



United States
Joint Stakeholder Report for the United Nations Universal Periodic Review:
Labor Trafficking and Labor Exploitation

Submitted by

Submitted by The Advocates for Human Rights
a non-governmental organization in special consultative status with ECOSOC since 1996
and
Fé y Justicia

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The Advocates for Human Rights (The Advocates) is a volunteer-based non-governmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. Established in 1983, The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact finding, direct legal representation, education and training, and publications. The Advocates is the primary provider of free legal services to low-income asylum seekers in the Upper Midwest region of the United States, advocating for changes in United States immigration policy consistent with international human rights standards and obligations.

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Fé y Justicia is a Latinx-led non-profit organization. Our principles are based on Faith, and we strive to bring justice, kindness and compassion to our community throughout Central Minnesota. Our mission is providing training to our members so they become community leaders, in this way the necessary services for the community can be identified and leaders can organize their community to have long-term solutions. Our goal is that members/leaders/volunteers advocate for themselves and others with strength and dignity in the spaces where decisions are made. Contact person: Feyjusticiamn@gmail.com

EXECUTIVE SUMMARY

1. Since 2020, The United States has maintained its approach to combating labor trafficking and exploitation and, with one major exception, did not dramatically improve its response to violation of workers' rights. After President Trump's inauguration in 2025, the policy gains made since 2020 have functionally ceased to exist and other conditions that fuel trafficking and exploitation have worsened. Investigations and prosecutions of trafficking have also been impacted by policy changes in 2025.
2. Information in this report was drawn from The Advocates for Human Rights' client histories and interactions with government officials, as well as interviews with community organizers from Fé y Justicia.

I. IMPLEMENTATION OF INTERNATIONAL HUMAN RIGHTS OBLIGATIONS

Prohibition of slavery, trafficking¹

Status of Implementation: Accepted, Partially Implemented

The U.S. response to labor trafficking and exploitation remains imperfect, failing to protect some of the most vulnerable workers, and now threatens to become measurably worse.

3. From 2020-2024, the federal government predominantly continued its existing programs supporting the investigation and prosecution of traffickers and providing support primarily for foreign-born victims of trafficking. Ongoing federal grants to improve state-level responses to the human trafficking of youth made meaningful improvements in Minnesota, one of the recipients of those grants. The Trump Administration's targeting of noncitizens, directing of federal law enforcement resources to immigration enforcement rather than other case types, threats to state and local agencies, and rapid dismantling of federal programs have begun undermining the rights of trafficking victims, a process that will only accelerate as federal investigations cease and money for services is exhausted.
4. Federal investigations into human trafficking prioritized sex trafficking, with no federal prosecutions for labor trafficking in Minnesota during 2020-2025. However, over this same time period, the State of Minnesota received a federal grant that supported the development of a protocol for state and local law enforcement agencies to investigate labor trafficking. Bolstered by this protocol, state law enforcement agencies requested and received additional state funding for labor trafficking investigations,² and as a result, several cases were identified by Minnesota's Bureau of Criminal Apprehension (BCA) and still others were identified by NGOs or other state agencies and then taken up by the BCA for criminal investigation. Lessons learned from these initial investigations and prosecutions led the State of Minnesota to revise its labor trafficking statute to cover a comprehensive list of coercive behaviors and to provide clearer definitions for prosecutors to use.³

5. Despite these promising advances, many local law enforcement agencies in Minnesota are not trained to identify or investigate labor trafficking and frequently view it as outside their jurisdiction. The BCA offers training on the labor trafficking protocol and has consistent trouble attracting law enforcement agents to attend. This increases the burden on the BCA to take on all identified labor trafficking cases. The lack of training and awareness also increases the risk that labor trafficking victims may call their local law enforcement agency and, instead of being recognized as a crime victim, may be viewed as an undocumented immigrant and turned over to immigration enforcement agencies.⁴
6. After President Trump took office, federal law enforcement agencies were directed to divert their personnel and resources into identifying, detaining, and deporting noncitizens.⁵ As a result, the trafficking investigations being conducted by federal agents in Minnesota were transferred to the BCA, which now has very little capacity to identify and respond to new labor trafficking cases. Policy and legislative attempts to force state and local governments to prioritize immigration enforcement further impacted the local response.
7. One strength of the federal response prior to 2025 was the response to noncitizen child trafficking managed by the Office of Trafficking in Persons (OTIP). If a person encountered a child under age 18 in the U.S. who had experienced sex or labor trafficking, whether in the U.S. or another country, they could apply for an eligibility letter, which provided access to case management and services under the Trafficking Victims Protection Act.⁶ The program was extremely user-friendly, with OTIP staff assisting people reporting child trafficking to complete the applications, as well as doing extensive outreach and training to ensure their services were known. Applying for the child eligibility letter did not have onerous evidentiary requirements, making it a low barrier for receiving essential services. In contrast to almost every other avenue of assisting children, contacting OTIP did not risk law enforcement or child protection involvement that could potentially harm the child or their family. The success of this program in providing stability and safety for children should have prompted an expansion to other populations, such as allowing adults to access services without requiring law enforcement involvement. Instead, under the Trump Administration, rhetoric and policies seeking access to any confidential information related to immigrants raise serious concerns that the names and contact information of trafficked children could be misused. The portal used to request a child eligibility letter now warns individuals that “the government may monitor, intercept, and search and seize any communication or data transiting or stored on this system.”⁷ No further information is available, as many of the pages that describe the OTIP child eligibility process are no longer online.⁸
8. The federal response for noncitizen adult victims was more mixed during 2020-2024. Access to the same benefits that children receive through OTIP eligibility letters requires an adult to secure one of two statuses: Continued Presence (CP) or a T visa. CP must be requested by a law enforcement agency after they identify a victim of a “severe form of trafficking” who may be a potential witness in a trafficking case, allowing that victim to stay in the U.S. and work during the investigation and prosecution of the case. If Homeland Security Investigations (HSI) supports the request, the Center for Countering Human

Trafficking reviews the request and decides whether they will grant the status. After receiving CP, the victim also receives an HHS certification letter, which provides access to benefits similar to the OTIP eligibility letter for children, as well as a work permit for the duration of CP.⁹

9. The federal Government under President Biden issued repeated guidance to law enforcement agencies to seek CP, to Homeland Security Investigations (HSI) to make the formal request for CP, and to the Department of Homeland Security to grant these requests.¹⁰ Despite this guidance, clients of The Advocates for Human Rights routinely were unable to obtain CP, often for cases where the clients later received T visas, demonstrating that there was ample evidence meriting CP.
10. In the absence of receiving Continued Presence, adult victims seeking services can only apply for a T nonimmigrant status (T visa). Completing a T visa application is a lengthier process than receiving CP and can be especially difficult when victims do not have access to support such as stable housing, counseling, medical care, and other needs that would otherwise be provided with a certification letter. The timeline for most of the period to receive T nonimmigrant status protections was nearly 2 years, during which time victims faced numerous challenges. Victims are also not provided free legal services by the government, making access to legal processes nearly impossible without organizations providing free legal services.
11. In a positive development, the federal government codified new regulations on T visas that created the bona fide determination process, allowing access to work permits. The bona fide determination process is an initial step in which US Customs and Immigration Services (USCIS) determines that the T visa application is complete, was made in good faith, and that background checks have shown that the applicant does not pose public safety or national security concerns. In 2024, the U.S. made an important policy change to allow individuals with Bona Fide Determinations to apply for work authorization and obtain protection against deportation.¹¹ Due to the timing of the change, The Advocates does not have sufficient data to determine whether this process was followed; however, we were aware of ongoing issues with access and a number of improper denials.
12. The federal government under President Biden and continuing under Trump has failed at effectively protecting labor trafficking victims from deportation. The same difficult process that allows trafficking victims to secure benefits also provides protection from deportation, so the difficulties and delays victims face in receiving CP or T visas also makes them vulnerable to deportation. Additionally, the federal government does not adequately institute training and policies to identify trafficking victims even when agencies or officers are likely to encounter them. Immigration judges presiding over deportation cases do not consistently recognize red flags and do not respond well when they do identify red flags, often placing victims in greater danger by exposing the issue in public court. Immigration enforcement officers in both ICE and CBP are not required to screen for trafficking victimization, even when encountering people in situations with red flags (i.e. being called to detain an employee by an employer – a common threat used by traffickers).

13. Even in situations where policy requires screening for human trafficking, as with unaccompanied minors, federal agents routinely failed to identify cases later identified by The Advocates for Human Rights. Trafficking victims who entered the U.S. on legal visas reported that they were not screened or provided information about trafficking during visa interviews. H visas and J visas, which allow noncitizens to enter for temporary or seasonal employment, do not always require visa interviews even though the visa type has been linked to multiple human trafficking cases¹². Many farmworkers reported that they received no contact with a consular officer, which might have prevented their trafficking and identified traffickers for prosecution. Not only does the government fail to screen workers or inform them of their rights, they have also undertaken insufficient investigations and monitoring of employers at all stages of the process—from application by prospective sponsors to follow-up with offending employers. The employer-vetting process prior to migrant workers’ arrival is not robust enough to guarantee workers’ housing meets basic human rights standards or that employers have sufficient facilities to provide protections, such as adequate food, water and safety equipment, for applicants. The government also fails to monitor or conduct drop-in reviews of agricultural locations after workers arrive. The Advocates have only had one in more than 100 cases in which government agencies visited a farm for compliance checks or to provide Know Your Rights information to known visa-holders.¹³
14. Compounding the lack of screening, increased immigration enforcement without guardrails and the current rhetoric from the Trump Administration threatening increasingly punitive responses to immigration violations both dramatically increase trafficking risk and under-identification. One community organizer described the impact on her community: “People are afraid of living their lives like they used to even if ICE rumors are not true, they still have a fearful impact on the community.”¹⁴ Another organizer described several arrests, explaining that “this has a profound impact on the children in the family and the community, and that even her own daughter is scared. She said that she feels a regression in the work that has been done in recent years, and many immigrants are scared that their families will be split.”¹⁵
15. At the state level, the federal government provided grants that funded a small network of labor trafficking service providers in Minnesota. The success of that network led to advocacy at the state legislature, which now provides permanent funding to those providers,¹⁶ an important support as federal funding has disappeared. However, the funding is insufficient to meet the most pressing need of most victims – housing – and it is not well coordinated with the long-established network of NGOs that support sex trafficking victims. Law enforcement agencies report frustration when trying to place labor trafficking victims in safe shelter, which remains extremely limited, especially for adult men.

Right to just and favourable conditions of work

Status of Implementation: Accepted, Partially Implemented

Noncitizens, both those with legal status and those without, experience high levels of workplace abuse, and the disappearance of a key federal protection will undermine investigations into these crimes.

16. Community organizers reported severe exploitation of noncitizen farm workers: “Workers often suffer 12-hour shifts, lack of access to medical care, not being allowed to leave the farms, improper breaks, lack of pay, and if a worker reports an injury they might disappear or be fired.”¹⁷ In another case, the employer denied workers legally required breaks, stating, “cows do not have breaks and cows do not have holidays, so they should continue to work.”¹⁸ More marginalized noncitizens face even higher levels of abuse: “A lot of indigenous people do not speak Spanish, so they are often paid the lowest, suffer abuse on the farms, work longer hours, get paid lower wages, and employers steal their wages.”¹⁹
17. During the preceding five years, Minnesota did have success addressing some of these issues through a combination of worker-led education and outreach, coupled with strengthened laws, an active, well-resourced state agency, and a federal protection for noncitizen workers experiencing labor exploitation. In 2019, the Minnesota Legislature passed a wage theft law that was one of the strongest in the country, classifying failure to pay any wages promised or owed with an intent to defraud, as a type of theft, a criminal felony offense if the amount withheld was over \$1000.²⁰ Prior to this, wage theft was typically a civil administrative matter that triggered fines and damages, but no criminal liability for the employer. The law not only strengthened the penalties for wage theft, it also gave the Attorney General’s Office (AGO) new jurisdiction to pursue civil wage theft cases, which had previously only been investigated by the Department of Labor and Industry as administrative cases and not civil suits. As a result of this law, the AGO established a dedicated wage theft unit to identify, investigate, and enforce wage theft cases, which in 2023-2024, successfully filed 7 workers’ rights cases, recovering over \$1 million in back wages.²¹ In 2024, it also brought the first case of felony wage theft.²²
18. Worker-led community education and outreach was a key contributor to the successful d. Community organizers working with noncitizens “have seen a positive impact through education of people and the community on their rights. People are beginning to advocate for themselves.”²³ Another organizer reported:
19. Through the public speaking up, workers are starting to see a difference in their shifts, counting hours, limiting work to 40 hours, saying no when they cannot work and if not convenient for themselves not doing additional work.²⁴
20. These successes in turn lead to more interest in understanding workers’ rights: “She has found that a lot of their meetings have 50, to hundreds, to thousands of people with new faces coming in every week.”²⁵ Certain jurisdictions in Minnesota provide labor enforcement funding directly to worker centers and organizers to conduct co-enforcement,

with the worker centers providing education and identifying cases to bring to the government enforcement agency.

21. A final key contribution to the AGO's successful workers' rights cases was a federal immigration program called Deferred Action for Labor Enforcement (DALE). Deferred Action is a discretionary immigration protection for noncitizens that allows them to apply for a work permit and provides temporary lawful presence in the U.S. Under DALE, U.S. Citizenship and Immigration Services created a streamlined process to grant Deferred Action to noncitizens who are working or worked for an employer being investigated for labor violations. A government labor or employment agency submits a Statement of Interest identifying a worksite or group of workers who may be helpful to an investigation or enforcement action. Any worker who fits the description in the Statement of Interest can then individually apply for Deferred Action.²⁶ Fear of immigration enforcement is a strong deterrent to noncitizens reporting crimes or rights violations. The Advocates serves many clients who would not have reported labor or employment violations without the protection provided by the DALE program. Though the DALE program was designed for cases involving labor and employment violations, it was also a key tool in anti-trafficking efforts. In several cases, The Advocates had to interview clients multiple times before they felt comfortable sharing facts that indicated the individuals were victims of labor trafficking as well as labor violations. Without the safety and ability to work granted by DALE, those clients would not have been willing to commit to such a lengthy legal process, and the trafficking would have remained undetected. The DALE program has not been officially terminated, though the Trump Administration has revoked Executive Orders that were the basis for the policy, but does not seem to be operational at this time. The anti-immigrant rhetoric of the new administration, moreover, has led many to be too fearful to access this benefit.
22. Even with DALE, noncitizens experiencing labor exploitation face significant barriers in coming forward. DALE differs from the protections available to trafficking victims in several key ways: it does not provide any access to financial assistance or public benefits, and does not provide a long-term path to permanence or family reunification. In one case, The Advocates received a referral from a community partner that a farm was trafficking workers. The Advocates helped the workers report to the U.S. Department of Labor (DOL), which took on the case but did not provide CP; instead DOL only provided a letter to support requests for deferred action. Since Deferred Action does not come with public benefits, many of the individuals had challenges with housing when they considered leaving the farm. The Advocates had worked to connect them with attorneys and outline legal options for remaining in the U.S., getting work authorization while waiting, and connecting with social services for very basic needs such as a small stipend each month. Yet, without access to public benefits and work permits, the workers could not secure housing, which resulted in nearly half of the group deciding to leave the country for fear that they would be homeless. As a result, law enforcement lost numerous witnesses and many victims lost access to supports, benefits, justice systems, restitution, and immigration status they would be entitled to but for which they did not feel they could wait without

basic needs being met. If instead, DALE had provided access to financial and other support, the case could have proceeded.

Children: protection against exploitation

Status of Implementation: Accepted, Partially Implemented

Noncitizen children, especially unaccompanied minors, face a heightened risk of labor trafficking and exploitation. Though they receive some additional protections and benefits, those are being eroded under the Trump Administration.

23. The Advocates provides legal representation to unaccompanied minors who have entered the U.S. without lawful status and without an accompanying parent or guardian. The federal government processes unaccompanied minors through a special program, reflecting the unique needs of children, which places them with sponsors who can provide the children with family-like homes.
24. Children, and unaccompanied minors (UACs) in particular, are particularly vulnerable to trafficking and forced labor. Many UACs are placed in foster homes or short-term care in remote or rural areas, often with sponsors that may not have a strong connection to the child or comply with legal protections for the child. The federal government provides no assistance to sponsors to support the child, creating a financial burden that often leads to expectations the child will work to contribute to the family. Children who do not process through the UAC process often come to the US on advice and promises of extended family or individuals on social media. UACs often are prevented from attending school by sponsors or guardians. The Advocates has had two cases in the last two years alone in which children reported being prevented from attending school by sponsors who instead required them to work. The United States' failure to adequately monitor and follow-up with UACs, as well as lack of special provisions for support, contribute to these concerns. Distant relatives brought one of The Advocates' minor clients to the U.S., promising that the child could attend school and make lots of money. Upon arrival, however, the family member refused to let the child attend school and forced him to work at a nearby farm. The family member took the child's paycheck and told the child he was unable to get a bank account without status in the U.S. The child never received his wages and eventually escaped due to severe physical and emotional harm.²⁷
25. Children may also face exploitation by someone other than their sponsor. The Advocates has received numerous reports of UACs who are working dangerous jobs in meatpacking plants in rural areas—an issue that increased during the COVID-19 pandemic. Despite the U.S. government announcing shortly thereafter that it would institute new measures aimed at targeting child labor exploitation, The Advocates found that children were too fearful to come forward—fears that were exacerbated by growing anti-immigrant sentiment. When labor enforcement agencies issued orders to the businesses to stop illegally employing child labor, the children vanished rather than seek assistance.²⁸

II. RECOMMENDATIONS

26. This stakeholder report suggests the following recommendations for the Government of the United States of America to direct, incentivize, and financially support:

- Reprioritize the use of federal law enforcement resources to address human trafficking and not undocumented immigration; cease efforts to force state and local law enforcement to similarly divert resources.
- Restore the confidential process through the Office of Trafficking in Persons for providing benefits to child victims of labor trafficking.
- Create a process for adult victims of trafficking to obtain work permits and interim protections without requiring law enforcement certification of trafficking, modeled after the child eligibility letter process.
- Provide guidance directing HSI to quickly provide Continued Presence in cases where human trafficking red flags are identified, whether identified by law enforcement or civil society, and even if trafficking not confirmed but likely.
- Expand requirements for federal agencies that routinely encounter migrants, including the Departments of Homeland Security, Labor, and State and the Executive Office for Immigration Review, to screen both adults and children for human trafficking in ways that maximize victim safety, including by providing referrals to immigration attorneys.
- Fund specialized housing, case coordination, and victim advocacy services specifically for victims of labor trafficking.
- Increase penalties for wage and hour, occupational safety, labor organizing and other workers' rights violations to a level that provides a measurable deterrent effect, including criminal penalties and pair such efforts with adequate protections for victims who lose work or housing as a result of such investigations.
- Fund worker justice centers to provide worker-driven enforcement and education.
- Codify the Deferred Action for Labor Enforcement program in law, create a pathway to permanence and family reunification for DALE recipients, and raise awareness of its protections in communities at risk of labor and employment violations.
- Provide access to benefits and supportive services to migrants who qualify for DALE or other deferred action, allowing them to secure stable housing and income, facilitating investigation into their case.
- Improve pathways for employment-based migration and ensure such pathways are processed through systems with adequate employer screening and Know Your Rights information to applicants.
- The Department of Labor (DOL) should rigorously hold employers and traffickers accountable for compliance with child labor standards. This includes increasing civil monetary fines for companies that violate these standards and ensuring referrals for criminal prosecution where appropriate.

- Provide liquidated damages to children who are employed in hazardous occupations equal to their regular rate of pay for all hours worked, both to deter offenders and to encourage children to come forward when they experience child labor.
- Ensure that all unaccompanied children released from custody have access to attorneys as a means of prevention of exploitation and as a trusted, trauma-informed advocate. This can be achieved by robustly allocating funding provided by Congress under the Trafficking Victims Protection Reauthorization Act (TVPRA) to support legal representation.
- Fully implement and build upon the protections codified in the TVPRA, which includes screening for trafficking, safe placement in the custody of the Office of Refugee Resettlement (ORR), ensuring attorneys for these children to the greatest extent practicable, protecting victims of all ages from deportation and ongoing abuse, timely processing applications for immigration protections, adequately staffing and funding law enforcement that is specifically charged with labor and trafficking investigations.
- Increase funding for community-based organizations that provide social services, language support, and economic security to unaccompanied minors as they transition into new communities.
- Provide youth with Employment Authorization Documents to enable them to access regulated and safe work environments, reducing their vulnerability to exploitation.

¹ Human Rights Council, *Report of the Working Group on the Universal Periodic Review: United States of America* (15 Dec. 2020), U.N. Doc. A/HRC/46/15, ¶26.257 Take effective measures to prevent trafficking in persons and to address the issues of overcrowding in prisons, police violence and the increase in manifestations of racism, extremism and xenophobia (Russian Federation); ¶26.279 Continue to improve efforts to reduce and eliminate adult and child trafficking (Republic of Moldova); ¶26.280 Strengthen its bilateral collaboration to abolish human trafficking and slavery in the fisheries industries (Indonesia); ¶26.281 Continue efforts in combating human trafficking and ensure the protection of the rights of victims of trafficking, as well as the rights of migrants (Nigeria); ¶26.282 Strengthen sanctions against employers who engage in unfair labour practices and ensure that workers' rights are not violated (Myanmar).

² MN Bureau of Criminal Apprehension, *Changes to labor trafficking law help BCA protect Minnesotans*, <https://dps.mn.gov/news/changes-labor-trafficking-law-help-bca-protect-minnesotans>, accessed 7 April 2025.

³ The Advocates for Human Rights, *The Advocates Supports Legislation to Strengthen Accountability for Labor Trafficking in Minnesota*, 8 March 2022, <https://www.theadvocatesforhumanrights.org/News/A/Index?id=275>, accessed 7 April 2025.

⁴ Information on file with the report authors 2020-2025.

⁵ Kate Plummer, "Diplomatic Security Staff to Help Arrest Illegal Migrants," *Newsweek*, 21 Feb 2025, <https://www.newsweek.com/dhs-homeland-security-illegal-migrants-donald-trump-2034303>, accessed 7 April 2025.

⁶ Office on Trafficking in Persons, *Responding To Foreign National Minors Who Have Experienced Human Trafficking*, 2023, <https://niwaplibrary.wcl.american.edu/wp-content/uploads/NJN-PowerPoint-Presentation-05.02.23.pdf>, accessed 7 April 2025.

⁷ Office on Trafficking in Persons, *Shepherd Case Management System*, <https://acf.gov/otip/services/requests-assistance/shepherd>, accessed 7 April 2025.

⁸ See example at <https://acf.gov/otip/victim-assistance/child-eligibility-letters>.

⁹ Center for Countering Human Trafficking, *Continued Presence: Temporary Immigration Designation for Victims of Human Trafficking*, <https://www.ice.gov/doclib/human-trafficking/pdf/continued-presence.pdf>, accessed 7 April 2025.

¹⁰ Center for Countering Human Trafficking, *Continued Presence Resource Guide*, September 2023, <https://www.ice.gov/doclib/human-trafficking/ccht/continuedPresenceToolkit.pdf>, accessed 7 April 2025.

¹¹ American Immigration Lawyers Association, *USCIS Final Rule on T Visa Classifications and Eligibility*, 30 April 2024, <https://www.aila.org/library/uscis-final-rule-on-t-visa-classifications-and-eligibility>, accessed 7 April 2025.

¹² Confidential source, 27 Jan 2022, on file with The Advocates for Human Rights.

¹³ Confidential source, 27 Jan 2022, on file with The Advocates for Human Rights.

¹⁴ Community interview, 3/11/25

¹⁵ Community interview, 3/11/25.

¹⁶ MN Department of Health, *Report on Labor Trafficking Services Grant Program*, 15 Jan 2024, <https://www.health.state.mn.us/communities/humantrafficking/documents/2024laborlegprpt.pdf>, accessed 7 April 2025.

¹⁷ Community interview, 3/11/25.

¹⁸ Community interview, 3/11/25.

¹⁹ Community interview, 3/11/25.

²⁰ The Advocates for Human Rights, *Holding Abusive Employers Accountable*, 28 June 2019, <https://www.theadvocatesforhumanrights.org/News/A/Index?id=30>, accessed 7 April 2025.

²¹ MN Attorney General Keith Ellison, Working for Workers, September 2024, https://www.ag.state.mn.us/Office/Reports/LaborReport_2024.pdf, accessed 7 April 2025.

²² Matt Sepic, “Alleged mistreatment of migrant workers net felony charges for Minnesota farmer,” *MPR News*, 4 Feb 2025, <https://www.mprnews.org/story/2025/02/04/alleged-mistreatment-of-migrant-workers-nets-felony-charges-for-minnesota-farmer>, accessed 7 April 2025.

²³ Community interview, 3/11/25.

²⁴ Community interview, 3/11/25.

²⁵ Community interview, 3/11/25.

²⁶ US Citizenship and Immigration Services, *DHS Support of the Enforcement of Labor and Employment Laws*, 24 Jan 2025, <https://www.uscis.gov/working-in-the-united-states/information-for-employers-and-employees/dhs-support-of-the-enforcement-of-labor-and-employment-laws>, accessed 7 April 2025.

²⁷ The Advocates for Human Rights, *The United States of America’s Compliance with the International Covenant on Civil and Political Rights: Nondiscrimination, Human Trafficking and Forced Labor, Non-Refoulement and Immigration Enforcement and Detention*, 12 Sept 2023,

<https://www.theadvocatesforhumanrights.org/Res/AHR%20Migrants%20Trafficking%20ICCPR%202023%202.pdf>, accessed 7 April 2025.

²⁸ The Advocates for Human Rights, *The United States of America’s Compliance with the International Covenant on Civil and Political Rights: Nondiscrimination, Human Trafficking and Forced Labor, Non-Refoulement and Immigration Enforcement and Detention*, 12 Sept 2023,

<https://www.theadvocatesforhumanrights.org/Res/AHR%20Migrants%20Trafficking%20ICCPR%202023%202.pdf>, accessed 7 April 2025.