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Attorneys for Plaintiff JOHN DOE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JOHN DOE, an individual,

Plaintiff,

v.

G6 Hospitality, LLC; G6 Hospitality Property, LLC; G6 Hospitality Franchising, LLC; Motel 6 Operating, LP; Dar-Ron Motel; Mukesh R. Patel (a/k/a Mukeshbhai R. Patel); Jema Bitar Properties LLC; William F. Bitar & Associates; Del Rancho Motel; K & D Hotel Management LLC; OM JSNRN Hospitality Group LLC; Red Roof Inn, Inc.; Red Roof Franchising, LLC; and DOES 1 through 200, inclusive,

Defendants.

Case No.:

Unlimited Jurisdiction

COMPLAINT FOR DAMAGES AND INJURIES

JURY TRIAL DEMANDED

Damages in excess of $100,000

COMPLAINT

COMES NOW the Plaintiff JOHN DOE, by and through the undersigned counsel, and respectfully submits this Complaint for damages and makes the following averments.

INTRODUCTION

1. For years, sex trafficking ventures have brazenly operated both online, and in and out of hotels throughout the United States.

2. For years, major hotel brands have made public claims that they are combatting human trafficking, while at the same time expanding their economy hotels where sex trafficking is most prevalent and profiting from crimes that are perpetrated on their properties. Despite corporate public statements, human trafficking continues to be most prevalent and lucrative in the hotel and hospitality industry.

3. Criminals parade their misconduct openly on hotel and motel properties throughout the United States, and profit from providing harbor for the underlying assaults. The hotel and hospitality industry continue to create and expand the environment for traffickers to harbor victims and neglect taking reasonable steps to prevent such criminal misconduct, instead choosing to earn a profit at the expense of human life, human rights, and human dignity.

4. Public appearances and sponsorships do not excuse corporations and individuals that have financially benefited from sex trafficking. In fact, it reveals corporate knowledge of the use of their properties and technology as hubs for human trafficking. The

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hotel industry has provided the means, environment, and support for the human trafficking industry to become the second largest profitable criminal activity in the United States.[1]

5. As the trafficking industry grows, so have Defendants and their profits through the expansion of their properties and rooms rented for this explicit and apparent purpose.

6. John Doe files this civil lawsuit seeking compensation for the harm he suffered as a result of being sex trafficked and sold for sex at hotels and motels owned, operated, maintained, managed, franchised, regulated, and controlled by Defendants and their agents and employees.

PARTIES

7. John Doe is a natural person who is currently a resident and citizen of Oregon. John Doe is a survivor of sex trafficking. From approximately 2016 to 2019, he was harbored and forced to engage in commercial sex acts for the benefit of his trafficker and Defendants.

a. Due to the sensitive, private, and potentially retaliatory nature of these allegations, this Complaint identifies John Doe by a pseudonym only. John Doe will move the court to proceed under a pseudonym in all filings, all public court proceedings, and to limit the disclosure of information about John Doe's true identity in order to protect John Doe and John Doe's identity.

[1] *See* Mary Fischer Prevention Education, *Human Trafficking Is Now the Second Most Profitable Criminal Activity in the United States*, https://www.mbfpreventioneducation.org/human-trafficking-is-now-the-second-most-profitable-criminal-activity-in-the-united-states/.

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b. Generally, pleadings must state the name of all parties. Fed. R. Civ. P. 10(a). However, there are exceptions when the issues involved may result in retaliation or harm to the Plaintiff. For good cause, the Court may issue an order to protect a party or person from undue harms and burdens.

c. In order to maintain his privacy and safety, John Doe should not be compelled to disclose his identity. John Doe's privacy interest substantially outweighs the customary practice of judicial openness. John Doe would be in danger of harm should his trafficker or his trafficker's associates learn information about him through publicly filed documents in this action. Moreover, Defendants will not be prejudiced. John Doe will agree to reveal his identity to Defendants for the limited purpose of investigating John Doe's claims once the parties have entered into a protective order.

8. Defendant G6 Hospitality, LLC is a for-profit Delaware corporation with its principal place of business in Carrollton, Texas.

9. Defendant G6 Hospitality Property, LLC is a for-profit Delaware corporation with its principal place of business at 4001 International Parkway, Carrollton, Texas 75007.

10. Defendant G6 Hospitality Franchising, LLC is a for-profit Delaware corporation with its principal place of business in Carrollton, Texas.

11. Defendant Motel 6 Operating, L.P. is a for-profit Delaware limited partnership with its principal place of business in Carrollton, Texas.

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12. Defendants G6 Hospitality, LLC, G6 Hospitality Property, LLC, G6 Hospitality Franchising, LLC, and Motel 6 Operating, L.P. will collectively be referred to as "G6 Defendants."

13. G6 Hospitality LLC directly owned, operated, and controlled the Motel 6 hotel located at 1610 NW Frontage Road, Troutdale, Oregon 97060 from approximately 2012 to 2022, Upon information and belief, G6 Hospitality Property, LCC, worked alongside G6 Defendants to operate, manage, and control the Troutdale Motel 6 from 2012 to 2022.

14. Upon information and belief, G6 Defendants and their brand Motel 6® properties include the locations at 3104-06 SE Powell Boulevard, Portland, Oregon ("Portland Motel 6") and 1610 NW Frontage Road, Troutdale, Oregon ("Troutdale Motel 6". From at least 2016 and through 2019, G6 Defendants transacted business in Multnomah County, Oregon, and purposefully availed themselves to Multnomah County, Oregon, and the citizens of Multnomah County, Oregon.

15. Defendant Jema Bitar Properties, LLC is a for-profit Oregon limited liability company formed in Oregon, with a principal address of 9829 E Burnside Street, Suite 200, Portland, Oregon 97216. Jema Bitar Properties, LLC owned and/or operated the Motel 6 hotel located at 3104-06 SE Powell Boulevard, Portland, Oregon 97202 as a franchisee of G6 Defendants during the time Plaintiff was trafficked.

16. Defendant William F. Bitar & Associates is a for-profit Oregon entity formed in Oregon, with a principal address of 9829 E Burnside Street, Suite 200, Portland, Oregon 97216. William F. Bitar & Associates owned and/or operated the Motel 6 hotel

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located at 3104-06 SE Powell Boulevard, Portland, Oregon 97202 as a franchisee of G6 Defendants during the time Plaintiff was trafficked.

17. Defendants Jema Bitar Properties, LLC and William F. Bitar & Associates will collectively be referred to as the "Bitar Defendants."

18. Defendant Red Roof Inns, Inc. ("RRI") is a for-profit Delaware corporation with its principal place of business in New Albany, Ohio.

19. Defendant Red Roof Franchising, LLC is the company RRI provides franchise opportunities for its hotel and motel brands. Red Roof Franchising is a Delaware Corporation with its principal place of business in Upper Arlington, RRI and Red Roof Franchising will be collectively referred to as "Red Roof".

20. Red Roof owned and/or operated the Red Roof Inn hotel located at 3828 NE 82nd Avenue, Portland, Oregon 97220 (now operating as the Evergreen Inn & Suites Portland Airport) during the time Plaintiff was trafficked.

21. From at least 2016 and through 2019, Red Roof transacted business in Multnomah County, Oregon, and purposefully availed themselves to Multnomah County, Oregon, and the citizens of Multnomah County, Oregon.

22. Defendant OM JSNRN Hospitality Group LLC is a for-profit Oregon limited liability company formed in Oregon, with a principal address of 3828 NE 82nd Avenue, Portland, Oregon 97220. OM JSNRN Hospitality Group LLC owned and operated the Red Roof Inn hotel located at 3828 NE 82nd Avenue, Portland, Oregon 97220 as a franchisee of Red Roof during the time Plaintiff was trafficked.

23. Defendant Dar-Ron Motel owned, operated, managed, and controlled the Dar-Ron Motel located at 7707 SE 82nd Avenue, Portland, Oregon 97266 from

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approximately 2003 to 2019, during the time Plaintiff was trafficked. The Dar-Ron Motel is independently owned and operated and is not affiliated with any national brand.

24. Defendant Mukesh R. Patel, also known as Mukeshbhai R. Patel, is a natural person residing in Oregon. Mukesh R. Patel owned, operated, managed, and controlled the Dar-Ron Motel located at 7707 SE 82nd Avenue, Portland, Oregon 97266 from approximately 2007 to 2019, during the time Plaintiff was trafficked.

25. Dar-Ron Motel and Mukesh R. Patel will be referred to as the "Dar-Ron Defendants."

26. Defendant K & D Hotel Management LLC is a for-profit Oregon limited liability company formed in Oregon, with a principal address of 7622 SE 82nd Avenue, Portland, Oregon 97266. K & D Hotel Management LLC owned, operated, managed, and controlled the Del Rancho Motel located at 7622 SE 82nd Avenue, Portland, Oregon 97266 from approximately 2014 to 2019, during the time Plaintiff was trafficked. The Del Rancho Motel is independently owned and operated and is not affiliated with any national brand.

27. Defendants Dar-Ron Motel, Mukesh R. Patel and K & D Hotel Management LLC will collectively be referred to as the "Independent Owner Defendants."

28. The Bitar Defendants and OM JSNRN Hospitality Group LLC will collectively be referred to as "Franchisee Defendants."

29. Defendants G6 Hospitality, LLC, G6 Hospitality Property, LLC, G6 Hospitality Franchising, LLC, Motel 6 Operating, L.P., Red Roof Inns, Inc., and Red Roof Franchising, LLC will collectively be referred to as "Parent Hotel Defendants."

30. The five hotel and motel properties at which Plaintiff was trafficked from 2016 to 2019 are referred to collectively as the "subject properties," and are:

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a. Dar-Ron Motel, 7707 SE 82nd Avenue, Portland, Oregon 97266;

b. Del Rancho Motel, 7622 SE 82nd Avenue, Portland, Oregon 97266;

c. Red Roof Inn, 3828 NE 82nd Avenue, Portland, Oregon 97220, now operating as the Evergreen Inn & Suites Portland Airport;

d. Portland Motel 6, 3104-06 SE Powell Boulevard, Portland, Oregon 97202; and

e. Motel 6 Troutdale Portland East, 1610 NW Frontage Road, Troutdale, Oregon 97060.

31. The true names and capacities of Defendants DOES 1 through 200 are presently unknown to Plaintiff, who will seek leave to amend this Complaint to allege their true names and capacities when ascertained. Each fictitiously named Defendant is responsible in some manner for the occurrences alleged herein.

JURISDICTION AND VENUE

32. This Court has original jurisdiction pursuant to 28 U.S.C. § 1331 because this action involves a federal question under the Trafficking Victims Protection Reauthorization Act ("TVPRA").

33. Venue is proper in this Court because a substantial part of the events or omissions giving rise to the claims asserted in this action, including the Defendants' misconduct and omissions, led to injuries that occurred in the judicial district where this action is brought.

34. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1) and (b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this district, at least one Defendant is a resident of this district, and all Defendants are

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residents of the State of Oregon within the meaning of 28 U.S.C. §§ 1391(c)(2) and 1391(d), or are otherwise subject to personal jurisdiction in this district.

SEX TRAFFICKING UNDER FEDERAL LAW

35. Sex trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of causing the person to engage in a commercial sex act either (1) before the person turns 18 years old; or (2) through force, fraud, or coercion.[2]

36. The requirements for liability under the TVPRA on a beneficiary theory can be stated as follows: (1) the person or entity "knowingly benefits, financially or by receiving anything of value" (2) "from participating in a venture" (3) that the "person knew or should have known has engaged in an act in violation of this chapter." 18 U.S.C. § 1595(a).

37. "Sex trafficking" is defined by the TVPRA under 22 U.S.C. § 7102 as "the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act."

38. The term "severe forms of trafficking in persons" includes "sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age." 22 U.S.C. § 7102.

FACTUAL ALLEGATIONS

Sex Trafficking of Plaintiff

[2] 18 U.S.C. § 1591; 22 U.S.C. § 7102.

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39. Plaintiff grew up in a small, rural town in Kansas, in a close-knit family rooted in education and hard work. In 2011, Plaintiff moved to Portland, Oregon, where the dense urban environment was a profound culture shock; he had no local family, few friends, and no support network, which left him particularly vulnerable to isolation and exploitation.

40. In 2015, Plaintiff fell into depression, lost his employment, and lost his housing.

41. At the end of 2015 or the beginning of 2016, Plaintiff met the man who would become his trafficker at a bar in Portland. Plaintiff's trafficker initially presented himself as friendly, generous, and non-threatening — striking up conversation, offering rides and drugs, and quickly calling Plaintiff his "best friend." This was the beginning of a calculated grooming process.

42. After some grooming, Plaintiff's trafficker began to force him to engage in commercial sex at while his trafficker kept all the money. The trafficker's conduct turned controlling and violent. Plaintiff's trafficker carried a gun, which Plaintiff witnessed him fire on multiple occasions, at street signs, vacant cars, and even homes. The trafficker got into fights, screamed at people in and around the motels, and treated the people he trafficked as disposable property, creating an environment in which Plaintiff reasonably believed that refusing would result in serious harm or death.

43. Plaintiff's trafficker kept all of the money paid by buyers and controlled Plaintiff's access to shelter, food, drugs, and transportation; he withheld food; he forced and controlled Plaintiff's drug use and resulting addiction; and he used psychological

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coercion, shame, and the threat of "outing" Plaintiff's sexual orientation — which he in fact carried out — to keep Plaintiff trapped and compliant.

44. Beginning in approximately 2016 until 2019, Plaintiff was subjected to sex trafficking at the Dar-Ron Motel, 7707 SE 82nd Avenue, Portland, Oregon; the Del Rancho Motel, 7622 SE 82nd Avenue, Portland, Oregon; the Red Roof Inn, 3828 NE 82nd Avenue, Portland, Oregon; the Portland Motel 6, 3104-06 SE Powell Boulevard, Portland, Oregon; and the Motel 6 Troutdale Portland East, 1610 NW Frontage Road, Troutdale, Oregon.

45. For approximately three years, Plaintiff's trafficker rotated between these hotels. These hotels were used by Plaintiff's trafficker for days and weeks at a time, encountering the same staff.

46. During this time Plaintiff was under the control of his trafficker and endured beatings, threats, and manipulation. Plaintiff's trafficker carried a firearm, fired it to intimidate, and made clear through his words, tone, and actions that refusing him would be dangerous.

47. With each stay at the subject properties, there were several consistent red flags, including but not limited to: paying for stays in cash; booking rooms under others' names or under changing names despite the same individuals repeatedly returning; arrangements "already set up" with specific employees on arrival; rooms sometimes provided without charge after staff "blacked out" rooms as "closed for maintenance" and quietly assigned those rear, least-visible rooms to Plaintiff's trafficker; Plaintiff's trafficker trading drugs to employees in exchange for room access; requesting certain rooms away from other guests; obvious signs of illegal drug use; unusually large numbers of used condoms, condom wrappers, and empty lubricant bottles in the trash; unusually large

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numbers of male visitors going in and out of Plaintiff's room at all times during the day and night; visible signs of physical abuse; and loud noises of abuse and other violence audible to staff and other rooms.

48. The pattern of visitor traffic and room use was strongly indicative of trafficking. On many occasions, three to four unregistered men per day, with no luggage and no ordinary traveler behavior, would come to Plaintiff's room in quick succession, at odd hours, for brief periods. Housekeeping staff repeatedly encountered clear physical evidence of trafficking in the rooms, including empty lubricant bottles, used condoms, condom wrappers, and discarded clothing left behind by buyers.

49. When forced and coerced into coming and going from the subject properties, Plaintiff looked unhealthy, unhappy, abused, and scared. He had no luggage, was timid and frightened, and was accompanied by a much larger, intimidating man. Sounds of abuse could be heard from the rooms, and the exchanges, violence, and loud yelling of Plaintiff's trafficker were openly visible around the properties.

50. At each location Plaintiff's was trafficked, his trafficker also forced other victims to engage with in commercial sex against their will. Plaintiff recalls seeing other victims both of his trafficker and from other trafficking occurring at the subject locations.

51. These red flags were open and obvious to anyone working at the subject properties and lasted for years.

The Hotel Industry's Role in Sex Trafficking

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52. In 2017, human trafficking was noted as the world's fastest growing crime.[3] While the term "human trafficking" incorporates all forced labor, the sex trafficking industry alone pulls in an estimated $99 billion each year, making it the second largest illicit crime industry behind only the sale of all illegal drugs.[4]

53. The hospitality industry plays a crucial role in the sex trade.[5] Hotels have long profited from their reputations as havens of privacy and discretion for the offending. Despite the known risks and known trafficking crimes, hotels, including the Defendants, offer anonymity and non-traceability to the traffickers, making them ideal venues for crime and sex trafficking in particular. Hotels, including the Defendants, knowingly harbor traffickers, buyers, and victims.

54. Today, sex slavery is pervasive in the United States, and hotels are the primary place where it happens.[6]

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

56. In 2014, 92% of calls received by the National Human Trafficking Hotline involved reports of sex trafficking taking place at hotels. Hotels have been found to account for over 90% of commercial exploitation of children.

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[3] *Human Trafficking Is the World's Fastest Growing Crime*, The Advisory Board (May 22, 2017), https://www.advisory.com/daily-briefing/2017/05/22/human-trafficking.
[4] *Profits and Poverty: The Economics of Forced Labor*, International Labour Organization (May 24, 2014).
[5] Giovanna L. C. Cavagnaro, *Sex Trafficking: The Hospitality Industry's Role and Responsibility*, Cornell University School of Hotel Administration (2017).
[6] Jaclyn Gallucci, *Human Trafficking Is an Epidemic in the U.S. It's Also Big Business*, Fortune (Apr. 2019).

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57. Due to the overall hospitality industry's complacency, complicity, and reckless disregard in addressing the known issue of sex trafficking, hotels are the venue for sex trafficking. Traffickers and buyers capitalize on the hotel industry's general refusal to (1) adopt and enforce companywide anti-trafficking policies from the corporate to the property level, (2) train staff on what to look for and how to respond, and/or (3) establish safe and secure reporting mechanisms for those at the point of sale.

58. Every day, thousands of hotel employees witness manifestations of sex trafficking and commercial exploitation. Thus, the hospitality industry has the greatest reach to prevent, identify, and thwart sexual exploitation where it is most likely to occur.

59. Hotels and motels have the highest obligation to protect their guests from known dangers, including sex trafficking and sexual exploitation, and should be held accountable when they fail to comply. As stated in a publication by the Cornell University School of Hospitality, "the hospitality industry is undoubtedly involved in the sex trafficking industry ... and therefore has an inherent responsibility to deter the crime and can be liable for failing to do so."

60. Even estimates by attorneys for the hospitality industry indicate that eight (8) out of ten (10) arrests for human trafficking occur in or around hotels.[7] The 2016 Trafficking in Persons Report issued by the United States Department of State also confirmed that human trafficking occurs in the hospitality industry in the United States.

61. The complicity of the hospitality industry is essential to the perpetuation of human trafficking, allowing traffickers to remain transient, collect profits, and evade detection. Sex trafficking ventures move from place to place so that they are less visible to

[7] U.S. Dep't of State, *2016 Trafficking in Persons Report*, at 387.

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law enforcement. Similarly, sex traffickers also want to keep their victims moving from place to place to isolate them from any possible means of escape or rescue. Traffickers are well aware of the seclusion and anonymity attendant with booking rooms with certain hotel chains, including the hotel chains named in this Complaint — they know it is unlikely that they will be disturbed.

62. Because of this link between hotels and sex trafficking, government agencies and non-profits have devoted significant efforts to educating the hotel industry, including Defendants, on best practices for identifying and responding to sex trafficking.

63. Multiple agencies and organizations who actively combat sex trafficking, including the United States Department of Homeland Security, the National Center for Missing and Exploited Children, the Polaris Project, and ECPAT, among numerous others, have established recommended policies and procedures for recognizing the signs of sex trafficking.[8]

64. Some of the recommended policies and procedures intended to reduce or eliminate sex trafficking, which Defendants are aware or should be aware of and were aware or should have been aware of at all subject times of the trafficking alleged herein, are specific to the hotel industry. These include learning to identify warning signs and indicators of sex trafficking, including but not limited to:

a. Individuals show signs of fear, anxiety, tension, submission, and/or nervousness;

a. Individuals show signs of physical abuse, restraint, and/or confinement;

b. Individuals exhibit evidence of verbal threats, emotional abuse, and/or being treated in a demeaning way;

[8] U.S. Department of Homeland Security, Blue Campaign, Hospitality Toolkit.

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c. Individuals show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries, and/or unusual behavior;

d. Individuals lack freedom of movement or are constantly monitored;

e. Individuals avoid eye contact and interaction with others;

f. Individuals have no control over or possession of money or ID;

g. Individuals dress inappropriately for their age or have lower quality clothing compared to others in their party;

h. Individuals have few or no personal items — such as no luggage or other bags;

i. Individuals appear to be with a significantly older companion or in the company of older males;

j. A group of individuals appears to be traveling with an older female or male;

k. A group with identical tattoos in similar locations, which may indicate "branding" by a trafficker;

l. Drug abuse or frequent use of "party drugs" such as GHB, Rohypnol, Ketamine, MDMA (Ecstasy), Methamphetamines, Cocaine, and Marijuana;

m. Possession and presence of bulk sexual paraphernalia such as condoms or lubricant;

n. Possession or use of multiple cell phones; and

o. Possession or use of large amounts of cash or pre-paid cards.

65. At all times of trafficking alleged herein, Defendants understood the practical and legal association between commercial sex and sex trafficking in a hotel environment. Defendants knew or should have known that signs of commercial sex

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(prostitution) activity in their hotels were in fact signs of sex trafficking and should have seen signs of the sex trafficking of Plaintiff that was observable by Defendants.

66. Defendants were aware or should have been aware of these signs of sex trafficking when operating, controlling, and managing their hotel properties, including the subject properties, when enacting and enforcing policies and procedures applicable to those hotels, and when training, educating, and supervising the staff of those hotels.

67. Given the prevalence of human trafficking in hotels and the abundance of information about how franchisors, owners, operators, and hotel employees can identify and respond to this trafficking, it has become apparent that the decision of Defendants to continue generating revenue from traffickers without taking reasonable steps to identify and prevent trafficking in their hotels is a conscious decision to financially benefit by supporting and facilitating unlawful sex trafficking.

Parent Hotel Defendants' Control Over Their Locations

68. Parent Hotel Defendants are vicariously liable for the acts, omissions, and knowledge of their Franchisee Defendants staff and/or staff of the subject properties, which are Parent Hotel Defendants' actual agents or subagents.

69. Upon information and belief, it is a standard practice in the hospitality industry, followed by all Parent Hotel Defendants, for parent companies like Parent Hotel Defendants to set exacting brand quality standards reaching everything from the temperature at which coffee shall be served, to the number of pillows that are placed on the beds, to the types of payments accepted, to when, where, and how guests are greeted.

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70. Parent Hotel Defendants provide their Franchisee Defendants with signage on and in front of the building. This is done to assure customers that when they check in, they can expect an experience consistent with the standards of the parent hotel brand. This brand logo is displayed on everything in the hotel, such as pens and paper on the bedside table and staff uniforms worn at the front desk during check-in.

71. Parent Hotel Defendants provide their hotel-branded locations brand name recognition, a marketing campaign, and hotel listings in the Global Distribution System and other online agency databases. They also provide access to their brand-wide central reservation systems, 800 numbers, revenue management tools, brand loyalty programs, and company websites. Therefore, bookings and room reservations are primarily controlled by Parent Hotel Defendants.[9]

72. Parent Hotel Defendants subject Franchisee Defendants to detailed standards and requirements regarding the operation of the Hotel Defendant locations named herein through the franchising agreements, detailed written policies and manuals, and through other formal and informal protocols, directives, mandates, reporting, and expectations imposed by the Parent Hotel Defendants.

73. Upon information and belief, Parent Hotel Defendants require their branded Franchisee Defendants' properties to use a property management system. This system is linked to the Parent Hotel Defendants' corporate network and data center. This is to, among other things, receive reservations and process payment transactions.

[9] Ellen Meyer, *The Origins and Growth of Franchising in the Hotel Industry*, Lodging Magazine (Apr. 10, 2018).

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74. Upon information and belief, per the relevant franchise agreements, Parent Hotel Defendants may enforce their brand standards through periodic inspections of the hotel locations, backed up with the ultimate threat of termination of the agreement.

Motel 6 Location Staff Acted as Actual Agents of G6 Defendants

75. G6 Defendants are vicariously liable for the acts, omissions, and knowledge of their Motel 6 Locations and staff of the locations, including Bitar Defendants' staff, named herein, which are G6 Defendants' actual agents or subagents.

76. G6 Defendants subjected the Motel 6 Locations named herein and the owners and/or operators, including Bitar Defendants, to detailed standards and requirements regarding the operation of the Motel 6 Locations named herein through the franchising agreements, through detailed written policies and manuals, and through other formal and informal protocols, directives, mandates, reporting, and expectations imposed by the G6 Defendants.

77. G6 Defendants obscure the full extent of control they exercise over their franchisees by treating the manuals and certain policies as confidential and proprietary and prohibiting any public disclosure of those policies and manuals. Upon information and belief, the standards that G6 Defendants imposed on the Motel 6 Locations and Bitar Defendants:

a. Did not merely identify quality or outcome standards but instead specifically controlled the means, methods, and tools Motel 6 Location Defendants used at their Motel 6 Locations;

b. Covered virtually all aspects of hotel operations, including internal operating functions;

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c. Dictated the specific manner in which Motel 6 Location Defendants and hotel staff must carry out most day-to-day functions at their Motel 6 Locations; and

d. Significantly exceeded what was necessary for G6 Defendants to protect their registered trademarks.

78. In addition to the ways described above, upon information and belief, G6 Defendants exercised and reserved the right to exercise systemic and pervasive control over Motel 6 Location's day-to-day operation of the subject Motel 6 Locations named herein and the Bitar Defendants, including the following ways:

a. G6 Defendants required franchisees and management of franchised hotels to participate in mandatory training programs, both during onboarding and on an ongoing basis. This training covered all aspects of hotel operations, including aspects of hotel operations that go significantly beyond what would be necessary for G6 Defendants to protect their registered trademarks;

b. G6 Defendants provided training for hotel management and select hotel staff on-site at the Motel 6 Locations selected by G6 Defendants;

c. G6 Defendants required all hotel staff to participate in training it created through an online learning platform it controlled and maintained;

d. G6 Defendants controlled training provided by Motel 6 Location Defendants to hotel staff by dictating the content of that training, providing required content for that training, and dictating the training methods used;

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e. G6 Defendants retained sole discretion to determine whether all training had been completed satisfactorily;

f. For certain products and services that Motel 6 Location Defendants were required to purchase to operate the Motel 6 Locations named herein, G6 Defendants designated approved vendors and prohibited the locations from purchasing goods and services from anyone other than an approved vendor;

g. G6 Defendants required Motel 6 Location Defendants to sign a technology agreement governing the terms under which franchisees must procure and use technical services and software while operating the Motel 6 Locations named herein. Motel 6 Location Defendants were required to install and use certain brands, types, makes, and/or models of hardware, software, peripheral equipment, and support services to perform internal operating functions at the hotel;

h. G6 Defendants set required staffing levels for the Motel 6 Locations named herein;

i. G6 Defendants established detailed job descriptions for all positions in its Motel 6 properties and drafted numerous, detailed policies that referenced these positions and dictated which positions must perform which tasks and how they must do so;

j. G6 Defendants set requirements for the hiring process used by franchisees and oversaw employee discipline processes and termination decisions;

k. G6 Defendants provided benefits for employees of the Motel 6 Location Defendants;

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SAN DIEGO, CA 92108
(619) 771-3473

l. G6 Defendants required Motel 6 Location Defendants to use a customer resource management program maintained and operated by the G6 Defendants;

m. G6 Defendants controlled channels for guests to report complaints or provide feedback regarding the Motel 6 Locations and directly participated in the response and/or supervised the response to customer complaints or other feedback. G6 Defendants retained the right to provide refunds or other compensation to guests and to require Motel 6 Location Defendants to pay associated costs;

n. G6 Defendants generated reports and analysis of guest complaints and online reviews for the subject Motel 6 Locations;

o. G6 Defendants required Motel 6 Location Defendants to use a Guest Relations Application owned, operated, and maintained by G6 Defendants to manage all guest data and information. G6 Defendants could use the backend of this system to analyze data and generate reports;

p. G6 Defendants set detailed requirements for insurance that Motel 6 Location Defendants must purchase and retained the right to purchase insurance for Motel 6 Location Defendants and to bill them directly for that insurance if G6 Defendants determined that they had not purchased adequate insurance;

q. G6 Defendants regularly audited the books and records of Motel 6 Location Defendants;

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(619) 771-3473

r. G6 Defendants conducted frequent and unscheduled inspections of Motel 6 properties, including the Motel 6 Locations named herein;

s. G6 Defendants retained the right to issue fines, require additional training, to impose and supervise implementation of detailed corrective action plans, and to take other steps up to and including termination of any agreements if the Motel 6 Location Defendants violated any of the G6 Defendants' detailed rules, expectations, protocols, or policies, including those that governed day-to-day operations of the Motel 6 Locations named herein;

t. G6 Defendants controlled all marketing for subject Motel 6 Locations and prohibited them from maintaining any online presence unless specifically reviewed and approved by the G6 Defendants;

u. G6 Defendants imposed detailed recordkeeping and reporting requirements on Motel 6 Location Defendants regarding virtually all aspects of hotel operations;

v. G6 Defendants supervised and controlled day-to-day operations of the Motel 6 Locations named herein through detailed information and extensive reports that it obtained through the property management system and other software systems it required Motel 6 Location Defendants to use; and

w. G6 Defendants retained the virtually unlimited right to revise policies or adopt new requirements for the day-to-day aspects of hotel operations.

79. With respect to the Portland Motel 6 located at 3104-06 SE Powell Boulevard, Portland, Oregon, the Bitar Defendants owned and/or operated that property as franchisees of the G6 Defendants, and the Bitar Defendants and the staff of the Portland

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SAN DIEGO, CA 92108
(619) 771-3473

Motel 6 acted as the actual agents or subagents of the G6 Defendants in operating that property and in committing the wrongful acts and omissions alleged herein.

80. With respect to the Motel 6 Troutdale Portland East located at 1610 NW Frontage Road, Troutdale, Oregon, the G6 Defendants directly owned, operated, managed, and controlled that property from approximately 2012 to 2022, with no separate franchisee. Because the G6 Defendants directly owned and operated the Motel 6 Troutdale Portland East, the staff and employees of that property were the direct agents, servants, and employees of the G6 Defendants, acting within the course and scope of their employment, and the G6 Defendants are directly and vicariously liable for the acts, omissions, and knowledge of those staff and employees.

Red Roof Location Defendant and Staff Acted as Actual Agents of Red Roof

81. Red Roof is vicariously liable for the acts, omissions, and knowledge of the Red Roof Location Defendant and the staff of the Red Roof Inn location, including the employees of OM JSNRN Hospitality Group LLC, named herein, which are Red Roof's actual agents or subagents.

82. Red Roof exercises day-to-day control over OM JSNRN Hospitality Group LLC, the subject Red Roof Inn and its other brand hotels through centralized corporate systems, training, policies, and brand standards.

83. Upon information and belief, Red Roof controls the operations of its branded properties, including the subject Red Roof Inn operated by OM JSNRN Hospitality Group LLC, through various means enforced through franchise agreements and other related contracts. Some examples of how Red Roof does this are:

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SAN DIEGO, CA 92108
(619) 771-3473

a. Gathering reports of data generated by branded locations, including reservation, payment, and occupancy information through Red Roof's centralized systems;

b. Requiring each location to keep audit reports and other records;

c. Requiring each location to use Red Roof's property management system;

d. Conducting regular inspections to ensure compliance with agreements;

e. Providing marketing requirements and standardized marketing services for each location;

f. Regulating policies and procedures;

g. Requiring branded hotels to use approved vendors for internet services or other requirements for Wi-Fi access and filtering;

h. Providing training and orientation materials for branded property staff;

i. Imposing insurance coverage requirements; and

j. Regulating room rates.

84. Red Roof manages corporate and branded property training, policies, and procedures on human trafficking, cybersecurity, guest preferences, internet access, cleanliness, and other hotel brand-related policies.

85. Red Roof requires its branded properties, including the subject Red Roof Inn operated by OM JSNRN Hospitality Group LLC, to comply with its corporate policies relating to security and safety, human rights, ethics, corporate governance, and compliance with the law.

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591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

86. OM JSNRN Hospitality Group LLC and the staff of the subject Red Roof Inn acted as the actual agents or subagents of Red Roof in operating the Red Roof Inn and in committing the wrongful acts and omissions alleged herein.

The Independent Owner Defendants Owned, Operated, and Controlled the Dar-Ron Motel and the Del Rancho Motel

87. The Dar-Ron Motel located at 7707 SE 82nd Avenue, Portland, Oregon was at all relevant times independently owned, operated, managed, and controlled by the Dar-Ron Defendants.

88. Del Rancho Motel located at 7622 SE 82nd Avenue, Portland, Oregon was at all relevant times independently owned, operated, managed, and controlled by Defendant K & D Hotel Management LLC.

89. As the owners and operators of these independent motels, the Independent Owner Defendants directly controlled all aspects of the operation of the Dar-Ron Motel and the Del Rancho Motel, respectively, including the hiring, training, supervision, and retention of staff; the policies and procedures governing room rentals, guest conduct, identification requirements, and responses to criminal activity; and the response (or lack thereof) to the open and obvious signs of commercial sex, drug activity, and sex trafficking occurring on their properties.

90. The staff of the Dar-Ron Motel and the Del Rancho Motel were the direct agents, servants, and employees of the Independent Owner Defendants, acting within the course and scope of their employment, and the Independent Owner Defendants are directly and vicariously liable for the acts, omissions, and knowledge of their staff.

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SAN DIEGO, CA 92108
(619) 771-3473

91. The Dar-Ron Motel and the Del Rancho Motel are small properties, each with fewer than twenty rooms, situated directly across SE 82nd Avenue from one another. The Independent Owner Defendants and their family members personally staffed the front desks and cleaned the rooms and were therefore personally and repeatedly present to observe the open and obvious signs of commercial sex, drug use, and trafficking on their properties.

Parent Hotel Defendants Knowingly Benefited from Participation in a Venture with Franchisee Defendants

92. Hotel brands own properties and lend their name and likeness to third-party owners, while the building and operations are under the brands' supervision and control. This is done through brand standards, franchise agreements, and maintaining control over all aspects of operations. This allows the parent brand to exchange the high risk that is inherent in owning an asset like a hotel for the low risk associated with owning a local property or franchise contract and still profit. Because of this, the hotel locations and parent brands — here Parent Hotel Defendants and Franchisee Defendants — are inextricably intertwined.

93. The average customer does not see this relationship. The parent brand gives the franchisee property its identity. The parent brand provides the signage that assures customers that if they check into that hotel they can expect the standards consistent with the parent brand. The parent companies — Parent Hotel Defendants — hold themselves out to the public as the owners of the property. These brand requirements are contractual, with the power to control weighed heavily toward the corporate parent brand.

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SAN DIEGO, CA 92108
(619) 771-3473

94. At all times of trafficking alleged herein and currently, booking and room reservations are controlled by the corporate parent brand.

95. Upon information and belief, at all times of trafficking alleged herein and currently, the franchised hotels typically pay a percentage of their total revenue back to the parent company and are required to develop and maintain the property in accordance with the parent brand's standards as they are laid out in the franchise agreement.

96. Upon information and belief, per the franchise agreements, the Parent Hotel Defendants may enforce standards through periodic inspections and even termination of the franchise agreement if the franchise hotel is found to be inadequate. The right of the Parent Hotel Defendants to enforce their brand standards, including safety standards, is not just their right but their responsibility.

97. At all times of trafficking alleged herein, Parent Hotel Defendants dictated franchisee policies related to safety, security, human trafficking, employee training, and franchisees' response.

98. Upon information and belief, at all times of trafficking alleged herein, reservation information for rooms at the subject hotels passed through a system operated and managed by the parent companies, Parent Hotel Defendants.

Defendants Knowingly Benefited from Participation in the Trafficking of Plaintiff

99. Defendants profited from the sex trafficking of Plaintiff when they rented rooms to Plaintiff and/or his trafficker when they knew or should have known that human trafficking was occurring.

100. Defendants benefited from the steady stream of income that Plaintiff's trafficker brought to their hotels and hotel brands. Defendants profited from each and every

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SAN DIEGO, CA 92108
(619) 771-3473

room that Plaintiff's trafficker rented where Plaintiff was harbored and maintained for the purpose of sex trafficking.

101. Defendants facilitated the trafficking through their practices, policies, and procedures. They failed to take appropriate action to prevent the trafficking of individuals, including Plaintiff, for sex so they could continue to profit from the room rentals and business that trafficking brings.

102. Defendants owned and operated the subject properties while buyers paraded in and out of rooms rented for the purpose of trafficking Plaintiff. Their employees and agents observed and should have observed the buyers parading in and out of its hotel rooms to engage in the sex trafficking of Plaintiff. Their employees and agents observed or should have observed the trafficking occurring regularly and for multiple days at a time at the subject hotel locations but ignored it so they could profit.

103. Plaintiff's trafficking at the subject hotel locations was a result of Defendants' participation in a venture with each other and criminal traffickers. If Defendants had not continued participating in a venture that they knew or should have known violated 18 U.S.C. § 1591(a), they would not have received a benefit from Plaintiff's trafficking at the subject hotel locations.

104. Despite their actual or constructive knowledge that the venture they were engaged in was in violation of 18 U.S.C. §§ 1591(a) and 1595(a) through the conduct of hotel staff and the widespread trafficking at the subject hotel locations named herein, Parent Hotel Defendants participated in the venture by continuing to associate with the hotel staff and with other Hotel Location Defendants to operate the hotel locations named

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SAN DIEGO, CA 92108
(619) 771-3473

herein in a way that they knew or should have known would lead to further violations of 18 U.S.C. § 1591(a), including trafficking of victims like Plaintiff.

105. Defendants participated in this venture through the conduct described herein as they were jointly responsible for relevant aspects of hotel operations.

Defendants Facilitated Trafficking of Plaintiff

106. Defendants had both actual and constructive knowledge of the trafficking of Plaintiff at the hotel locations they owned and operated because the trafficking was the direct result of Defendants facilitating his trafficking at the subject locations.

107. Defendants are responsible for the acts, omissions, and knowledge of all employees of the subject hotel locations when operating the hotel because these acts and omissions were committed in the course and scope of employment. Defendants ratified these acts and omissions because they failed to exercise reasonable care in the hiring, training, and supervision of these employees given the specific risks known and reported to Defendants of sex trafficking occurring at the subject hotel locations.

108. Despite having actual or constructive knowledge of widespread and ongoing sex trafficking at the subject locations, Defendants continued renting rooms to traffickers, including the rooms used to sexually exploit Plaintiff and other victims.

109. Defendants knew or were willfully blind to the fact that Plaintiff was being trafficked and, despite this, benefited from continued association with his trafficker by providing him with a venue, in the form of hotel rooms and related services, to harbor and facilitate Plaintiff's sexual exploitation.

110. Defendants also facilitated widespread trafficking at their hotel locations, including the trafficking of Plaintiff, in ways including:

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(619) 771-3473

a. Allowing inappropriate and inadequate practices for hiring, training, supervising, managing, and disciplining front-line staff regarding issues related to human trafficking;

b. Inadequate and inadequately enforced sex trafficking notice and training for hotel staff;

c. Choosing not to report known or suspected criminal activity including sex trafficking according to reasonable practices, industry standards, laws, and/or applicable franchisor policies and procedures; and

d. Implicitly encouraging the activities of traffickers by creating an environment where they did not need to incur the burden of taking significant steps to conceal their activities but, instead, could operate without concern for detection or interference by the hotel staff.

Parent Hotel Defendants Facilitated the Trafficking of Plaintiff at their Properties

111. Upon information and belief, during the times Plaintiff was trafficked at the subject properties, Parent Hotel Defendants participated directly in aspects of the operation of those subject hotels that influenced whether and to what extent trafficking occurred at the hotels, including but not limited to the trafficking of Plaintiff, as follows:

a. Parent Hotel Defendants assumed responsibility and control over the human trafficking response of their subject hotel properties, including design and implementation of practices to prevent trafficking, safety and security procedures, employee and franchisee education, training and response, partnership with external organizations, and advocacy;

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SAN DIEGO, CA 92108
(619) 771-3473

b. Parent Hotel Defendants retained control over when their branded hotels would share information with law enforcement and when law enforcement would be contacted about suspected criminal activity in their branded hotel locations;

c. Parent Hotel Defendants retained control over determining which hotels needed additional training or other resources on the risk of trafficking occurring and other related criminal activity;

d. Parent Hotel Defendants retained control to terminate hotel staff and/or a franchising agreement based on the response to human trafficking;

e. Parent Hotel Defendants determined whether the training is provided, when it is provided, the content of the training, how the training is delivered, who receives it, and the consequences of someone not participating or failing to follow such training; and

f. Parent Hotel Defendants retained control over setting, supervising, overseeing, and enforcing policies and procedures for housekeeping services at the subject hotel locations, including how often rooms must be entered, how to respond to guest refusals of entry into rooms, and steps to monitor guest safety issues through housekeeping services.

112. As a direct and proximate result of these egregious practices on the part of the Parent Hotel Defendants, Plaintiff and other victims of sex trafficking and exploitation have been permanently injured and damaged physically, emotionally, psychologically, and financially.

Defendants' Knowledge of Sex Trafficking at Their Locations

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SAN DIEGO, CA 92108
(619) 771-3473

113. Defendants' knowledge is not limited to a general awareness of the problem of sex trafficking in the hotel industry. Defendants have known, since well before the named Plaintiff was trafficked, that sex trafficking was ongoing and widespread at their branded and owned properties, including the subject properties named herein.

114. Use of the Defendants' branded and owned properties for sex trafficking is well known to Defendants. Upon information and belief, before and at the time Plaintiff was trafficked at the subject properties, each of the Defendants monitored criminal activity occurring at the hotels and were aware of activity indicating commercial sex, sex trafficking, and related crimes occurring at those hotels, including the specific hotel properties where Plaintiff was trafficked.

115. Defendants knew staff at their properties were facilitating sex trafficking and that they were generating revenue through policies that encouraged sex traffickers to operate at their properties, including but not limited to not implementing policies and procedures known to be necessary to stop known trafficking; not requiring identification cards or "IDs"; allowing daily payments of cash for extended stays; complying with requests for rooms to be rented away from other guests; allowing traffickers to escort bruised and battered victims to rooms without IDs; allowing several buyers to come in and out of the rooms victims were trafficked in without ID; ignoring yelling and screaming from rooms where trafficking took place; ignoring obvious copious amounts of sex paraphernalia; not addressing the trafficking signs and reports of drugs, abuse, and prostitution; forming relationships with traffickers and treating traffickers like "regulars" with benefits by accommodating specific requests that entail known signs of trafficking and not reporting the trafficking or taking any steps to prevent or stop it.

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591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

116. Defendants have access to reviews left by guests on websites wherein guests frequently complain about the prevalence of obvious trafficking, hearing physical violence by traffickers, and other signs of trafficking.

117. Information that has become public through news stories establishes the entrenched and pervasive nature of Defendants' role in providing a venue where sex trafficking has continued unabated for years. Defendants have provided the means necessary for traffickers to traffic victims, including Plaintiff.

118. During the period Plaintiff was trafficked at the subject locations named herein, there were obvious signs that his trafficker was engaged in sex trafficking.

119. Other victims were trafficked at the same hotels at the same time as Plaintiff.

120. Plaintiff's trafficker was often present with Plaintiff at check-in and would linger around the hotel or in the parking lot while Plaintiff was forced to have sex with customers at the subject hotels. This was all in plain sight of Defendants' employees at the subject locations. Plaintiff's trafficker could be seen leaving the room when another male arrived and then returning as soon as that male left. This would happen multiple times a day, every day, for years.

121. There was heavy foot traffic in and out of the rooms where Plaintiff was being harbored. This foot traffic involved men who were not hotel guests. Several men came in and out of the subject hotel rooms in a single day. These individuals entered and left at unusual hours and were present at the hotel for brief periods of time. Their comings and goings were visible to hotel employees that were located at front desks and around the property. A reasonable hotel would have seen these regular "red flag" interactions at their

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SAN DIEGO, CA 92108
(619) 771-3473

property in plain sight, and Defendants should have seen it by and through their employees and agents.

122. There were obvious signs consistent with trafficking which included well-known "red flags" for trafficking in a hotel, such as condoms, sex paraphernalia, and lingerie. These things were not only visible to but must have been seen by hotel employees entering and cleaning the rooms or even just collecting the trash.

123. When forced into coming and going from the subject hotel locations, Plaintiff looked unhealthy, unhappy, abused, and scared. His trafficker and/or associates were always watching him, and his noticeable demeanor was visible to hotel employees he passed by.

124. Upon information and belief, multiple employees at the subject hotel locations named herein, including management-level employees, observed or were made aware of these obvious signs of trafficking while acting within the scope and course of their employment.

125. As such, Defendants knew or were willfully blind to the fact that Plaintiff was being trafficked at the subject hotel locations named herein.

126. A brief examination of just a handful of examples for each Defendant suffices to show the extraordinary frequency with which Defendants have long received and continue to receive evidence and reports that human trafficking is a known issue at their hotel locations.

G6 Defendants' Knowledge of Sex Trafficking at Their Locations

127. A Los Angeles Motel 6 became such a hub for human trafficking and other criminal activity that they paid to settle a public nuisance lawsuit related to such trafficking

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SAN DIEGO, CA 92108
(619) 771-3473

filed by the City of Los Angeles.[10]The Los Angeles nuisance settlement required Motel 6 to change policies that were facilitating sex trafficking. G6 Defendants knew from that lawsuit, from many prior lawsuits, and from their personal knowledge about sex trafficking at their properties that their policies were facilitating sex trafficking. Based on information and belief, at all times relevant in this Complaint and currently, G6 Defendants have failed to adequately implement and enforce such changes.

128. Public statements of G6 Defendants confirm that they knew before and during the sex trafficking of Plaintiff that sex trafficking is a problem in the hotel industry, sex trafficking was occurring at their branded hotels, and that they retained control over the response of their branded hotels to this problem. G6 Defendants recognized that "[t]raffickers often use hotels and motels for sex trafficking activities due to the privacy extended to guests."[11] They also acknowledged the significant role G6 Defendants have in deterring, detecting, and disrupting sex trafficking in their branded hotels.

129. G6 Defendants acknowledge on their website that they control the policies, procedures, training, and codes of conduct that have facilitated sex trafficking at their Motel 6 brand hotels, including the subject Motel 6 Location Defendants' properties where Plaintiff was trafficked and abused.[12]

130. Among some of the notable press involving frequent use of G6 hotels for illegal trafficking activity, the following was noted:

[10] *Motel 6 Pays $250,000 to Settle Human Trafficking Suit*, CBS News (Aug. 31, 2017).
[11] G6 Hospitality Anti-Human Trafficking Training, http://g6propertycollateral.com/.
[12] https://g6hospitality.com/combating-human-trafficking/

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591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

a. In late 2003, a trafficker set up a sex trafficking venture at a Motel 6 in Connecticut in which two (2) young women were sold for sex eight (8) to ten (10) times per day.

b. In April 2009, a sex trafficking venture operated out of a Motel 6 in Toledo, Ohio.

c. In approximately September 2011, sex traffickers set up an operation at a Motel 6 in Toledo, Ohio to sell fifteen (15) and sixteen (16) year old girls for sex.

d. From approximately 2012 through October 2014, two (2) men engaged in a criminal sex trafficking venture of children which operated in part out of a Motel 6 in Harvey, Illinois.

e. Police rescued an eighteen (18) year old girl from a sex trafficker in February 2012, at a Motel 6 in Portland, Oregon.

f. The FBI investigated and arrested several individuals in December 2012 for the victimization and human trafficking of several young women and a juvenile at a Motel 6 in Madison, Alabama.

g. The Orange County Human Trafficking Task Force busted a criminal enterprise in December 2012 that was selling women for sex out of a Motel 6 in Anaheim, California.

h. Two men were arrested in March 2015 for sex trafficking a fifteen (15) year old girl at a Motel 6 in Austin, Texas.

i. In March 2015, police arrested a man for sex trafficking a runaway seventeen (17) year old at a Motel 6 in Warwick, Rhode Island.

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591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

j. Over a fourteen (14) month period ending in approximately April 2015, the same Motel 6 in Warwick, Rhode Island had seventy-five (75) arrests on its property for crimes including sex trafficking.

k. Seven (7) people were indicted in January 2016 by a Colorado grand jury for sex trafficking children from 2014 through the summer of 2015, out of hotels in Denver, Colorado, including a Denver-area Motel 6.

l. In the summer of 2015, a woman was arrested at a Motel 6 in Great Falls, Montana where she was involved in sex trafficking a seventeen (17) year old girl.

m. A married couple was indicted in June 2015 for their roles in sex trafficking minor children ages seventeen (17), sixteen (16), and fifteen (15) years old out of a Motel 6 in Everett, Washington.

n. In Tuscaloosa, Alabama police rescued a fourteen (14) year old girl from a Motel 6 in June 2015, and a grand jury subsequently charged her assailant with human trafficking and rape.

o. In approximately July 2015, sex traffickers sold a fifteen (15) year old girl for sex at a Motel 6 in Pismo Beach, California.

p. In approximately March 2013, sex traffickers began operating a sex trafficking venture out of Motel 6 Locations in Bangor and Portland, Maine.

131. This sampling of news stories, reviews, and other public information establishes that, at the time Plaintiff was trafficked at the subject properties, G6 Defendants and Motel 6 Location Defendants knew or should have known that:

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SAN DIEGO, CA 92108
(619) 771-3473

a. There was widespread and ongoing sex trafficking occurring at the G6 branded properties;

b. Sex trafficking was a brand-wide problem for G6 Defendants;

c. G6 franchisees and hotel staff were not taking reasonable steps to identify, report, and respond to known or probable sex trafficking occurring at their hotel properties and were facilitating sex trafficking and harboring trafficking at the branded hotel properties; and

d. G6 and its franchisees were earning revenue by providing venues where widespread and ongoing sex trafficking was occurring.

132. G6 Defendants and Motel 6 Location Defendants were specifically aware that sex trafficking was widespread and ongoing at the subject Motel 6 Locations.

The Portland Motel 6 (G6 Defendants and the Bitar Defendants)

133. 158. Plaintiff was trafficked at the Portland Motel 6, 3104-06 SE Powell Boulevard, Portland, Oregon, on at least fifty (50) separate occasions between approximately 2016 and 2019.

134. The Portland Motel 6 experienced heavy short-stay traffic; Plaintiff's trafficker frequently obtained rooms toward the rear of the property; and the property was equipped with surveillance cameras monitored, or intended to be monitored, by staff. The property was known for commercial sex and drug activity and had acquired the local nickname "murder motel."

SINGLETON SCHREIBER
591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

135. Portland Motel 6 employees would give Plaintiff and his trafficker a room toward the back of the property to keep the trafficking in an isolated area of the hotel away from other guests.

136. Plaintiff witnessed other victims being trafficked at the property while he was there with his trafficker. Plaintiff also recalls many hotel guests sold drugs at this location.

137. Plaintiff recalls the employees at the Portland Motel 6 did not require guests, including hotel guests and unregistered guests to show IDs when checking in or entering the hotel.

138. Internet reviews for the Portland Motel 6, which G6 Defendants and the Bitar Defendants managed, controlled, and monitored, show the pervasiveness of sex trafficking, commercial sex, and drug activity before and during the time Plaintiff was trafficked. For example, guests reported:

a. "[d]rug addicts, prostitutes and unruly people" with management "[o]nly interested in the money"

b. being "roomed next to prostitutes" with an infant;

c. "pimps sitting on top of their cars in the parking lot yelling at the hookers" while "[t]he nightshift manager stayed locked in his office";

d. "a pimp checking in with one of the prostitutes";

e. "[h]ookers all over the place and in [the] office";

f. a stay titled "BEWARE (drugs and prostitutes)" with "[c]ops . . . there both evenings";

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SAN DIEGO, CA 92108
(619) 771-3473

g. “sex working going on out of rooms" and "[d]omestic [a]ssault outside"; an observation that "looks like there is human trafficking here";

h. "obvious sex work that was unsafe for all";

i. the "murder motel" nickname; and

j. needles and needle caps and a reference to the property as "a crack shack”.

139. The volume of criminal activity at the Portland Motel 6 is further reflected in law enforcement records. A Portland Police Bureau General Offense Report synopsis for 3104 SE Powell Boulevard reflects two hundred fifty-two (252) records of police activity at the Portland Motel 6 between January 1, 2013 and December 31, 2019, including a homicide, an attempted murder, a firearm-pointed offense, a carjacking, a robbery, numerous drug offenses and drug-house complaints, aggravated and simple assaults, weapons offenses, warrants, burglary, arson, felony eluding, criminal threats, domestic disturbances, and death investigations.

140. The Portland Motel 6 has also been the site of serious violent crime reported in the news. In April 2017, a 42-year-old woman was found strangled to death in a room at the Motel 6 near SE 31st Avenue and Powell Boulevard.

141. On February 22, 2023, a 27-year-old man was fatally shot at the Motel 6 on SE Powell Boulevard; his assailant was later sentenced to eighteen years in prison.

142. And in November 2015, a father was arrested after leaving his two young children alone in a filthy room at the Motel 6 at 3104 SE Powell Boulevard while high on heroin, with drug pipes in the room.

The Motel 6 Troutdale Portland East (G6 Defendants)

SINGLETON SCHREIBER
591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

143. Plaintiff was trafficked at the Motel 6 Troutdale Portland East, 1610 NW Frontage Road, Troutdale, Oregon, on at least twenty-five (25) separate occasions between approximately 2016 and 2019.

144. Plaintiff is certain that the staff of the Motel 6 Troutdale Portland East were aware of the trafficking occurring on the property, given the kind of people and the constant traffic coming and going. The property, located on a main highway near two truck stops, had a great deal of criminal activity occurring on it.

145. Internet reviews for the Motel 6 Troutdale Portland East, which G6 Defendants managed, controlled, and monitored, show the pervasiveness of sex trafficking, commercial sex, and drug activity before and during the time Plaintiff was trafficked, and expressly reference human trafficking.

a. One reviewer wrote: "John's, prostitutes and Crack heads oh my! . . . Pimps waiting outside rooms, ho's working, drug deals in plain sight!"

b. Another wrote: "There seems to be human trafficking going on here and there's a sign up about it in the lobby. There was a woman being loudly beaten in the room above us all night by a male."

c. Another wrote that "they don't enforce rules even the sex trafficking one. You should see how many weird men come in trying to get you in the vehicle," and described "[p]imps and drugs everywhere."

146. Additional guest reviews of the Motel 6 Troutdale Portland East describe:

a. A woman screaming that she was bleeding while being beaten, with staff and police failing to respond and a reviewer concluding "these people live here prostituting and meth dealing";

SINGLETON SCHREIBER
591 CAMINO DE LA REINA, STE. 1025
SAN DIEGO, CA 92108
(619) 771-3473

b. Being "propositioned by a prostitute" with a used condom found under the bed; "Hookers, Drug dealers";

c. A "drug hooker den" (Motel 6 Troutdale Portland East Reviews at 21) ; "prostitutes . . . all over the place";

d. "active prostitution . . . happening during our stay";

e. "women of the night . . . making money" and a stolen meth pipe;

f. “four raids" in a six-day stay and a note that "[d]rugs will be offered";

g. and a man choking a woman and attempting to throw her over a banister with "zero visible security presence".

147. The Motel 6 Troutdale Portland East has also been the site of serious violent crime reported in the news. On April 15, 2021, a man was shot during a fight at the Motel 6 on Frontage Road in Troutdale, following a carjacking and shooting at the same motel earlier that month.

148. In November 2021, two individuals found passed out in a car in the Motel 6 parking lot rammed a sheriff's deputy's patrol car; deputies recovered a loaded handgun, drugs, and a stolen catalytic converter.

Red Roof’s Knowledge of Sex Trafficking at Their Locations

149. An exposé from The Independent mapped 42 federal lawsuits brought by survivors of human trafficking against Red Roof across the country, spanning 39 states and 117 Red Roof Inn locations.[13]

[13] *The Shocking Scale of Sex Trafficking Allegations at Red Roof Inn Hotels Across the United States*, The Independent (July 12, 2024).

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150. In June 2024, the first sex trafficking trial against a national hotel brand showcased Red Roof. The eleven survivor plaintiffs settled with Red Roof midway into trial. A key piece of evidence was an email from a regional vice president of operations who joked that "my pimps and hos love them some snacks to go with their smokes."[14]

151. Public statements of Red Roof confirm that it knew that sex trafficking is a problem in the hotel industry, and that Red Roof, as a parent hotel brand, plays a role in the prevention of human trafficking on hotel properties. For example, in 2022, Red Roof launched a fundraising campaign with ECPAT-USA, a national anti-child trafficking organization.[15]

152. Among some of the notable press involving frequent use of Red Roof Inn hotels for illegal trafficking activity, the following was noted:

a. In October 2013, a man was arrested in connection with a human trafficking and prostitution ring at a Red Roof Inn in Hanover, Massachusetts.

b. Police arrested two individuals for the trafficking of minors, including a 14 year old girl, at a Red Roof Inn in Charlotte, North Carolina in October 2015.

c. In Lubbock, Texas, five individuals were arrested at a Red Roof Inn for participating in a human trafficking ring involving minors in 2014.

d. In September 2012, a trafficker was prosecuted for the child sex trafficking of a 17 year old girl at a Red Roof Inn in Miami, Florida.

[14] *Red Roof Inn Settles with Victims in Historic Sex Trafficking Case, Lawyer Says*, Fox 5 Atlanta (June 28, 2024); *Red Roof Inn Manager Joked About "Pimps and Hos" While Sex Trafficking Was Rampant at Hotels, Lawsuit Claims*, AOL (July 5, 2024).
[15] *Red Roof and ECPAT-USA Launch Fundraising Campaign at the Hotel Industry's AAHOACON 2022 Conference*, PR Newswire (Apr. 13, 2022).

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e. A man was arrested for human trafficking of a woman at a Red Roof Inn in Knoxville, Tennessee in September 2012.

f. Over the course of a year in 2014 and 2015, eighteen men were arrested during prostitution and human trafficking stings at a Red Roof Inn in Woodbury, Minnesota.

g. In January 2018, a woman was arrested for the sex trafficking of a 17 year old child at a Red Roof Inn in St. Charles, Missouri.

153. This sampling of news stories, reviews, and other public information establishes that, at the time Plaintiff was trafficked at the subject properties, Red Roof and the Red Roof Location Defendant knew or should have known that:

a. There was widespread and ongoing sex trafficking occurring at Red Roof's branded properties;

b. Sex trafficking was a brand-wide problem for Red Roof;

c. Red Roof's franchisees and hotel staff were not taking reasonable steps to identify, report, and respond to known or probable sex trafficking occurring at their hotel properties and were facilitating sex trafficking and harboring trafficking at the branded hotel properties; and

d. Red Roof and its franchisees were earning revenue by providing venues where widespread and ongoing sex trafficking was occurring.

The Portland Red Roof Inn (Red Roof and OM JSNRN Hospitality Group LLC)

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SAN DIEGO, CA 92108
(619) 771-3473

154. Plaintiff was trafficked at the Red Roof Inn, 3828 NE 82nd Avenue, Portland, Oregon, on numerous and repeated occasions between approximately 2016 and 2019.

155. Plaintiff recalls frequently seeing a Black man who regularly worked the front desk. This employee witnessed the steady stream of unregistered male guests coming in and out of Plaintiff's rooms. Each time a male entered, Plaintiff's trafficker would wait outside the door.

156. At the Portland Red Roof Inn, the maintenance workers — an older couple who appeared to live on site — were friendly with Plaintiff's trafficker and purchased methamphetamine from him. It was openly apparent that guests were present for drugs or commercial sex, with constant short-stay traffic that staff did not question or report.

157. Internet reviews for the Portland Red Roof Inn, which Red Roof and the Red Roof Location Defendant managed, controlled, and monitored, show the pervasiveness of sex trafficking, commercial sex, and drug activity before and during the time Plaintiff was trafficked. For example, guests reported:

a. The location was the place to go "[i]f you are looking to purchase drugs, children, 'adult services";

b. "[t]here is prostitution going on there" and "[t]he front desk staff [are] friends with the shady people looking into your car windows";

c. "[h]omicide detectives [were] in the lobby for two days talking to staff about a murder that occurred there"

d. "6 cops" were in and out and "the room next door was either having an orgy or pimping out people," in a neighborhood "loaded with strip clubs";

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(619) 771-3473

e. a "drug dealer or pimp . . . in the next room . . . in and out of the room every 10-30 min";

f. "free used [needles] . . . outside";

g. a property "full of tweakers and hookers";

h. Results for "crack house" when the property was searched online; and

i. "a pile of drugs in plain sight that were overlooked by the house keeping staff"

158. The volume of criminal activity at the Red Roof Inn is further reflected in law enforcement records. A Portland Police Bureau General Offense Report synopsis for 3828 NE 82nd Avenue reflects two hundred seventy-seven (277) records of police activity at the Red Roof Inn between January 1, 2013 and December 31, 2019, including larceny, drug offenses, warrants and fugitive apprehensions, assault, vandalism, robbery, and family offenses.

159. The Red Roof Inn has also been the site of serious violent crime reported in the news.

a. On February 27, 2017, a man who had solicited a woman for commercial sex raped her at the Red Roof Inn, 3828 NE 82nd Avenue, and — in immediate flight from that rape — killed a nearby resident; he was later sentenced to life in prison.

b. In October 2017, a Portland Police Bureau officer responding to a reported drug deal at 3828 NE 82nd Avenue observed two vehicles flee the Red Roof Inn property, and the driver rammed the officer's cruiser before fleeing. (Driver Arrested After Ramming Police Car In NE Portland at 1)

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The Dar-Ron Motel Defendants' Knowledge of Sex Trafficking

160. Plaintiff was trafficked at the Dar-Ron Motel on at least fifty (50) separate occasions between approximately 2016 and 2019. Plaintiff's trafficker was present for most of these occasions.

161. The Dar-Ron Defendants have known, since well before Plaintiff was trafficked, that sex trafficking, commercial sex, drug activity, and related crimes were ongoing and widespread at the Dar-Ron Motel in particular.

162. Plaintiff recalls that he and his trafficker were regulars at the hotel. Many of the staff members recognized Plaintiff and his trafficker.

163. Staff at the Dar-Ron would give Plaintiff's trafficker a discount on rooms.

164. The Dar-Ron Motel sits on SE 82nd Avenue, a corridor long known as a hotspot for prostitution, drug activity, and sex trafficking, and known as such for years.

165. The Portland Police Bureau has identified the motels along SE 82nd Avenue — including the Dar-Ron Motel — as locations generating numerous calls for service associated with human trafficking and other crimes.

166. The Dar-Ron Motel is a small property with fewer than twenty rooms. Mukesh R. Patel and his family personally owned and operated the motel, personally worked the front desk, and personally cleaned the rooms, and were therefore frequently present at the property and saw and heard the open and obvious signs of sex trafficking occurring there, including the trafficking of Plaintiff.

167. Dar-Ron Defendants knew staff at the Dar-Ron Motel were participating in and facilitating sex trafficking and that the motel was generating revenue through policies that encouraged sex traffickers to operate there, including not requiring identification,

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SAN DIEGO, CA 92108
(619) 771-3473

allowing daily cash payments for extended stays, "blacking out" rooms as "closed for maintenance" and quietly assigning those rooms to Plaintiff's trafficker, accepting drugs from Plaintiff's trafficker in exchange for room access, providing Plaintiff's trafficker an discounted rate, and treating Plaintiff's trafficker as a "regular."

168. Upon information and belief, the Dar-Ron Defendants had access to and read the online reviews of the Dar-Ron Motel, which directly put the Dar-Ron Defendant on notice of red flags of sex trafficking. Those reviews reported:

a. "[p]rostitutes and drug dealers walk right up to you offering to sell you drugs or asking you if you want a date," with "[c]ops driving all up and down 82nd all night long";

b. "the management rents to anyone and everybody drug trafficking and prostitution, everyday all day all night people knocking at your door"

c. "working gals by the dozen" ;

d. a "syringe sitting on the door jam" with "hookers and people who very much looked like they were gang affiliated";

e. "infested with gang activity"

f. "parking lot is a playground for drug addicts";

g. Homeless individuals "selling drugs out there car next to hotel"; and

h. "[t]oo much crime going on around you".

169. The volume of criminal activity at the Dar-Ron Motel is further reflected in law enforcement records. A Portland Police Bureau General Offense Report synopsis for 7707 SE 82nd Avenue reflects sixty-two (62) records of police activity at the Dar-Ron Motel between January 1, 2013 and December 31, 2019, including warrants and fugitive

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SAN DIEGO, CA 92108
(619) 771-3473

apprehensions, simple and aggravated assault, drug offenses, drug-house complaints, gang activity, failure to register as a sex offender, robbery, prohibited possession of a weapon, and death investigations.

170. The Dar-Ron Motel has also been the site of serious violent crime reported in the news. This has been an ongoing pattern, even after Plaintiff's trafficking ended. On January 19, 2024, a 25-year-old man, Rametheus Clenese Hill, was shot and killed in the parking lot of the Dar-Ron Motel; investigators observed a bullet hole in the window of motel room #202, eleven Portland Police Bureau personnel responded, and SE 82nd Avenue was closed for the investigation.

171. At all times relevant, from approximately 2016 to 2019, the Dar-Ron Defendants profited and directly benefited from the room rentals and other things of value obtained as a direct result of his participation in the sex trafficking venture with Plaintiff's trafficker. The Dar-Ron Defendants made an active choice not to call the police or notify law enforcement about the trafficking that they knew was occurring at the Dar-Ron Motel.

The Del Rancho Motel (K & D Hotel Management LLC) Knowledge of Sex Trafficking

172. Plaintiff was trafficked at the Del Rancho Motel on at least fifty (50) separate occasions between approximately 2016 and 2019. Plaintiff's trafficker was present for most of these occasions.

173. Staff at the Del Rancho would give Plaintiff's trafficker a discount on rooms.

174. K & D Hotel's knowledge is not limited to a general awareness of the problem of sex trafficking in the hotel industry. K & D Hotel has known, since well before

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SAN DIEGO, CA 92108
(619) 771-3473

Plaintiff was trafficked, that sex trafficking, commercial sex, drug activity, and related crimes were ongoing and widespread at the Del Rancho Motel in particular.

175. The Del Rancho Motel sits directly across SE 82nd Avenue from the Dar-Ron Motel, on a corridor long known as a hotspot for prostitution, drug activity, and sex trafficking. The Portland Police Bureau has identified the motels along SE 82nd Avenue — including the Del Rancho Motel — as locations generating numerous calls for service associated with human trafficking and other crimes.

176. The Del Rancho Motel is a small property with fewer than twenty rooms. The owners and operators of the Del Rancho Motel personally staffed the front desk and personally cleaned the rooms, and were therefore frequently present at the property and saw and heard the open and obvious signs of sex trafficking occurring there, including the trafficking of Plaintiff.

177. K & D Hotel knew staff at the Del Rancho Motel were participating in and facilitating sex trafficking and that the motel was generating revenue through policies that encouraged sex traffickers to operate there, including not requiring identification, allowing daily cash payments for extended stays, "blacking out" rooms as "closed for maintenance" and quietly assigning those rooms to Plaintiff's trafficker, accepting drugs from Plaintiff's trafficker in exchange for room access, providing Plaintiff's trafficker an unexplained discounted rate, and treating Plaintiff's trafficker as a "regular."

178. K & D Hotel had access to and read the online reviews of the Del Rancho Motel, which directly put K & D Hotel on notice of red flags of sex trafficking. Those reviews reported:

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SAN DIEGO, CA 92108
(619) 771-3473

a. "they don't care if your a working girl and you can come in and out all night with different men to please";

b. Hotel was "known for being a 'prostitution house," with meth sales;

c. The "owner is involved in some sort of prostitution ring, giving the homeless women rooms for their vouchers and making them work cash to pay for the room," with three drug overdoses in one week;

d. "so many drug deals and so much prostitution," which "[t]he staff just ignored";

e. "the owners/managers turn a blind eye" to "hookers and drug dealers";

f. "the manager allowing prostitution theft and drug deals drug use . . . in the open";

g. "prostitutes in parking lot";

h. "drug trafficking taking place throughout the night in the parking lot"

i. Used syringes and a used condom in the room; and

j. "management needs to be prosecuted for aiding all the drug and criminal activities",

179. The volume of criminal activity at the Del Rancho Motel is further reflected in law enforcement records. A Portland Police Bureau General Offense Report synopsis for 7622 SE 82nd Avenue reflects ninety (90) records of police activity at the Del Rancho Motel between January 1, 2013 and December 31, 2019, including warrants and fugitive apprehensions, narcotic activity, aggravated and simple assault, drug offenses, trespassing, a juvenile runaway, criminal threats, failure to register as a sex offender, death

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SAN DIEGO, CA 92108
(619) 771-3473

investigations, possession of a weapon by an ex-convict, numerous domestic disturbances, and a justifiable homicide.

180. The Del Rancho Motel has also been the site of serious violent crime reported in the news. On October 10, 2018, a man held a woman hostage at knifepoint in a room at the Del Rancho Motel and was fatally shot by a Portland Police Bureau officer following a standoff.

181. At all times relevant, from approximately 2016 to 2019, the K & D Hotel profited and directly benefited from the room rentals and other things of value obtained as a direct result of its participation in the sex trafficking venture with Plaintiff's trafficker. K & D Hotel made an active choice not to call the police or notify law enforcement about the trafficking that it knew was occurring at the Del Rancho Motel.

Defendants Are Jointly Responsible for the Trafficking of Plaintiff

182. Defendants were participants in a joint venture with each other, which involved a common enterprise, profit-sharing, a community of interest, and joint rights of control and management, and are vicariously liable for the violations of the other participants in the joint venture. Upon information and belief, the operation of the subject hotels was part of a single unified operation by Defendants.

183. Upon information and belief, the subject hotel locations shared common parent companies or common ownership, were subject to joint control, and operated as an integrated enterprise and/or as alter-egos.

184. Upon information and belief, Defendants acted jointly to own, operate, control, manage, and supervise the subject hotel locations. As an integrated enterprise

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SAN DIEGO, CA 92108
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and/or joint venture, Defendants were separately and jointly responsible for compliance with all applicable laws.

Defendants Are Jointly and Severally Liable for Plaintiff's Damages

185. The venture or ventures in which each Defendant participated were direct, producing, and proximate causes of the injuries and damages to Plaintiff.

186. Under the TVPRA, Defendants are jointly and severally liable for all damages that a jury awards to Plaintiff for past and future losses he suffered as a proximate result of his sexual exploitation and trafficking.

CAUSES OF ACTION AGAINST DEFENDANTS

Count I — Perpetrator Liability Under 18 U.S.C. § 1595(a) Based on Violation of 18 U.S.C. § 1591(a) (Against All Defendants)

187. Plaintiff realleges and incorporates by reference the allegations in above paragraphs though fully set forth herein.

188. Plaintiff is a victim of sex trafficking within the meaning of 18 U.S.C. §§ 1591 and 1595(a) and is thus entitled to bring a civil action under 18 U.S.C. § 1595(a) against the "perpetrator" of any violation of the TVPRA.

189. Defendants are perpetrators within the meaning of 18 U.S.C. § 1595(a) because they:

190. Violated 18 U.S.C. § 1591(a)(1) when, through the acts and omissions described throughout this Complaint, they harbored individuals, including Plaintiff, knowing or in reckless disregard of the fact that the victims would be caused, through force,

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(619) 771-3473

fraud, or coercion, to engage in commercial sex acts while at their respective hotel properties; and

191. Violated 18 U.S.C. § 1591(a)(2) when, through the acts and omissions described throughout this Complaint, they knowingly received a financial benefit by knowingly assisting, supporting, or facilitating a venture that was engaged in violations under 18 U.S.C. § 1591(a)(1) at their respective hotel properties.

192. Violations of 18 U.S.C. § 1595(a) by each of the Defendants as "perpetrators" operated, jointly with the other unlawful acts and omissions alleged in this Complaint, to cause Plaintiff to suffer substantial physical and psychological injuries and other damages as a direct and proximate result of being trafficked and sexually exploited at the Defendants' hotel properties.

Count II — Beneficiary Liability Under 18 U.S.C. § 1595(a)
(Against All Defendants)

193. Plaintiff realleges and incorporates by reference the allegations in paragraphs above as though fully set forth herein.

194. Plaintiff is a victim of sex trafficking within the meaning of 18 U.S.C. §§ 1591 and 1595(a) and is thus entitled to bring a civil action under the "beneficiary" theory in 18 U.S.C. § 1595(a) against anyone who knowingly benefited from participation in a venture that the person knew or should have, with reasonable diligence, known was engaged in a violation of the TVPRA.

195. Through acts and omissions described throughout this Complaint, Defendants received a financial benefit from participating in a venture with each other and traffickers, including Plaintiff's trafficker, despite the fact that each Defendant knew or

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(619) 771-3473

should have known that this trafficker was engaged in violations of 18 U.S.C. § 1591(a)(1) and 18 U.S.C. § 1591(a)(2) at Defendants' properties, including the subject locations alleged in this Complaint.

196. As more specifically alleged above, Parent Hotel Defendants and Hotel Location Defendants took part in a common undertaking and enterprise involving risk and potential profits, and here, actual profits resulted. Parent Hotel Defendants' and Hotel Location Defendants' employees had a direct association with the trafficker and knowingly facilitated the trafficker, which, as shown more thoroughly in the incorporated allegations above, showed a continuous business relationship between the trafficker and Defendants such that the pattern of conduct appears to be a tacit agreement between them. Thus, Defendants are liable as a beneficiary under 18 U.S.C. § 1595(a).

197. Through the acts and omissions described throughout this Complaint, Defendants received a financial benefit from participating in a venture with each other in the operations of their respective hotel properties even though Defendants knew or should have known that this venture was violating 18 U.S.C. §§ 1591(a) and 1595(a).

198. Violations of 18 U.S.C. § 1595(a) by Defendants as "beneficiaries" operated, jointly with the other unlawful acts and omissions alleged in this Complaint, to cause Plaintiff to suffer substantial physical and psychological injuries and other damages because of being trafficked and sexually exploited at the Defendants' hotel properties.

Count III — Vicarious Liability for TVPRA Violations
(Against Parent Hotel Defendants)

199. Plaintiff realleges and incorporates by reference the allegations in the above paragraphs as though fully set forth herein.

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200. Under the TVPRA and the federal common law, each member of a joint venture is vicariously liable for the acts and omissions of all other members of that joint venture.

201. Under the TVPRA and the federal common law, an entity is vicariously liable for the acts and omissions of its alter-egos.

202. Hotel Location Defendants acted as the actual agents of Parent Hotel Defendants when operating their respective hotel properties and in committing the wrongful acts and inactions alleged herein.

203. Through the wrongful acts and omissions described throughout this Complaint, Parent Hotel Defendants exercised or retained the right to exercise systematic and day-to-day control over the means and methods used by their franchisees to operate their respective hotel property. With respect to the Motel 6 Troutdale Portland East, the G6 Defendants directly owned and operated the property, and the staff and employees of that property acted as the direct agents, servants, and employees of the G6 Defendants within the course and scope of their employment.

204. Parent Hotel Defendants are vicariously liable for the TVPRA violations of their franchisees, the Hotel Location Defendants, and the subagents of such.

205. Additionally, on information and belief, each of the Parent Hotel Defendants participated in a joint venture operating the subject Hotel Location Defendant locations. They had highly integrated operations at the hotels, shared revenue and profits generated from the hotels, and exercised mutual control over the venture at the hotels. They functioned as a single integrated entity and/or as alter-egos of one another and are therefore

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each directly and proximately liable for the harms and damages caused to Plaintiff as a result.

JOINT AND SEVERAL LIABILITY

206. "Joint and several liability 'applies when there has been a judgment against multiple defendants."[16] If two or more defendants jointly cause harm, each defendant is held liable for the entire amount of the harm; provided, however, that the plaintiff recovers only once for the full amount.[17]

207. Federal law allows an injured party to sue a tortfeasor for the full amount of damages for an indivisible injury that the tortfeasor's negligence was a substantial factor in causing, without regard to his proportion of fault and even if the concurrent negligence of others contributed to the incident.[18]

208. Plaintiff alleges Defendants, and each of them, should be held jointly and severally liable to Plaintiff for the totality of his injuries and damages alleged herein

DAMAGES

209. Defendants' wrongful acts and omissions described above, individually and collectively, caused Plaintiff to sustain legal damages.

210. Plaintiff did suffer injuries as a direct and proximate result of Defendants', and each of their, wrongful actions and inactions alleged herein, including post-traumatic stress disorder, generalized anxiety, and depression; nightmares, panic attacks, and sleep

[16] *McDermott, Inc. v. AmClyde*, 511 U.S. 202, 220-21 (1994).
[17] *See* Restatement (Second) of Torts § 875 (1979); *Honeycutt v. United States*, 581 U.S. 443 (2017).
[18] *Edmonds v. Compagnie Generale Transatlantique*, 443 U.S. 256 (1979).

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disruption; impaired ability to trust others and to form and maintain relationships; ongoing substance-use struggles; difficulty obtaining and maintaining employment and completing his education; and a pervasive and continuing fear for his safety.

211. As such, Plaintiff is entitled to be compensated for past and future personal injuries, non-economic damages, and economic damages, see, e.g., 18 U.S.C. §§ 1593, 1595, including:

a. actual damages;

b. direct damages;

c. incidental and consequential damages;

d. lost earnings and lost earning capacity;

e. necessary medical expenses;

f. life care expenses;

g. physical pain and suffering;

h. physical impairment;

i. mental anguish and emotional distress damages (until trial and in the future);

j. restitution;

k. unjust enrichment; and

l. disgorgement of profits.

212. Plaintiff is entitled to pre- and post-judgment interest at the maximum legal rates.

PUNITIVE DAMAGES

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213. Plaintiff is entitled to punitive damages under the applicable statutes against Defendants, and each of them, for each and every cause of action alleged herein, as a result of Defendants' outrageous, wanton, willful, and malicious conduct underlying Plaintiff's claims.[19]

ATTORNEYS' FEES

214. Plaintiff is entitled to recover his costs and reasonable, necessary, or customary attorneys' fees from Defendants under the applicable statutes. See 18 U.S.C. § 1595(a).

215. All conditions precedent to Plaintiff's recovery of his costs and attorneys' fees have occurred or will occur prior to entry of judgment in this suit.

JURY DEMAND

216. Plaintiff requests a jury trial in this action.

PRAYER

217. For these reasons, Plaintiff prays that this case be set for trial before a jury, and that upon a final hearing of the cause, judgment be entered for Plaintiff against Defendants jointly and severally, for:

a. all economic damages to which he is entitled;

b. all actual damages to which he is entitled;

c. all incidental and consequential damages to which he is entitled;

d. all mental anguish and emotional distress damages to which he is entitled;

[19] *See Ditullio v. Boehm*, 662 F.3d 1091 (9th Cir. 2011).

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e. all restitution damages to which he is entitled;

f. all disgorgement of profits to which he is entitled;

g. all unjust enrichment damages to which he is entitled;

h. exemplary, treble, and/or punitive damages;

i. attorneys' fees and costs of suit;

j. pre-judgment and post-judgment interest at the highest rate allowed by law; and

k. all other relief to which he is entitled in law or in equity.

SINGLETON SCHREIBER, LLP

Dated: October 30, 2026

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