and ... 20-plus customers coming to their room within a 24-hour period day in, day out, and [the girls are] asking for excessive amount of towels.”⁴⁹²

463. As TH testified about trafficking at Buckhead, “It was in your face.”⁴⁹³

464. Bagz liked the Red Roof Inn Buckhead in particular, because he had a solid relationship with the employees there. RK recalls how, at some hotels, Bagz wouldn’t even get out of the car while at Buckhead, “he would not only go inside and pay for the room when we’d first get to the hotel, but he would hang out in the parking lots of these hotels with other pimps.”⁴⁹⁴

465. TH testified that “[a]ll the pimps would hang out there” and would “often blare music outside.”⁴⁹⁵

466. Bagz also smoked with the prostitutes in the parking lot.⁴⁹⁶

467. And both RK and TH explained how he would socialize with the workers at Buckhead as if he were “very familiar” with them, saying “appreciate

⁴⁹¹ TH Dep. (Ex. 23) 276:3–4.

⁴⁹² TH Dep. (Ex. 23) 276:7–11.

⁴⁹³ TH Dep. (Ex. 23) 276:15.

⁴⁹⁴ RK Dep. (Ex. 22) 269:1–14; *see also* TH Dep. (Ex. 23) 278:18–279:3.

⁴⁹⁵ TH Dep. (Ex. 23) 278:18–279:3.

⁴⁹⁶ RK Dep. (Ex. 22) 269:7–14; TH Dep. (Ex. 23) 278:22.

you,” and things like that.⁴⁹⁷

468. “He’d just flaunt it,” TH testified about Bagz’ trafficking at the Buckhead property.⁴⁹⁸

469. It would have been “very obvious” to the workers at this hotel that Bagz was the pimp and RK and the other victims were “his” property.⁴⁹⁹

470. PIVIP had a rule that the victims had to keep their head down and could not look at anyone in the eye, and RK even got in trouble once for violating that rule.⁵⁰⁰

471. Anyone could tell based on “the way we were to follow behind him and walk with our heads down and bring our money downstairs while he waited downstairs.”⁵⁰¹

472. Often, there would be one pimp with multiple submissive girls, coming down from the rooms to give him money and then returning upstairs to meet with more men.⁵⁰²

⁴⁹⁷ RK Dep. (Ex. 22) 270:11–21; *see also* TH Dep. (Ex. 23) 273:5–10; TH Dep. (Ex. 23) 278:18–19 (testifying how Bagz seemed very comfortable at the Buckhead hotel).

⁴⁹⁸ TH Dep. (Ex. 23) 286:11–13.

⁴⁹⁹ RK Dep. (Ex. 22) 269:20–271:3.

⁵⁰⁰ RK Dep. (Ex. 22) 37:20–23 (testifying that PIVIP had a rule that you had to keep your head down), 219:20–23.

⁵⁰¹ RK Dep. (Ex. 22) 269:23–271:3.

⁵⁰² RK Dep. (Ex. 22) 271:16–272:1.

6. KP (Buckhead, 2011 to 2014).

473. Another member of the PIVIP gang named Tricky (a/k/a T) trafficked KP for sex in Atlanta, and from 2011 to 2014, T frequently brought KP to the Buckhead property, along with at least 5 other victims.⁵⁰³

474. T used a variety of methods to control KP, including manipulation, love and affection, and violence or threats.⁵⁰⁴

475. He used love and affection, manipulating her to believe he was her boyfriend.⁵⁰⁵

476. He sold her on a glamorous lifestyle, convincing her to have sex for money so she could live a good life, but that was a lie.⁵⁰⁶

477. Instead, T kept all the money collected from selling KP for sex.⁵⁰⁷

478. And he also “creatively” manipulated her, convincing her he loved her but also threatening to tell her family about the commercial sex activity or to

⁵⁰³ KP Dep. (Ex. 16) 9:14–22 (2011 to 2014), 163:15–18 (trafficked at Buckhead 2012 to 2014), 203:11–13, 223:6–11 (KP met T through Diablo and the PIVIP gang), 236:5–19 (2011 through 2014), 66:2–67:1 (Tricky had more than 5 victims).

⁵⁰⁴ KP Dep. (Ex. 16) 59:5–6, 61:18–23 (testifying the traffickers “will often pit you against one another”), 104:20–105:14 (testifying that T made violent threats against her and beat her more than 10 times), 164:24–165:6 (testifying that T brainwashed her), 171:4–11 (same), 225:16–226:10 (testifying about T’s grooming), 225:22–226:10 (discussing how she was manipulated).

⁵⁰⁵ KP ESA Dep. (Ex. 38) 45:10–12, 72:17–73:4.

⁵⁰⁶ KP Dep. (Ex. 16) 225:16–226:10, 244:9–15.

⁵⁰⁷ KP Dep. (Ex. 16) 49:17–22, 244:9–15.

“out[.]” her in some way.⁵⁰⁸

479. He also physically hurt KP, beating “the brakes off of” her at least 10 times.⁵⁰⁹

480. Eventually, she just started doing what T wanted so she wouldn’t get beat up.⁵¹⁰

481. And he ordered her not to interact with other traffickers unless told to do so.⁵¹¹

482. But the trafficking took its toll, and she eventually began to look “incredibly pale and sleep deprived.”⁵¹²

483. As with other victims, KP’s trash cans would overflow with condoms, and she and other victims would request a large number of extra towels and sheets to clean up.⁵¹³

7. CA (Buckhead, 2009 to 2014)

484. CA was another victim of PIVIP. Two PIVIP traffickers, Fresh and

⁵⁰⁸ KP ESA Dep. (Ex. 38) 61:17–21.

⁵⁰⁹ KP ESA Dep. (Ex. 38) 62:5–18; *see also* KP Dep. (Ex. 16) 104:20–105:14.

⁵¹⁰ KP ESA Dep. (Ex. 38) 66:7–16.

⁵¹¹ KP Dep. (Ex. 16) 36:18–22, 61:12–23.

⁵¹² KP Dep. (Ex. 16) 185:4–12.

⁵¹³ KP Resp. to ROG (Ex. 77) at 19.

Bagz, brought her to the Buckhead property often from 2009 to 2014.⁵¹⁴

485. Her average stay was usually two to three nights, but in 2014, she recalls staying at this hotel for weeks.⁵¹⁵

486. CA described how her trafficking began. “[T]hey sold the dream ... made everything look glamorous,” she testified.⁵¹⁶

487. They promised her after six months, she’d be rich and could stop, but that was not true.⁵¹⁷

488. Her traffickers exploited her vulnerability, manipulated her emotions with false signs of love and affection, abused her emotionally, beat her, threatened her, and all the while, they kept all the money, for six years.⁵¹⁸

489. The violence started a few months in and worsened over time.⁵¹⁹

490. During the time she was trafficked, Fresh broke her nose, for example.⁵²⁰

⁵¹⁴ CA Dep. Vol. 1 (Ex. 20) 34:12–35:25.

⁵¹⁵ CA Dep. Vol. 1 (Ex. 20) 35:6–38:5.

⁵¹⁶ CA Dep. Vol. 1 (Ex. 20) 110:11–21.

⁵¹⁷ CA Dep. Vol. 1 (Ex. 20) 110:25–111:18.

⁵¹⁸ CA Dep. Vol. 1 (Ex. 20) 81:23–82:9, 110:11–111:18, 115:3–11, 88:11–15; CA Resp. to ROG (Ex. 70) at 23–24; *see also* Whitmore Report (Ex. 139) at 6, 28–30.

⁵¹⁹ CA Dep. Vol. 1 (Ex. 20) 114:16–18; *see also* KP ESA Dep. (Ex. 38) 66:7–9.

⁵²⁰ CA Dep. Vol. 2 (Ex. 21) 261:24–262:3 (trafficker broke her nose); CA Resp. to ROG (Ex. 70) at 38 (referencing the broken nose); CA ESA Dep. (Ex. 39) 177:21–23, 180:12–181:6.

491. She was beaten “constantly,” and left with a broken eardrum.⁵²¹

492. She was also forced to watch as Bagz forced RK to “wipe sh*t off from his ass.”⁵²²

493. CA had no car and could not travel freely.⁵²³

494. Although Bagz was physically violent often, he would also charm CA, convincing her they were in love.⁵²⁴

495. Bagz used these methods to “brainwash” CA into doing what he wanted, including have sex for money, which he kept.⁵²⁵

496. While at this hotel, Bagz would often demean his victims within earshot of anyone on the hotel property, calling them “ho” or “b*tch.”⁵²⁶

497. At times he would rent up to three rooms a night, while standing with multiple, scantily-clad women (his victims) wearing high heels.⁵²⁷

498. And as described above, Bagz liked the Buckhead property in

⁵²¹ CA ESA Dep. (Ex. 39) 180:12–181:6.

⁵²² CA ESA Dep. (Ex. 39) 180:20–21.

⁵²³ CA Resp. to ROG (Ex. 70) at 23.

⁵²⁴ CA Dep. Vol. 2 (Ex. 21) 324:9–14, 343:17–344:7.

⁵²⁵ CA Dep. Vol. 1 (Ex. 20) 82:4–9; *see also* RK Dep. (Ex. 22) 240:8–20 (describing how Bagz would use force and affection to control his victims); Whitmore Report (Ex. 139) at 6, 29.

⁵²⁶ CA Resp. to ROG (Ex. 70) at 28.

⁵²⁷ CA Resp. to ROG (Ex. 70) at 28.

particular because it was where he “seemed most comfortable.”⁵²⁸

499. He was “very familiar” with the workers at Buckhead, saying things like “appreciate you” to them when he was there.⁵²⁹

500. As TH testified about Bagz’s trafficking at Buckhead: “He’d just flaunt it.”⁵³⁰

501. Bagz also smoked with the prostitutes in the parking lot.⁵³¹

502. While he was at the Buckhead property, he dressed like a pimp, in expensive clothes, and surrounded himself with his young, female victims.⁵³²

503. And there would be a huge volume of men coming and going from the rooms he rented because of the trafficking going on there.⁵³³

504. As he did with his other victims, Bagz imposed a quota for CA.⁵³⁴

505. And the trashcans in the rooms where CA was trafficked would be

⁵²⁸ TH Dep. (Ex. 23) 130:4–18; *id.* 161:25–162:9; RK Dep. (Ex. 22) 257:16–19; *see also* JD2 Dep. Vol. 1 (Ex. 3) 188:1-5, 195:10-20, 198:15–199:12

⁵²⁹ RK Dep. (Ex. 22) 270:11–21; *see also* TH Dep. (Ex. 23) 273:5–10; TH Dep. (Ex. 23) 278:18–19 (testifying how Bagz seemed very comfortable at the Buckhead Red Roof).

⁵³⁰ TH Dep. (Ex. 23) 286:12–13.

⁵³¹ RK Dep. (Ex. 22) 269:7–14; TH Dep. (Ex. 23) 278:21-22.

⁵³² CA Resp. to ROG (Ex. 70) at 25.

⁵³³ CA Resp. to ROG (Ex. 70) at 28.

⁵³⁴ CA Resp. to ROG (Ex. 70) at 24.

overflowing with condoms.⁵³⁵

8. MM (Smyrna, 2010-2012)

506. MM was trafficked out of the Smyrna property from about the end of 2010 or beginning of 2012 through sometime in 2012.⁵³⁶

507. MM had a crack cocaine addiction and was living out of this hotel, depressed because she had just given up her newborn for adoption.⁵³⁷

508. MM met a drug dealer who gave her drugs and started to treat her nicely around the same time someone stole most of her money, leaving her with just enough for a night in a hotel room.⁵³⁸

509. Shortly afterwards, when she was alone in a hotel room with him, he got angry, “pulled his cigarettes out of his pocket, and he lit the filter of his cigarette and he burnt [her] on [her] chest. And he said, ‘Bitch, you’re not going anywhere. You belong to me now.’”⁵³⁹

510. She was “terrified.”⁵⁴⁰

511. “I figured my best bet [was] to just go along with what he’s doing,”

⁵³⁵ See TH Dep. (Ex. 23) 275:18-276:1; CA Resp. to ROG (Ex. 70) at 29 (testifying about the same scene at other hotels as well).

⁵³⁶ MM Dep. (Ex. 25) 55:7–57:17.

⁵³⁷ MM Dep. (Ex. 25) 205:9–206:23, 211:5–7.

⁵³⁸ MM Dep. (Ex. 25) 206:4–23, 209:5–210:2, 211:3–16, 217:1–219:2.

⁵³⁹ MM Dep. (Ex. 25) 218:17.

⁵⁴⁰ MM Dep. (Ex. 25) 232:8–19.

she explained. “To go along, out of fear, because I now knew at this point that he did carry a gun on him.”⁵⁴¹

512. He then posted ads for her on Backpage and arranged for buyers to come to various hotels to have sex with her for money.⁵⁴²

513. This man trafficked MM for sex at the Smyrna property numerous times during this period, keeping the money collected.⁵⁴³

514. And each visit was for a week or two at a time.⁵⁴⁴

515. “[The Smyrna] Red Roof was always home base to go back to,” MM testified, “because that’s where [the trafficker] ... felt he was safe.”⁵⁴⁵

516. She explained that the employees at this hotel basically had trafficker’s back. She testified:

[A]s far as pimping a girl, the Red Roof was [the trafficker’s] safest because the employees knew [him]. [The trafficker] had given them weed before. [He] had sold weed to them. [He] knew them. . . . [W]hile he was at the room at any time, if police were on the property, they were going to call the room and say: Hey look the cops are here. Chill out for a minute. Whatever. Put your stuff away. Whatever it was. Don’t come outside. Spray your room down. Whatever it was. They let him know

⁵⁴¹ MM Dep. (Ex. 25) 232:8–19.

⁵⁴² MM Dep. (Ex. 25) 219:10-15.

⁵⁴³ MM Resp. to ROG (Ex. 78) at 24.

⁵⁴⁴ MM Dep. (Ex. 25) 228:1-5.

⁵⁴⁵ MM Dep. (Ex. 25) 230:19-22.

everything.⁵⁴⁶

517. And because the trafficker felt so safe there, MM assumed the workers at the hotel must have known what was going on.⁵⁴⁷

518. Indeed, as explained above, MM had no doubt that two workers, Forrest and Barry, knew exactly what was happening.⁵⁴⁸

519. While MM was trafficked at this hotel, she saw about 10 or 15 other victims there as well, and each one was seeing multiple buyers a day, meaning that there was a huge volume of male buyers coming in and out of the hotel, including MM's room, each day.⁵⁴⁹

520. She saw other traffickers roaming the halls with their victims in tow.⁵⁵⁰

521. And the trashcans would be overflowing with used condoms, that the housekeeping staff could not miss.⁵⁵¹

522. MM also asked for an excessive number of towels while she was

⁵⁴⁶ MM Dep. (Ex. 25) 252:15–253:2.

⁵⁴⁷ MM Dep. (Ex. 25) 238:9-11.

⁵⁴⁸ *See* MM Dep. (Ex. 25) 21:10–21, 309:11–313:11 (detailing an incident at the hotel that either Forrest or Barry knew about).

⁵⁴⁹ MM Resp. to ROG (Ex. 78) at 27.

⁵⁵⁰ MM Resp. to ROG (Ex. 78) at 27; MM Dep. (Ex. 25) 269:15–20.

⁵⁵¹ MM Resp. to ROG (Ex. 78) at 27.

there.⁵⁵²

9. EH (Smyrna, 2014 to 2018)

523. A man named T trafficked EH for sex at Atlanta hotels from about 2012 to 2018, starting by courting EH for commercial sex when they first met and he paid her to pose for explicit photos.⁵⁵³

524. He immediately showed her affection, making her feel he was interested in her.⁵⁵⁴

525. They started a sexual relationship, and meanwhile, T was selling the photos of EH without EH's knowledge.⁵⁵⁵

526. Within about a week, T convinced EH to go to Birmingham with other women to make more money, but he didn't tell her what she would be doing, so she thought it was more modeling work.⁵⁵⁶

527. When she arrived in Birmingham, he put her in a hotel room alone and that's when she started to think it was "kind of a scam."⁵⁵⁷

528. But before she could really question what was going on, T came back

⁵⁵² MM Resp. to ROG (Ex. 78) at 27.

⁵⁵³ EH Dep. (Ex. 8) 234:22–240:16, 242:7–14, 245:7–247:10, 254:6–25.

⁵⁵⁴ EH Dep. (Ex. 8) 235:15–238:16, 240:13–16.

⁵⁵⁵ EH Dep. (Ex. 8) 239:16–240:16.

⁵⁵⁶ EH Dep. (Ex. 8) 238:15–242:14.

⁵⁵⁷ EH Dep. (Ex. 8) 245:17–20.

and “seduced” her.⁵⁵⁸

529. After they had sex, he said, “[I]f I ask you for something, will you do it?”⁵⁵⁹

530. He then asked her to have sex with a man for money, she hesitated, but T pressed: “You like me, right?”⁵⁶⁰

531. She was still hesitant, so he brought out a bottle of liquor and had her take shots, after which he had sex with her again.⁵⁶¹

532. She testified that after that, “as he’s holding me and kissing me on the back of my neck, he says, ‘So how about it? You going to do it?’”⁵⁶²

533. She agreed and T left so the buyer could arrive, after which EH had sex with the buyer, who left money on the bedside table.⁵⁶³

534. She then called T who told her to take a shower.⁵⁶⁴

535. By the time T returned, EH had put the money away, thinking she had earned it for herself.⁵⁶⁵

536. But T was a different person, with none of the “affection that he had

⁵⁵⁸ EH Dep. (Ex. 8) 245:21–246:10.

⁵⁵⁹ EH Dep. (Ex. 8) 246:4–5.

⁵⁶⁰ EH Dep. (Ex. 8) 246:5–247:10.

⁵⁶¹ EH Dep. (Ex. 8) 247:1–10.

⁵⁶² EH Dep. (Ex. 8) 247:1–10.

⁵⁶³ EH Dep. (Ex. 8) 249:8–252:10.

⁵⁶⁴ EH Dep. (Ex. 8) 249:8–252:10.

⁵⁶⁵ EH Dep. (Ex. 8) 249:8–252:10.

showed [her] previously.”⁵⁶⁶

537. “Where is my money,” he demanded.⁵⁶⁷

538. “I was confused,” EH testified. “I didn’t understand what he was asking me.” And when she hesitated, he beat her, demanding his “f*cking money.”⁵⁶⁸

539. “I got put on by him. He put me on,” she explained.⁵⁶⁹

540. He left her bruised and alone for two hours.⁵⁷⁰

541. When he returned, he looked “grief struck.”⁵⁷¹

542. He walked into the room, put his arms around her, apologized, and asked if they could “try again.”⁵⁷²

543. EH thought he was talking about having a relationship, so she agreed.⁵⁷³

544. For the next several days, T gave her hot baths and put ointment on her bruises, although she now realizes he was simply trying to speed up her healing

⁵⁶⁶ EH Dep. (Ex. 8) 251:25–252:3.

⁵⁶⁷ EH Dep. (Ex. 8) 252:2–3.

⁵⁶⁸ EH Dep. (Ex. 8) 252:2–16.

⁵⁶⁹ EH Dep. (Ex. 8) 252:2–16.

⁵⁷⁰ EH Dep. (Ex. 8) 252:11–16.

⁵⁷¹ EH Dep. (Ex. 8) 252:22–253:5.

⁵⁷² EH Dep. (Ex. 8) 253:7–10.

⁵⁷³ EH Dep. (Ex. 8) 253:15–17.

process to get her back to work.⁵⁷⁴

545. But by that time, he had her “wrapped around his finger.”⁵⁷⁵

546. For the next several years, T manipulated EH in this way so she would do “anything for him.”⁵⁷⁶

547. T got her hooked on cocaine to the point where she was “very addicted,” and he would use that to keep her under his grasp.⁵⁷⁷

548. T sold EH for sex and would keep all the money.⁵⁷⁸

549. T would at times have up to 5 other trafficking victims whom he exploited, keeping the money for himself.⁵⁷⁹

550. T created a name for his trafficking business, and branded this name on EH’s shoulder.⁵⁸⁰

551. Starting in about 2014 and through September 2018, T brought her often to the Smyrna property where some of her visits lasted just one day, but

⁵⁷⁴ EH Dep. (Ex. 8) 254:6-13.

⁵⁷⁵ EH Dep. (Ex. 8) 254:21–25.

⁵⁷⁶ EH Dep. (Ex. 8) 254:23-24; *see also id.* 108:21–109:25, 111:12-18 (testifying about how T would beat her).

⁵⁷⁷ EH Dep. (Ex. 8) 201:2–8, 256:7–11 (testifying that she started cocaine during trafficking); EH Resp. to ROG (Ex. 74) at 21 (testifying that her trafficker forced her to use drugs and used drug addiction to control her), 26 (testifying about being tied to a bed and force-fed cocaine).

⁵⁷⁸ EH Resp. to ROG (Ex. 74) at 21.

⁵⁷⁹ EH Dep. (Ex. 8) 37:10-13.

⁵⁸⁰ EH Dep. (Ex. 8) 55:17-56:9, 58:6-8

others lasted as many as six.⁵⁸¹

552. She estimates T brought her to this hotel 10 to 12 times over the course of her trafficking.⁵⁸²

553. And T had her have sex with 10 to 15 buyers each day, collecting money she had to give to him.⁵⁸³

554. EH was also trafficked alongside a minor who was always covered in bruises, so “[y]ou could tell she was always being beaten.”⁵⁸⁴

555. And it was clear T was EH’s pimp; he was “[a]lways very flashy, always wearing diamonds.”⁵⁸⁵

556. While at this hotel, EH interacted with several workers. She recalls one housekeeper who would “bring her stacks of towels, on average three times per day.”⁵⁸⁶

557. She would have also seen the trashcans full of condoms.⁵⁸⁷

558. EH believes the woman knew that commercial sex was happening at the hotel because the woman would say “You’re making some good money today,

⁵⁸¹ EH Dep. (Ex. 8) 258:25–259:7, 261:8–262:15.

⁵⁸² EH Dep. (Ex. 8) 262:8-15.

⁵⁸³ EH Resp. to ROG (Ex. 74) at 22; *see also* EH Dep. (Ex. 8) 107:25–108:16.

⁵⁸⁴ EH Dep. (Ex. 8) 113:17–114:12.

⁵⁸⁵ EH Dep. (Ex. 8) 69:16-23.

⁵⁸⁶ EH Dep. (Ex. 8) 125:6-11.

⁵⁸⁷ EH Resp. to ROG (Ex. 74) at 23.

huh?” and then walk away with “a smirk on her face.”⁵⁸⁸

559. She also told two security guards at the hotel that she was having sex for money.⁵⁸⁹

560. One of them kept a lookout for her to warn her if police were around, and both paid her for sex.⁵⁹⁰

561. EH was also sold for sex to a front desk worker who claimed to be the husband of the owner of the hotel.⁵⁹¹

10. MB (Smyrna, 2015 to 2016)

562. Traffickers used force and manipulation to cause MB to have sex for money which the traffickers kept, including at the Smyrna location from about November 2015 to February 2016.⁵⁹²

563. MB was particularly vulnerable to the coercion of a trafficker due to her past abuse she suffered as a child.⁵⁹³

564. MB’s trafficking started when MB was in Atlanta without a job or a

⁵⁸⁸ EH Dep. (Ex. 8) 127:16–128:3.

⁵⁸⁹ EH Dep. (Ex. 8) 131:23-25.

⁵⁹⁰ EH Dep. (Ex. 8) 130:14–131:8, 141:16–142:4; *see also* EH Resp. to ROG (Ex. 74) at 21.

⁵⁹¹ EH Dep. (Ex. 8) 148:12–149:18.

⁵⁹² MB Dep. (Ex. 9) 177:7–21, 181:10–14, 182:18–24.

⁵⁹³ MB Dep. (Ex. 9) 38:4–39:20; *see also* Whitmore Report (Ex. 139) at 6, 21-24.

place to live.⁵⁹⁴

565. She had a car and she had met a man whom she thought was her boyfriend.⁵⁹⁵

566. But her license was suspended and she was arrested and brought to jail because of the suspended license.⁵⁹⁶

567. When she got out of jail, she had nowhere to turn, but her boyfriend told her he could stay with her to “protect” her.⁵⁹⁷

568. That’s when MB learned that her boyfriend and his brother were in a gang.⁵⁹⁸

569. Shortly after that, her boyfriend was arrested, so his brother Red stepped in.⁵⁹⁹

570. She described this as “a mess,” and learned how violent the gang was.⁶⁰⁰

571. Red took her to a hotel where she met a gang of traffickers including

⁵⁹⁴ MB Dep. (Ex. 9) 64:23–65:8.

⁵⁹⁵ MB Dep. (Ex. 9) 60:25–61:16, 64:16–18.

⁵⁹⁶ MB Dep. (Ex. 9) 60:25–61:16.

⁵⁹⁷ MB Dep. (Ex. 9) 88:19–25.

⁵⁹⁸ MB Dep. (Ex. 9) 87:4–20, 91:5–25.

⁵⁹⁹ MB Dep. (Ex. 9) 87:4–15, 94:5–95:2.

⁶⁰⁰ MB Dep. (Ex. 9) 92:1–24.

Bless, Drae, and Kwan.⁶⁰¹

572. She learned that Bless “was like the main one” and she could tell that he and the other traffickers “were anticipating” her.⁶⁰²

573. They had another victim with her, and by the looks of her, MB could tell she was being trafficked.⁶⁰³

574. She immediately felt “shocked” with the setting of several gang members waiting for her.⁶⁰⁴

575. He then told her to sit down, took her car keys, and “told her exactly what [she] was going to do,” explaining that she would see “dates” to make money.⁶⁰⁵

576. And he told her that he was going to give her money “to take care of what you have to take care of as you see your dates.”⁶⁰⁶

577. She knew at this point that she was dealing with a violent gang, and she was scared.⁶⁰⁷

578. She wanted to leave, but with the gang all there, she didn’t think that

⁶⁰¹ MB Dep. (Ex. 9) 87:25–88:4, 107:21–108:19.

⁶⁰² MB Dep. (Ex. 9) 113:10–15, 146:11–13.

⁶⁰³ MB Dep. (Ex. 9) 113:16–24.

⁶⁰⁴ MB Dep. (Ex. 9) 119:1–120:21.

⁶⁰⁵ MB Dep. (Ex. 9) 87:4–20, 91:5–25, 119:7–121.

⁶⁰⁶ MB Dep. (Ex. 9) 122:8–17.

⁶⁰⁷ MB Dep. (Ex. 9) 122:8–24.

was wise to try.⁶⁰⁸

579. The traffickers then made her have sex that night and Bless kept the money.⁶⁰⁹

580. Bless, and then Drae, trafficked MB for sex over the next several months, always taking the money collected.⁶¹⁰

581. Other traffickers in this gang would also be involved, though it was clear that Bless was in charge and he would “come in and out.”⁶¹¹

582. At some point, Drae started to traffic her without Bless’s approval.⁶¹²

583. That resulted in Bless beating down the door at the Smyrna hotel, busting in, and beating Drae “all the way to the bathroom.”⁶¹³

584. MB recalls three specific stays (about four days each) where she was forced to have sex for money at the Smyrna location.⁶¹⁴

585. She believes she went to the front desk during these stays and paid for the room in cash.⁶¹⁵

586. The front desk workers always put her and her trafficker in the back

⁶⁰⁸ MB Dep. (Ex. 9) 122:19–123:2.

⁶⁰⁹ MB Dep. (Ex. 9) 123:7–22.

⁶¹⁰ MB Dep. (Ex. 9) 155:22–156:18, 181:10–14.

⁶¹¹ MB Dep. (Ex. 9) 155:22–156:18, 181:10–14, 184:2–19, 187:13–20.

⁶¹² MB Dep. (Ex. 9) 187:14–21.

⁶¹³ MB Dep. (Ex. 9) 222:16–223:14

⁶¹⁴ MB Dep. (Ex. 9) 155:1–21.

⁶¹⁵ MB Dep. (Ex. 9) 189:3–23.

of the building.⁶¹⁶

587. Whenever MB was at this hotel, there was always one of the trafficking gang members just outside the room to keep a watchful eye.⁶¹⁷

588. The traffickers even had access to her phone.⁶¹⁸

589. MB felt she was being “controlled” and was stuck doing things “against what [she] wanted.”⁶¹⁹

590. “[E]very day,” she testified, “I had to do something ... I never had a day where it was just do nothing.”⁶²⁰

591. She was forced to see on average seven buyers each day.⁶²¹

592. While she was at the Smyrna hotel, the trafficking was obvious. There were often pimps parked outside of her hotel room, near a security camera.⁶²²

593. MB explains how there would be three men obviously “not going for a regular 9:00 to 5:00 job.”⁶²³

594. She continues about the traffickers: “[T]hey’re in their car, they’re

⁶¹⁶ MB Dep. (Ex. 9) 190:11–191:10.

⁶¹⁷ MB Dep. (Ex. 9) 194:14–16, 203:14–20 (“Bless, Slim, Drae, were the consistent three men stationed” outside MB’s hotel room).

⁶¹⁸ MB Dep. (Ex. 9) 168:15–19.

⁶¹⁹ MB Dep. (Ex. 9) 218:18–23.

⁶²⁰ MB Dep. (Ex. 9) 228:17–229:2, 230:8–18.

⁶²¹ MB Dep. (Ex. 9) 230:20–232:1.

⁶²² MB Dep. (Ex. 9) 203:14–20.

⁶²³ MB Dep. (Ex. 9) 292:6–13.

upstairs, they're walking around the hotel checking out the place to make sure no police are coming in or making sure—like they were being the security for the hotel, not the hotel.”⁶²⁴

595. And it wasn't just her traffickers. There were several other pimps at the hotel while she was there.⁶²⁵

596. MB also believes housekeeping had to know what was happening because, among other things, she went through towels and rags at an incredible clip, always asking for more.⁶²⁶

597. There was often an excessive number of condoms in the room when housekeeping staff would come through.⁶²⁷

598. And MB even made sure the condoms were on the top of the trash so staff could easily spot them.⁶²⁸

599. On one occasion, she tried to tell a staff member what was happening, even though it seemed obvious.⁶²⁹

600. It was a night when one of the traffickers in the gang that trafficked MB had beaten a victim (who was with MB) so badly that the sheets and towels

⁶²⁴ MB Dep. (Ex. 9) 292:6–13.

⁶²⁵ MB Dep. (Ex. 9) 293:17–19.

⁶²⁶ MB Dep. (Ex. 9) 195:13–23.

⁶²⁷ MB Dep. (Ex. 9) 199:13–202:7.

⁶²⁸ MB Dep. (Ex. 9) 200:2–9.

⁶²⁹ MB Dep. (Ex. 9) 196:20–197:6.

were bloodied.⁶³⁰

601. MB had never seen someone get beaten so badly and it scared her.⁶³¹

602. MB timidly told the worker who was collecting the bloody linens that there was “a lot going on,” but this just fell on deaf ears.⁶³²

603. “It’s like nobody was working there and nobody cared,” she testified.⁶³³

11. DP (Smyrna, 2017)

604. A man called Trap trafficked DP from about April to September of 2017 at hotels in Atlanta including the Smyrna property.⁶³⁴

605. Trap used violence and manipulation to induce DP to have sex for money, which he kept.⁶³⁵

606. He started by pretending he wanted romance, and the two then decided that DP would have sex for money to pay for their living expenses.⁶³⁶

607. DP was particularly susceptible to this due to a prior history of sexual

⁶³⁰ MB Dep. (Ex. 9) 196:20–197:6.

⁶³¹ MB Dep. (Ex. 9) 199:17–19.

⁶³² MB Dep. (Ex. 9) 196:20–197:6, 199:21–200:9.

⁶³³ MB Dep. (Ex. 9) 234:22–25.

⁶³⁴ DP Dep. (Ex. 7) 14:3–7, 30:15–23, 64:18–67:24, 198:2–3; 255:5–13.

⁶³⁵ DP Dep. (Ex. 7) 88:15–21; *id.* at 195:10–14, 197:14–18; *see also* DP Resp. to ROG (Ex. 71) at 22–23.

⁶³⁶ DP Dep. (Ex. 7) 195:10–14.

abuse and violence and mental health issues.⁶³⁷

608. But shortly after DP started engaging in commercial sex for Trap, Trap began “to take everything” she collected.⁶³⁸

609. He was violent, too. “Roy would beat me a lot. He would pistol whip me. He would basically put me on the ground with a gun to my head. ... Many times I would have bruises everywhere”⁶³⁹

610. And he would feed her drug addiction during this time.⁶⁴⁰

611. Trap had DP stay at the Smyrna property many times in 2017, often for a day at a time, but on four or five occasions, she stayed at least a week.⁶⁴¹

612. She would see up to 10 buyers a day, and all the while, her trafficker would stay close by.⁶⁴²

613. While she was trafficked at this hotel, she observed her trafficker often interact with the workers at the hotel who would come to her door and, in particular, a housekeeper named Ms. Dee and a security guard.⁶⁴³

⁶³⁷ See DP Dep. (Ex. 7) 50:14–52:25, 146:22–149:25; see also Whitmore Report (Ex. 139) at 6, 48-53.

⁶³⁸ DP Dep. (Ex. 7) 197:14–18.

⁶³⁹ DP Dep. (Ex. 7) 88:15–21.

⁶⁴⁰ DP Dep. (Ex. 7) 80:2–6; see also *id.* 81:23–25 (“I was really gone on drugs and abused a lot by Trap”).

⁶⁴¹ DP Dep. (Ex. 7) 41:18–42:6, 64:24–65:3, 65:25–66:2, 67:1–9.

⁶⁴² DP Resp. to ROG (Ex. 71) at 23.

⁶⁴³ DP Dep. (Ex. 7) 38:14–22, 42:21–25, 275:5–13.

614. Trap would talk to the security guard about “where he could go [and] which rooms [were] good.”⁶⁴⁴

615. And she herself interacted with a security guard at the hotel once after she and Trap had a loud fight.⁶⁴⁵

616. She remembers how he cornered her near the vending machine and told her that if they weren’t more “quiet, he was going to call the police because he knew what [they] were doing.”⁶⁴⁶

617. It was no surprise that the security guard knew what Trap and DP were up to because it was obvious. “We had dudes following us around all the time. We’d have multiple people coming in and out of rooms,” DP testified.⁶⁴⁷

618. She also testified that she would walk around the hotel in “skimpy shorts” and similar provocative clothes.⁶⁴⁸

619. And there was “constant fighting” in the rooms.⁶⁴⁹

12. WK (Smyrna and Buckhead, Summer 2014 to end of 2014)

620. The first time WK was sold for sex was when she was 14 years old.⁶⁵⁰

⁶⁴⁴ DP Dep. (Ex. 7) 42:22–43:11.

⁶⁴⁵ DP Dep. (Ex. 7) 40:15–24.

⁶⁴⁶ DP Dep. (Ex. 7) 40:15–24.

⁶⁴⁷ DP Dep. (Ex. 7) 48:6–8, 296:22–297:2.

⁶⁴⁸ DP Dep. (Ex. 7) 263:3–21.

⁶⁴⁹ DP Dep. (Ex. 7) 296:22–297:2.

621. Prior to that time, she was a victim of sexual molestation and had been exposed to drugs at the age of 12.⁶⁵¹

622. She had ran away from home and the trafficker sold her drugs.⁶⁵²

623. She developed a drug addiction, and within a year, she met another trafficker (who was about 30 years old) and who, again, sold her drugs.⁶⁵³

624. She found him cute and charming.⁶⁵⁴

625. Shortly after they met, he started what WK felt at the time was a romantic relationship with her.⁶⁵⁵

626. WK had no bank account at this time and essentially no money of her own.⁶⁵⁶

627. The trafficker offered to help WK have sex for money, and WK agreed.⁶⁵⁷

628. About a month in, however, the trafficker became violent and threatening.⁶⁵⁸

⁶⁵⁰ WK Dep. (Ex. 11) 99:4–22, 109:4–6.

⁶⁵¹ WK Dep. (Ex. 11) 63:22–65:4 (sexual abuse and broken home).

⁶⁵² WK Dep. (Ex. 11) 100:7–11, 101:5–102:4.

⁶⁵³ WK Dep. (Ex. 11) 117:1–2, 146:5–7, 165:5–9.

⁶⁵⁴ WK Dep. (Ex. 11) 115:14–17; 165:5–9.

⁶⁵⁵ WK Dep. (Ex. 11) 115:14–116:6.

⁶⁵⁶ *See* WK Dep. (Ex. 11) 111:22–112:2, 146:10–14.

⁶⁵⁷ WK Dep. (Ex. 11) 115:1–5.

⁶⁵⁸ WK Dep. (Ex. 11) 121:12–18.

629. He told her that she “belong[ed]” to him and threaten to kill her if she left.⁶⁵⁹

630. And he monitored her cell phone, going through her messages and listening to her conversations.⁶⁶⁰

631. He also imposed a quota, requiring that WK make between \$1200 and \$1500 each day, which meant up to 15 buyers.⁶⁶¹

632. And he kept all the money.⁶⁶²

633. This trafficker sold WK for sex as a minor at both Red Roof Inn hotels in 2014, starting around the summer of 2014, when trafficked her often at the Smyrna property, bringing her there about five times in total.⁶⁶³

634. He trafficked WK once at the Buckhead property, for about three days.⁶⁶⁴

635. WK recalls that hotel staff at these hotels were very friendly with her trafficker and would even buy drugs from him.⁶⁶⁵

636. The trafficker also had two other minor victims in tow at these hotels

⁶⁵⁹ WK Dep. (Ex. 11) 121:12–18.

⁶⁶⁰ WK Dep. (Ex. 11) 129:6–18.

⁶⁶¹ WK Dep. (Ex. 11) 120:7–121:9.

⁶⁶² WK Resp. to ROG (Ex. 69) at 20.

⁶⁶³ WK Dep. (Ex. 11) 124:2–124:5, 131:18–132:12, 133:2–5.

⁶⁶⁴ WK Dep. (Ex. 11) 200:2–11.

⁶⁶⁵ WK Resp. to ROG (Ex. 69) at 21.

(about 13 or 14 years old).⁶⁶⁶

637. And anyone paying attention could see her and the other minors going up to the rooms WK rented.⁶⁶⁷

638. As she testified, frequently while she was trafficked at Smyrna, WK walked around the property, often with her traffickers' two other minor victims (about 13 or 14 years old), all dressed in revealing clothes like fishnet stockings and one-piece body suits.⁶⁶⁸

639. Sometimes, WK's trafficker would rent more than one room for his victims, but usually, he would put all three victims in the same room.⁶⁶⁹

640. The workers always put the trafficker on the backside of these hotels.⁶⁷⁰

641. And WK herself would have sex with about 10 to 15 men per day at both hotels.⁶⁷¹

642. Moreover, while she was at both hotels, her trafficker would keep asking for towels.⁶⁷²

⁶⁶⁶ WK Resp. to ROG (Ex. 69) at 20–21.

⁶⁶⁷ WK Dep. (Ex. 11) 134:18–19.

⁶⁶⁸ WK Decl. (Ex. 68) at 1, ¶¶ 3–6.

⁶⁶⁹ WK Dep. (Ex. 11) 138:7–10.

⁶⁷⁰ WK Dep. (Ex. 11) 139:9–10.

⁶⁷¹ WK Dep. (Ex. 11) 120:10–121:9.

⁶⁷² WK Dep. (Ex. 11) 195:24–196:13.

643. And just as with other victims, the trash cans would be filled with used condoms at both hotels.⁶⁷³

644. Her final night of trafficking was particularly traumatizing. It was a night in December 2014, and she was at the Smyrna property, where she had been trafficked the few days prior.⁶⁷⁴

645. She and the trafficker were arguing about something and found themselves just outside their hotel room, when the trafficker started choking WK.⁶⁷⁵

646. WK recalls seeing a hotel employee pushing a housekeeping cart, making eye contact with the employee, but he made no effort to help.⁶⁷⁶

647. The trafficker then brought WK back into the hotel room where he nearly drowned her violently in the bathtub. WK explains:

He grabbed me by my hair, and he dragged me into the bathroom. He put me in the tub, and he turned the water on, and he forced my head under the water. And he kept pushing my head under the water and said, “I’m going to kill you, stupid bitch.” And I kept saying like, “Stop, stop, like please stop.” And he just kept pushing my head farther and farther into the water and eventually he let go.”⁶⁷⁷

⁶⁷³ WK Resp. to ROG (Ex. 69). at 21.

⁶⁷⁴ WK Dep. (Ex. 11) 151:15–21.

⁶⁷⁵ WK Dep. (Ex. 11) 152:13-17

⁶⁷⁶ WK Dep. (Ex. 11) 149:8-150:24

⁶⁷⁷ WK Dep. (Ex. 11) 152:18–153:6.

648. After the trafficker let her loose for a moment, WK ran out of the room and down the street.⁶⁷⁸

649. A man drove by and spotted this sixteen-year-old girl, cold and wet, along the road.⁶⁷⁹

650. With his help, she made her way to a gas station where she called the police.⁶⁸⁰

13. RP (Smyrna and Buckhead, 2012 to 2016)

651. Three traffickers sold RP for sex off and on from 2012 through 2016, and each trafficker used similar tactics, exploiting RP's vulnerable mental condition to induce her to participate, and each trafficker kept all the money.⁶⁸¹

652. RP has long suffered with Bipolar 1 disorder.⁶⁸²

653. Her first trafficker, AK, exploited this by swooping into her life when she was just barely 18, offering to “save” her from what she thought was a rough home life.⁶⁸³

⁶⁷⁸ WK Dep. (Ex. 11) 153:9–11.

⁶⁷⁹ WK Dep. (Ex. 11) 153:2–17.

⁶⁸⁰ WK Dep. (Ex. 11) 153:9-24.

⁶⁸¹ *See, e.g.*, RP Dep. (Ex. 10) 76:12–19; RP Resp. to ROG (Ex. 80) at 23–24.

⁶⁸² RP Dep. (Ex. 10) 42:2–43:16.

⁶⁸³ RP Dep. (Ex. 10) 81:14–82:3.

654. RP thought at first she even loved AK,⁶⁸⁴ but shortly after they met, AK gathered his fellow gang members who collectively raped RP.⁶⁸⁵

655. From that point forward, AK used violence or threats of violence, including additional gang rapes, to sell RP for sex from about March 2012 through sometime in 2015.⁶⁸⁶

656. During this time, AK trafficked RP about three or four times at the Smyrna property but over 30 times at the Buckhead location.⁶⁸⁷

657. Her stays at the Smyrna property were mostly two to three days at a time, but she testified that she once was trafficked at that hotel for a month straight, along with younger girls (about 14 years old) who were being trafficked at the same time out of the same room.⁶⁸⁸

658. Her stays at the Buckhead property were similar in length, about two to three days to a week each visit.⁶⁸⁹

659. RP recalls one incident in about 2013 at the Buckhead property. She had been trafficked there for several days when she tried to sneak \$20 so she could

⁶⁸⁴ RP Dep. (Ex. 10) 81:14–25.

⁶⁸⁵ RP Dep. (Ex. 10) 51:22–52:23, 111:11–113:19, 148:22–150:12.

⁶⁸⁶ *See, e.g.*, RP Dep. (Ex. 10) 48:15–49: 1 (2012 to 2016), 111:3–113:19, 148:22–149:25.

⁶⁸⁷ RP Dep. (Ex. 10) 72:25–73:2, 82:4–83:12, 112:12–17, 125:21–126:24, 128:7–13.

⁶⁸⁸ RP Dep. (Ex. 10) 129:4–14.

⁶⁸⁹ RP Dep. (Ex. 10) 129:18–24.

eat.⁶⁹⁰

660. When AK found out, he beat her and brought in his fellow gang members to rape her.⁶⁹¹

661. RP's next trafficker, CG, picked up where AK left off, using force and fear to sell RP at both hotels through sometime in late 2015 or early 2016.⁶⁹²

662. She recalls CG bringing her to the Buckhead property 10 to 15 times and the Smyrna property twice.⁶⁹³

663. These visits lasted about two to three days, though RP recalls staying up to a week at the Buckhead location.⁶⁹⁴

664. Finally, RP's third trafficker took her to the Buckhead property once, likely in 2016.⁶⁹⁵

665. And like his predecessors, this trafficker exploited RP's mental health issues and used violence or threats of violence to sell RP for sex.⁶⁹⁶

666. RP described in particular how "hot" the Buckhead RRI was when she

⁶⁹⁰ RP Dep. (Ex. 10) 111:11–113:19; 294:7–295:4.

⁶⁹¹ RP Dep. (Ex. 10) 111:11–113:19.

⁶⁹² RP Dep. (Ex. 10) 47:25–50:17, 84:5–9 (2012 to 2016), 148:22–149:24.

⁶⁹³ RP Dep. (Ex. 10) 128:7–19.

⁶⁹⁴ RP Dep. (Ex. 10) 129:18–130:3.

⁶⁹⁵ RP Dep. (Ex. 10) 82:7–18, 302:15–20.

⁶⁹⁶ RP Dep. (Ex. 10) 75:7–13.

would stay there.⁶⁹⁷

667. She testified, “[E]verybody on the streets called it the hot -- the hot Red Roof because everyone just stands outside the rooms and they don’t really do that much [at other places].”⁶⁹⁸

668. She continued, “everything goes on there. Like everybody works there. There’s girls in every single room it seems like. There’s pimps everywhere.”⁶⁹⁹

669. And it was clear to RP why: “[N]o one ever gets in trouble at the Red Roof.”⁷⁰⁰

670. She confirmed that the Smyrna property was really no different, and testified that she would even pick up “tricks in the parking lot” of that hotel.⁷⁰¹

671. Over the course of her trafficking, RP saw on average 10 men a day.⁷⁰²

672. RP also testified about interactions with hotel staff. She frequently requested towels because she went through so many to serve the buyers.⁷⁰³

⁶⁹⁷ RP Dep. (Ex. 10) 218:1–6.

⁶⁹⁸ RP Dep. (Ex. 10) 247:23–248:2.

⁶⁹⁹ RP Dep. (Ex. 10) 218:3–6.

⁷⁰⁰ RP Dep. (Ex. 10) 218:7–20.

⁷⁰¹ RP Dep. (Ex. 10) 218:16–23, 235:13–16.

⁷⁰² RP Dep. (Ex. 10) 147:20–148:2.

⁷⁰³ RP Dep. (Ex. 10) 313:3–18.

673. And she even had sex with three or front desk workers at the Buckhead hotel, who paid her traffickers in exchange.⁷⁰⁴

674. At least one worker would serve as lookouts for the traffickers, calling them to notify them when police were in the area.⁷⁰⁵

14. AF (Smyrna, Nov. 2010 to end of 2011)

675. AF was trafficked by a man whom she initially considered her boyfriend.⁷⁰⁶

676. He used a combination of manipulation, false pretenses, and violence or threats of violence to induce her to have sex for money, and he kept all the money she collected.⁷⁰⁷

677. For example, the trafficker initially was very nice to AF, showering her with affection.⁷⁰⁸

678. While their relationship was seemingly romantic, he told AF that he would help her do some risqué modeling and assured her she would not have to engage in sex with anyone for money.⁷⁰⁹

⁷⁰⁴ RP Dep. (Ex. 10) 215:2–7, 297:24–298:23.

⁷⁰⁵ RP Dep. (Ex. 10) 304:23–306:20.

⁷⁰⁶ AF Dep. (Ex. 24) 167:15–168:21, 174:4–13.

⁷⁰⁷ AF Dep. (Ex. 24) 167:15–168:21, 169:3–13; 215:8–9.

⁷⁰⁸ AF Dep. (Ex. 24) 187:3–9.

⁷⁰⁹ AF Dep. (Ex. 24) 168:9–21, 169:3–13.

679. But soon after that, he began to pressure her, first falsely telling her that if she did what he asked, she would make enough money to put herself through college.⁷¹⁰

680. She finally agreed, but after her first encounter, the trafficker kept the money and would not let her enroll in school.⁷¹¹

681. AF wanted to stop, but her trafficker began threatening her.⁷¹²

682. He told her if she “tried to leave him or get in trouble that he would try to hurt [her] or [her] family.”⁷¹³

683. She knew he carried guns, and her trafficker knew where her family lived, so she found these threats convincing.⁷¹⁴

684. Moreover, she had seen her trafficker physically assault two other women, and he beat her as well.⁷¹⁵

685. “I’m sure if I told – gave the police any inkling of what was going on, that after they left, that I probably would have gotten severely beat.”⁷¹⁶

686. He also branded her with a tattoo of an eye and told her it was a

⁷¹⁰ AF Dep. (Ex. 24) 182:22–25.

⁷¹¹ AF Dep. (Ex. 24) 182:22–183:7.

⁷¹² AF Dep. (Ex. 24) 190:22–191:15.

⁷¹³ AF Dep. (Ex. 24) 190:22–191:3

⁷¹⁴ AF Dep. (Ex. 24) 188:24–189:6.

⁷¹⁵ AF Dep. (Ex. 24) 231:17–232:8.

⁷¹⁶ AF Dep. (Ex. 24) 221:13–16.

reminder that “he could always see what [she] was doing, see what [she] was saying.”⁷¹⁷

687. Through these and similar acts, the trafficker induced AF to have commercial sex and the trafficker kept all the money.⁷¹⁸

688. AF’s trafficker often took her to the Smyrna property, staying for a couple of days to a week at a time.⁷¹⁹

689. While there, AF interacted with employees at the front desk and in housekeeping, often asking for extra linens.⁷²⁰

690. And she was forced to see dozens of buyers while at the hotel, on average five each day.⁷²¹

691. The trafficker had a quota, but the quota was much higher at the Smyrna property because that hotel was always “really busy with action and prostitution.”⁷²²

692. In addition to the traffic of buyers going in and out of her room, the hotel employees would have seen AF walking around the hotel looking for

⁷¹⁷ AF Dep. (Ex. 24) 191:6–12.

⁷¹⁸ AF Dep. (Ex. 24) 215:8–9.

⁷¹⁹ AF Dep. (Ex. 24) 199:15–24, 237:18–21.

⁷²⁰ AF Dep. (Ex. 24) 39:6–40:6, 246:2–247:3.

⁷²¹ AF Dep. (Ex. 24) 199:22–200:4.

⁷²² AF Dep. (Ex. 24) 214:11–22.

dates.⁷²³

693. “I’d ... wear high heels, really short shorts, crop tops,” she explained.⁷²⁴

694. She tried to do the same thing at other hotels, but as she testified, those hotels “would call the police for loitering or ask you to leave or tell you to go, to go hang out in your room.”⁷²⁵

695. At the Smyrna property, in contrast, it “[s]eemed like ... almost everyone that stayed there was always loitering or walking around trying to find a date or was a guy with a bunch of girls.”⁷²⁶

696. She testified that “it just seemed like it was fine.”⁷²⁷

697. AF assumed that the hotel “took our money because nobody else would want to stay there. Like it wasn’t a place to bring your family.”⁷²⁸

698. The trafficking of AF at the Smyrna property went on like this from about November 2010 to the end of 2011.⁷²⁹

⁷²³ AF Dep. (Ex. 24) 242:8–14, 248:19–24.

⁷²⁴ AF Dep. (Ex. 24) 247:17–21.

⁷²⁵ AF Dep. (Ex. 24) 247:17–25.

⁷²⁶ AF Dep. (Ex. 24) 249:7–21.

⁷²⁷ AF Dep. (Ex. 24) 247:25–248:1.

⁷²⁸ AF Dep. (Ex. 24) 249:22–24.

⁷²⁹ AF Dep. (Ex. 24) 236:25–237:5, 180:21–181:2, 226:14–17.

C. Summary of Plaintiffs' Trafficking by Location and Time

699. The chart on the following page summarizes the Plaintiffs trafficking by location and time.

PL Sum. J.
Ex. 49

Plaintiffs’ Trafficking – Location and Years
Green = Smyrna; Blue = Buckhead
Bold indicates victim was trafficked at both locations.

Plaintiff	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	
JD1 (Both, late 2012–Jan. 2017)¹				Green							
JD2 (Both Mar. 2013–mid 2014)²				Blue							
JD3 (Both, 2010–early 2012)³		Green			Blue						
JD4 (Smyrna, Apr. 2011–Apr. 2012)⁴			Green								
RK (Buckhead, 2010–2013)⁵		Blue									
TH (Buckhead, 2010–2011)⁶		Blue									
KP (Buckhead, 2011–2014)⁷			Blue								
CA (Buckhead, 2009–2014)⁸	Blue										
MM (Smyrna, 2010–2012)⁹		Green									
EH (Smyrna, 2014–2018)¹⁰					Green						
MB (Smyrna, 2015–2016)¹¹						Green					
DP (Smyrna, 2017)¹²									Green		
WK (Both, Summer to Dec. 2014)¹³						Green					
RP (Both, 2012–2016)¹⁴				Green							
AF (Smyrna, Nov. 2010–end 2011)¹⁵		Green									

¹ JD1 Dep. Vol. 1 (Ex. 1) 9:4–10, 9:24–10:4, 14:6–9, 40:22–41:13.

² JD2 Dep. Vol. 1 (Ex. 3) 84:24–85:5, 187:2–7, 187:7–189:10, 195:14–23.

³ JD3 Dep. (Ex. 5) 73:22–74:2, 78:4–8 (Smyrna), 79:1–7 (Buckhead).

⁴ JD4 Dep. (Ex. 6) 11:14–17, 12:10–14, 20:13–17, 25:1–11, 103–104, 130–131.

⁵ RK Dep. (Ex. 22) 237:7–14, 258:6–13.

⁶ TH Dep. (Ex. 23) 20:15–21, 68:4–8; 130:4–18.

⁷ KP Dep. (Ex. 16) 9:14–22, 204:6–15.

⁸ CA Dep. Vol. 1 (Ex. 20) 35:6–38:10.

⁹ MM Dep. (Ex. 25) 55:7–57:17.

¹⁰ EH Dep. (Ex. 8) 258:25–259:7, 261:8–262:15.

¹¹ MB Dep. (Ex. 9) 136:19–22, 153:17–23.

¹² DP Dep. (Ex. 7) 14:3–7, 64:8–67:24.

¹³ WK Dep. (Ex. 11) 124:2–5, 131:18–132:12, 133:2–5.

¹⁴ RP Dep. (Ex. 10) 47:25–50:17 (Smyrna 2012 to April 12, 2016), 84:5–9 (2012 to 2016), 82:7–10, 302:15–20.

¹⁵ AF Dep. (Ex. 24) 236:25–237:5, 180:21–181:2, 226:14–17.

Respectfully submitted this 3rd day of March, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March 2023 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notification to all attorneys of record in the above-captioned case.

/s/ Michael R. Baumrind
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