

2023

**TRIAL COURT
CASE MATERIALS**

STATE OF MINNESOTA V. AUBREY

Human Trafficking

BACKGROUND INFORMATION

In August 2022, former security guard Cameron Aubrey decided to open a restaurant in Cameron's hometown of New Prague, Minnesota. Cameron planned on serving the cuisine of Costa Rica, a country with a struggling economy. Costa Rica's schools teach English as a mandatory second language. Cameron was new to the food service industry and hired Julian Blake, a friend who had worked as a restaurant consultant, to assist with the process.

In early September, after researching many locations, Cameron and Julian settled on a two-story building located near downtown New Prague. The building had previously been a diner. The main dining area had seven tables and a counter that looked into the kitchen through an open service window. On the ground floor of the building there was an office, pantry, and freezer, as well as restrooms for customers and employees. A door led to a parking lot adjacent to the back of the building. Another door located in the area behind the kitchen led to a stairwell to the second floor. The door at the bottom of this stairwell contained a self-locking double-cylinder deadbolt that required a key on either side to open. The door at the top of the stairwell had no lock at all and led into a small studio apartment.

Julian worked on remodeling the building, and Cameron looked for someone to cook authentic Costa Rican cuisine. Cameron's cousin, Devin Tyler, suggested that Cameron place an advertisement in the newspapers that circulated in Little Costa Rica, a small Costa Rican community two hours' drive from New Prague. In October, Devin helped Cameron place the advertisement, which read:

Restaurant owner seeking to hire cook for full-time position. Housing provided. Must cook Costa Rican cuisine. Must speak English. Must be willing and able to work hard in a fast-paced environment.

Lin Stark saw the advertisement. Although Lin had no professional training as a cook, Lin was born and raised in Costa Rica and had learned to cook Costa Rican cuisine at home. Lin responded to the advertisement. Lin had been struggling to find work in Costa Rica. Without a job, Lin was unable to support Lin's family. In need of money, Lin came to the United States in June 2022 on a TBD-2 temporary work visa for non-agricultural workers, sponsored by a hotel chain for whom Lin worked in housekeeping.

After an interview and a cooking simulation, Cameron offered Lin the position. Cameron informed Lin that the restaurant would be open six days a week. Cameron told Lin that Cameron had furnished the studio apartment on the second floor where Lin would live. When Lin asked Cameron to discuss Lin's pay, Cameron told Lin that Cameron was not yet sure what Cameron could afford to pay. Lin then accepted the position. On November 2, 2022, Lin moved into the apartment and started work at the restaurant in preparation for opening on December 1. Cameron gave Lin employment paperwork to complete. Cameron also asked Lin for Lin's visa and passport, which Lin provided. Cameron told Lin it was necessary to complete additional paperwork. At the end of November, Cameron paid Lin \$500 in cash for that first month's work.

Taste of Costa Rica opened on December 1, 2022. The restaurant was open Monday through Saturday for lunch and dinner. Lin worked long hours with no

breaks, and on Lin's day off, Lin would work additional hours. The restaurant had several other employees, all part-time, working both in the kitchen and dining area. At the end of December, Cameron paid Lin \$400 in cash for the second month's work.

During Lin's employment, Julian observed many interactions between Cameron and Lin. Julian had a disagreement with Cameron in late December over how the restaurant was being managed. Julian resigned.

In early March 2022, Lin received news that Lin's sister was gravely ill. On March 9, 2022, after the restaurant closed for the night, Lin approached Cameron about taking time off. Lin and Cameron argued about Lin's request. At the end of the argument, Lin walked through the stairwell door. Cameron closed it behind Lin. Cameron left shortly after the argument without unlocking the door. The next morning, Lin went downstairs and attempted to open the door but found that it was locked. Lin intermittently banged on the door until Cameron opened it. Since the restaurant opened in December, a uniformed police officer named Hayden West, would occasionally come in to eat lunch. On March 7, 2022,

Officer West was eating lunch at Taste of Costa Rica when Officer West saw Cameron yelling at Lin in the kitchen.

On March 10, Officer West had lunch again at Taste of Costa Rica. Officer West sat at the counter, in Lin's line of sight. Lin brought Officer West's food to the counter where Officer West was sitting. With the food Lin delivered a note that read, "PLEASE HELP ME. I'M TREATED LIKE A SLAVE." Cameron came over to the counter and told Lin to go back to work.

After this interaction, Officer West obtained a search warrant and conducted a lawful search of the restaurant, Lin's apartment, and Cameron's residence. After the investigation, Officer West arrested Cameron on a charge of human trafficking and a charge of false imprisonment for the incident on the evening of March 9 and the morning of March 10.

Note: The background information is a review aid. It is not evidence and may not be referred to during your trial.

CHARGES

Count One

MINN. STAT. 1243 Human Trafficking

The defendant is charged with human trafficking, a felony, which is the deprivation or violation of the personal liberty of another with the intent to obtain forced labor or services.

Count Two

MINN. STAT. 1242 False Imprisonment

The defendant is charged with false imprisonment, a misdemeanor, which is the unlawful violation of the personal liberty of another.

Jury Instructions regarding the Charge

Human Trafficking

The defendant is charged in Count One with human trafficking in violation of Penal Code section 236.1(a), a felony.

To prove that the defendant is guilty of this crime, the People must prove that:

1. The defendant either deprived another person of personal liberty or violated that other person's personal liberty;

AND

2. When the defendant acted, he or she intended to obtain forced labor or services.

Depriving or violating another person's personal liberty, as used here, includes substantial and sustained restriction of another person's liberty accomplished through fear, fraud, deceit, coercion, or duress to the victim or to another person under circumstances in which the person receiving or perceiving the threat reasonably believes that it is likely that the person making the threat would carry it out.

Forced labor or services, as used here, means labor or services that are performed or provided by a person and are obtained or maintained through force, fraud, duress, or coercion, or equivalent conduct that would reasonably overbear the will of the person.

Duress means a direct or implied threat of force, violence, danger, hardship, or retribution that is enough to cause a reasonable person to do something that he or she would not otherwise do.

Duress includes a direct or implied threat to destroy, conceal, remove, confiscate, or possess any actual or purported passport or immigration document of the other person or knowingly destroying, concealing, removing, confiscating, or possessing any actual or purported passport or immigration document of the other person.

Coercion includes any scheme, plan, or pattern intended to cause a person to believe that failing to perform an act would result in the abuse or threatened abuse of the legal process or debt bondage.

When you decide whether the defendant deprived another person of personal liberty or violated that other person's personal liberty, consider all of the circumstances, including the age of the other person, his or her relationship to the defendant, and the other person's handicap or disability, if any.

False Imprisonment

The defendant is charged in Count Two with false imprisonment in violation of Penal Code section 236, a misdemeanor.

To prove that the defendant is guilty of this crime, the People must prove that:

1. The defendant intentionally and unlawfully restrained, detained, or confined a person;

AND

2. The defendant's act made that person stay or go somewhere against that person's will.

An act is done *against a person's will* if that person does not consent to the act. In order to *consent*, a person must act freely and voluntarily and know the nature of the act.

False imprisonment does not require that the person restrained or detained be confined in jail or prison.

STIPULATIONS

Both sides stipulate to (and agree and admit) the following as fact:

1. Officer West search warrant was properly obtained.
2. On March 10, there was sufficient probable cause to arrest Cameron Aubrey.
3. All physical evidence and witnesses found in this case, but not made physically available for trial, are unavailable and their availability may not be questioned.
4. Exhibit A is a correct and accurate depiction of the floor plan of Taste of Costa Rica that was created by the New Prague Police Department. Exhibit B is the note written by Lin Stark and given to Officer West on March 10.
5. Beyond what's stated in the fact situation and witness statements, no other evidence was found in this case.
6. All witness statements were taken in a timely manner.
7. Dana Grey and Addison Frey are qualified expert witnesses and can testify to each other's statements and relevant information they would have reasonable knowledge of from the fact situation, witness statements and stipulations.
8. TBD-2 is a valid visa and its validity may not be questioned.
9. Lin was a salaried employee (not hourly), who received compensation between \$800-\$900 a month which includes room, board, utilities, and cash payment. Minimum wage during Lin's employment was \$9.00 hour.
10. All exterior doors in the restaurant can be locked and unlocked from inside the building without the need of a key. Lin did not have a key to the exterior doors of the restaurant.

JURY INSTRUCTIONS

MINN. STAT. 223 (Direct and Circumstantial Evidence)

Facts may be proved by direct or circumstantial evidence or by a combination of both. Direct evidence can prove a fact by itself. For example, if a witness testifies he saw it raining outside before he came into the courthouse, that testimony is direct evidence that it was raining.

Circumstantial evidence also may be called indirect evidence.

Circumstantial evidence does not directly prove the fact to be decided, but is evidence of another fact or group of facts from which you may logically and reasonably conclude the truth of the fact in question. For example, if a witness testifies that he saw someone come inside wearing a raincoat covered with drops of water, that testimony is circumstantial evidence because it may support a conclusion that it was raining outside.

Both direct and circumstantial evidence are acceptable types of evidence to prove or disprove the elements of a charge, including intent and mental state and acts necessary to a conviction, and neither is necessarily more reliable than the other. Neither is entitled to any greater weight than the other. You must decide whether a fact in issue has been proved based on all the evidence.

MINN. STAT. 224 (Circumstantial Evidence: Sufficiency of Evidence) Before you may rely on circumstantial evidence to conclude that a fact necessary to find the defendant guilty has been proved, you must be convinced that the People have proved each fact essential to that conclusion beyond a reasonable doubt.

Also, before you may rely on circumstantial evidence to find the defendant guilty, you must be convinced that the only reasonable conclusion supported by the circumstantial evidence is that the defendant is guilty. If you can draw two or more reasonable conclusions from the circumstantial evidence and one of those reasonable conclusions points to innocence and another to guilt, you must accept the one that points to innocence.

However, when considering circumstantial evidence, you must accept only reasonable conclusions and reject any that are unreasonable.

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**WITNESS STATEMENT
PROSECUTION WITNESS**

**Lin Stark
Victim**

1 My name is Lin Stark. I am 25 years old. I am an immigrant from Costa Rica. I
2 had to drop out of college where I was studying accounting in order to support
3 my aging mom, sick sister, and young niece. The economy is so bad in Costa
4 Rica, I knew there were no real job opportunities for me there, so in June 2022, I
5 came to the United States. I worked on a TBD-2 temporary work visa as a
6 housekeeper in a hotel near Little Costa Rica. The visa came with several other
7 documents, but I did not read them because I was just happy to have the visa. My
8 goal was to make enough money to support my family and maybe one day bring
9 them to the United States.

10 Sadly, the hotel became overstaffed, and in October I was laid off. Luckily, I saw
11 an advertisement for a full-time position as a cook at a new Costa Rican
12 restaurant. I do not have professional training as a chef, but I learned to cook
13 from my mother while growing up. So I decided to apply in order to stay in the
14 United States because going back to Costa Rica was not an option.

15 I received a call from the restaurant owner, Cameron Aubrey. We arranged an
16 interview and a cooking simulation at the restaurant. During the interview, I
17 answered many questions about my background and reasons for coming to the
18 U.S. Cameron also asked me personal questions about my family and my
19 finances. I told Cameron about my family's poverty and my desperate financial
20 situation caring for them. I said I would do almost anything to stay in the United
21 States. Cameron also asked me, "Would anyone in Little Costa Rica miss you if
22 you were gone?" I responded, "Not really, I don't have family or close friends
23 here."

24 Cameron offered me the job and told me that I had to live in an apartment on the
25 property rent-free. I could make and eat all my meals at the restaurant for free.
26 Cameron even told me that Cameron would help bring my family to the U.S. I
27 immediately accepted.

28 On November 2, I started my new job. Cameron asked me to fill out paperwork
29 and took my visa and passport. Cameron told me Cameron needed the
30 documents to complete employment paperwork. I trusted Cameron with the
31 documents. I never got them back.

32 That same day, I moved into the studio apartment above the restaurant. It had
33 two windows with security bars on the outside. There was a fold-up single bed in
34 the corner, a small table with a table lamp and chair, a tiny bathroom with a
35 small shower, a dresser, and a closet. The bathroom door was missing. The
36 apartment smelled slightly of mildew and the walls had peeling paint. The carpet
37 was dirty. Cameron said it was my "new humble home." Cameron also showed
38 me a key attached to a red lanyard under the dresser to open the downstairs door.
39 Cameron said something about an "automatic lock," and the door had a sign on it
40 to always stay open. After I put my things away, I took the key and closed the
41 door at the bottom of the stairwell. I went to a nearby store to buy personal
42 supplies with fifty dollars that Cameron gave me. I didn't have much and I was

43 grateful that Cameron helped me out. When I returned, I used my key to unlock
44 the stairwell door. Cameron saw me and told me the door was to remain open
45 always. After that, I never closed the door and it was always open. I remember
46 putting the key back under the dresser, and I never used it again.

47 During November, Cameron put me to work getting the kitchen and menu ready.
48 Cameron had bought used kitchen equipment in decent shape. Initially, my
49 working conditions were bearable. I would come downstairs to work around 8:00
50 a.m. and go back upstairs around 7:00 p.m. Cameron would often work on the
51 menu with me. As a boss, Cameron seemed kind. I thought at first that Cameron
52 liked working with me. Cameron even let me use the phone on occasion in
53 Cameron's office to call my family back in Costa Rica.

54 On the day I started, I met Julian Blake and Devin Tyler. I learned that Devin
55 was Cameron's cousin who managed a hotel, and Julian was helping Cameron
56 remodel the restaurant. During my time at the restaurant, I would occasionally
57 see Devin. Julian was there more often, usually 4–5 times a week. I didn't speak
58 to either Julian or Devin very often because I knew they were busy.

59 My work conditions worsened once the restaurant opened. Lunch started at

60 11 a.m., Monday through Saturday; I had to start working at around 7:30

61 a.m. doing all the food preparation for lunch and dinner myself. We closed at
62 10:00 p.m. and I would do all of the clean-up by myself. I normally finished
63 around 11:30 p.m. or midnight. Sundays were also busy days. Although I was
64 supposed to be off, Cameron would make me do inventory and other tasks.

65 Cameron's attitude toward me also drastically changed. Cameron became harsh
66 and merciless, berating me for every mistake I made. Cameron would often
67 come into the kitchen during the lunch rush and yell at me to work faster. If I
68 took a break for even five minutes, Cameron would yell at me for being lazy and
69 threaten to fire me and then I would lose my visa. I am not lazy. I am a hard
70 worker. During my time at the restaurant, I rarely took breaks. I was working
71 roughly 90 hours per week from Monday to Saturday. I had assumed that
72 working "full time" meant 40 hours a week, but clearly I had been misled.

73 I needed to get away, even if it was only for a short time. So one day in mid-
74 December, I walked to a nearby vegetable wholesale market to buy fresh
75 vegetables for some new recipes I wanted to test. I returned five minutes later
76 than expected, and Cameron had a tantrum. Cameron said that other employees
77 would go buy vegetables from then on. Up until that point, at least I felt like I
78 could take a walk from time to time. But after that, Cameron would yell at me
79 whenever I stepped into the parking lot behind the restaurant to get some fresh
80 air. Cameron would say the kitchen "never closed during working hours." I even
81 had a fever once, but Cameron forced me to work anyway, which I thought was
82 unsanitary. Cameron overwhelmed me with so much work that it became almost
83 impossible for me to leave. After hours, I had not much time to even get a good
84 night's sleep, and there was nowhere for me to go in that isolated neighborhood,
85 anyway. I was basically trapped there. I felt like a slave.

86 Luckily I became friends with employee Frankie Lyman, a community college
87 student. I don't think Cameron liked my friendship with Frankie. Often when I
88 spoke to Frankie, Cameron would interrupt and tell us to get back to work.
89 Cameron told me I was to keep my "head down" and "cook the food." But I
90 liked how Frankie cared about my family and asked how they were doing.

91 Frankie even helped me send money to my family. At the end of each month
92 when I was paid, Frankie and I would walk to the store to wire \$350 to my
93 mother in Costa Rica using Frankie's ID. These were the few times after the
94 vegetable incident that I left the restaurant.

95 My pay was another issue. At the end of November, I received my first payment
96 of \$500 in cash. I did not have a bank account so I was okay with being paid in
97 cash. However, I don't think \$500 is a fair wage. I worked so many hours and I
98 think I deserved more money. But Cameron said that was all Cameron could
99 afford and promised to pay me more later. Overall, Cameron did pay me \$400
100 for December and another \$400 each for January and February. I thought that
101 was still low. When I asked Cameron about it at the end of December, Cameron
102 told me I had no choice in the matter. This was my pay "until further notice."
103 Cameron asked me if I preferred being back in Costa Rica with no job. I became
104 frightened, thinking Cameron might fire me, which would mean I would lose my
105 visa and be deported. So I accepted my pay as it was.

106 My living conditions were terrible. My bathroom had a leaking faucet and the
107 hot water was lukewarm at best. I told Cameron about the plumbing problems in
108 December, but Cameron never fixed them. I also washed all my clothes in my
109 bathroom sink. I offered to pay rent to solve this problem to which Cameron
110 laughed and said, "With what money?"

111 In January, I began to suffer mentally and physically. I had endless back, neck,
112 and foot pain from standing all day, which were magnified by my sleeping on a
113 folding bed. I also began to suffer from anxiety and depression. I was afraid to
114 ask for any time off. I knew I couldn't continue to live like this.

115 In early March, I remember talking to Frankie about how upset I was, that I
116 wasn't sure when my visa might expire and I might be forced to leave the United
117 States. I really needed Cameron to sponsor my visa so I could stay. Frankie
118 reassured me, but I still felt like Cameron was going to jeopardize my visa. It
119 was around this time that I also spoke with my mother on the phone, and she told
120 me my sister was dying. I wanted to go home to see my sister, even if only for a
121 couple of days.

122 On March 9, 2022, as we were closing up for the night, I told Cameron about my
123 sister's condition and asked to take a couple of days off to see her. I suggested
124 Cameron might finally hire an assistant cook who could sub for me while I was
125 gone. I also asked Cameron to give me my visa and passport so I could travel to
126 Costa Rica. Cameron became very angry and told me I was not allowed to leave
127 under any circumstances. In the heat of the moment, I furiously walked away
128 from Cameron to my apartment. After I walked through the stairwell door,
129 Cameron slammed it behind me. I heard Cameron say through the door, "You
130 better get comfortable here. It's going to be a while before you go anywhere!"

131 The next morning, on March 10, I came downstairs at 6:30 a.m. and found the
132 stairwell door was still closed and locked. When I realized there was no way out,
133 I went to look for the key under the dresser, but it was gone. I was shocked
134 because the key had been there yesterday morning. I saw it when I went to pick
135 up a pen that had rolled off the dresser. Cameron had trapped me inside my
136 apartment to punish me. Sobbing and desperate, I banged on the door and called
137 for help. Finally, around 7:00 a.m., Cameron came to open the door. Cameron
138 said, "Missing your key?" Then, Cameron laughed at me and walked away.

139 As the day went on, I felt emotionally overwhelmed. I could not believe
140 Cameron had locked me in my apartment overnight. At one point, Frankie told
141 me of seeing Cameron the previous day coming out of my apartment and that
142 Cameron had mentioned my leaking faucet. I thought that was odd because my
143 faucet was still leaky and I had told Cameron about the faucet way back in
144 December. I think Cameron took the key from under the dresser.

145 Around 12:30 p.m., I saw through the window Officer West sitting at the counter
146 in full uniform. Officer West would occasionally come to the restaurant during
147 lunch and we've had a few polite conversations. I remember sharing a little bit
148 about my family back home and how I was supporting them. I also told the
149 officer that I lived on the second floor of the restaurant. I was afraid to go to the
150 police before because I was desperate to keep my job, but I knew it was now or
151 never. I couldn't go on like this. As I was preparing Officer West's order, I
152 found a piece of paper and wrote a note that read, "PLEASE HELP ME. I'M
153 TREATED LIKE A SLAVE." I personally gave the note to Officer West with
154 West's lunch. Immediately, Cameron came over and told me, "Stop bothering
155 this person and go back to the kitchen."

156 Later in the day, Officer West returned to interview me and search both the
157 restaurant and my apartment. That same day, Cameron was arrested, and I was
158 finally free. I was taken to a shelter and the next day, March 11, a social worker
159 by the name of Dana Grey interviewed me. Dana asked me questions about my
160 working conditions and my relationship with Cameron.

161 A month later I also spoke with another social worker, Addison Frey.

WITNESS STATEMENT
PROSECUTION WITNESS
Julian Blake

1 My name is Julian Blake. I am 45 years old. I graduated from culinary school in St.
2 Paul, Minnesota. I have owned or co-owned several diners and small restaurants in
3 Arizona, Nevada, and Minnesota. I also work occasionally as a restaurant
4 development consultant. I have been an acquaintance of Cameron Aubrey since we
5 were in high school together.

6 In early August 2022, Cameron called me about an idea to open a Costa Rican
7 restaurant. Cameron had been working as a security guard but had inherited some
8 money and wanted to open a restaurant. Cameron did not have a background in the
9 restaurant business, so Cameron wanted to hire me as a consultant. I doubted
10 Cameron's inheritance would cover all the expenses of opening a restaurant,
11 especially paying for the necessary staff. Cameron was confident that Cameron could
12 find just the right type of hardworking employees. Cameron explained that in
13 Cameron's previous position as a guard at a garment factory, the boss there had a lot
14 of foreign workers. Cameron said, "He got a lot out of them for very little cost." I
15 thought nothing of that comment at the time, but later I realized it meant something
16 ominous. I agreed to help Cameron with the restaurant in exchange for reduced fees
17 and a five percent share in the profits.

18 At first, things were going great. We began by scouting locations and, in September
19 2022, we found an excellent property located in a business park near Downtown
20 New Prague.

21 I noticed the lock on the stairway door because double-cylinder deadbolts are known
22 to be major fire hazards. Anyone on the second floor without a key to the deadbolt
23 may become trapped behind this door. I told Cameron I thought we should remove
24 the deadbolt, but Cameron told me having a double-cylinder deadbolt on this door
25 could be very useful if Cameron ever wanted to "lock something away." I thought
26 this comment was strange. Nonetheless, Cameron posted a sign on the door that said,
27 "FIRE HAZARD – KEEP DOOR OPEN AT ALL TIMES."

28 We settled on a December grand opening. While I worked on remodeling the
29 restaurant, Cameron looked for employees. I offered to help Cameron look for a
30 chef, but Cameron refused. Cameron told me Cameron was looking for a very
31 particular kind of person. On November 2, Cameron introduced me to Lin Stark.
32 Cameron told me that Lin was from Costa Rica and that Lin was an excellent chef. I
33 asked Lin about Lin's culinary background, and Lin told me that Lin had no
34 restaurant experience. I was concerned that I had not been consulted about the chef,
35 who is the single most important employee in a restaurant. I just hoped that Lin's
36 cooking was good.

37 Later that day, I brought one of Lin's suitcases to the apartment. When I walked into
38 the apartment, I noticed it needed a cleaning and was pretty bare. There was a fold-
39 up cot and a small table with a chair in the corner and a small bathroom. I asked
40 Cameron if Cameron was going to give Lin more furniture or help clean the
41 apartment, but Cameron shrugged and said no. Cameron did not seem to care.

42 When Lin first started working, Lin and Cameron seemed to get along very well. Lin
43 spent most of Lin's time developing the menu and testing dishes. I tried Lin's
44 cooking and it was excellent. After the restaurant opened, I saw a drastic change in
45 Cameron's attitude and behavior. Cameron became extremely harsh toward Lin,
46 often yelling, even threatening to get Lin deported if Lin did not work faster. I never
47 saw Lin speak up. Lin seemed intimidated by Cameron.

48 Cameron expected Lin to work unreasonable hours without a proper
49 kitchen staff. After the restaurant had been open for one week, I
50 approached Cameron about hiring some additional staff to help Lin, but
51 Cameron refused. Cameron told me the restaurant's staff was Cameron's

52 "proprietary interest" and none of my concern. I was only at the restaurant at this
53 point for a few hours a day, about three days a week. In those small windows of
54 time, I saw Cameron speak harshly to Lin and ignore whatever Lin would say. I can
55 only imagine what happened when I was not there.

56 In late December, I also overheard Lin and Cameron having a conversation about
57 Lin's wages. Lin asked why Cameron had only paid Lin \$400 for an entire month's
58 work. Cameron angrily responded that was all Cameron had.

59 Lin walked away silently, looking at the floor.

60 I was concerned about Cameron's treatment of Lin, which I did not know resulted
61 from either a lack of restaurant experience or from a desire to exploit Lin. After
62 Cameron's conversation with Lin, I told Cameron about the normal hours, salaries,
63 and benefits of full-time chefs in small restaurants. I warned Cameron to be careful
64 about burning out Lin or, even worse, violating labor laws. Cameron yelled at me for
65 "overstepping my bounds as a consultant." I resigned immediately. I did not want to
66 associate myself with someone who treated employees like property.

67 On March 7, I stopped by the restaurant around lunch time to get the last of
68 my files from Cameron's office. As I was waiting to talk with Cameron, I saw
69 Cameron get in Lin's face and yell "What's wrong with you? Work faster!" Lin
70 looked at the floor and didn't respond. Lin looked broken down.

71 I left without getting my files. I felt like this was not a healthy place for Lin to be but
72 I didn't know what to do about it. On March 9, I decided to go to the police and tell
73 them everything I knew about the working conditions at Taste of Costa Rica. At the
74 station I spoke to Officer Hayden West, whom I had seen at the restaurant in
75 December. I described for West Cameron's treatment of Lin and asked if that was
76 potentially illegal. I also mentioned Cameron's strange comment about the "boss" at
77 the garment factory. Officer West thanked me for the information and told me to
78 keep in touch.

79 When I heard Cameron was arrested for human trafficking, I was sad but not
80 surprised. I only witnessed the first two months of Cameron's relationship with Lin. I
81 can imagine the other months were just as bad, if not worse.

WITNESS STATEMENT
PROSECUTION WITNESS
Officer Hayden West

1 My name is Hayden West. I am 28 years old and work as a police officer for the
2 New Prague Police Department. I have been employed with the New Prague
3 Police Department for seven years. On March 10, 2022, I arrested Cameron
4 Aubrey for human trafficking and false imprisonment, after conducting an
5 investigation which included a search of Aubrey's restaurant and residence, as
6 well as Lin Stark's residence.

7 As a police officer, I have attended a daylong training course on human
8 trafficking, which is a serious problem in Minnesota because of the state's high
9 immigrant population. In the course, I learned victims of human trafficking often
10 exhibit evidence of poor care, including signs of trauma and fatigue. I also
11 learned victims are often afraid to communicate with the outside world. They
12 generally live and work in one place and do not have freedom of movement.
13 Additionally, trafficking victims generally do not have control over their
14 immigration documents or government-issued identification. These are some of
15 the factors we were trained to identify as trafficking indicators.

16 I have been an occasional customer at Taste of Costa Rica since it opened in
17 December 2022. Over time, I became acquainted with Lin Stark. The restaurant
18 has a big counter where customers can sit and see into the kitchen. I usually sat
19 at the counter. Lin was the only cook I ever saw at the restaurant.

20 On a couple of occasions, Lin and I chatted while Lin cooked the food. Lin
21 always seemed hesitant. Still, I learned that Lin was an immigrant from Costa
22 Rica and was supporting family members back home. I also learned that Lin
23 lived on the second floor of the restaurant.

24 A few times, I did witness Cameron's interactions with Lin. Cameron would
25 often yell at Lin for the smallest things and would even threaten to dock Lin's
26 pay. Cameron would go into the kitchen to yell at Lin to work faster or harder,
27 even though Lin appeared very busy. I wondered why Lin stayed working for
28 Cameron. I don't recall if Cameron yelled at other employees, but it wouldn't
29 surprise me if Cameron did.

30 On March 7, 2022, I went to Taste of Costa Rica for lunch. At the end of my
31 meal, I saw Cameron saying "What's wrong with you? Work faster!" to Lin.
32 Cameron was within inches of Lin's face. Just then, I received a personal phone
33 call on my cell. I stepped out into the parking lot to take the call.

34 On March 9, Julian Blake came to the police station and asked to speak with me.
35 Julian told me that Julian worked as a consultant for the restaurant and had
36 known the owner, Cameron Aubrey, for many years. Julian said that Julian had
37 witnessed Cameron "mistreating Chef Lin Stark" (Julian's words). Julian
38 described Cameron constantly yelling at or criticizing Lin Stark. Julian worried
39 the long hours demanded of Lin might be illegal. Julian said Cameron had made

40 a comment about seeing firsthand how overworked garment workers were
41 productive. I did not offer an opinion, but thanked Julian for the information and
42 gave Julian my card. That was the only conversation I had with Julian.

43 Based on Julian Blake's statements and my prior observations of Cameron
44 Aubrey and Lin Stark, [as well as Cameron's statement "I don't know who you
45 think you are, but you need to understand something: Everything under that roof
46 is mine."], I went to Taste of Costa Rica on March 10, 2022, at 12:30 p.m. to
47 speak to Lin Stark. As usual, I was in uniform. I waited in my car a short while
48 until I saw Cameron Aubrey leave the restaurant and drive away. I then entered
49 and sat at the counter. When I looked into the kitchen to get Lin's attention, I
50 noticed that Lin looked extremely haggard. A waiter took my order, and I waited
51 for my food.

52 Lin brought me my food personally, which was unusual. Tucked under the plate
53 was a note that read, "PLEASE HELP ME. I'M TREATED LIKE A SLAVE."
54 Immediately, it all began to make sense. Lin was an immigrant who lived on the
55 property. Lin worked all the time. Lin had a terrifying boss [who referred to
56 employees as things]. Lin looked extremely haggard and tired. Before I could
57 say anything, Cameron reappeared and coldly told Lin, "Stop bothering this
58 person and go back to the kitchen."

59 I left the restaurant and obtained a warrant that same day to search Cameron's
60 restaurant and house, as well as Lin's apartment. In the restaurant office, I found
61 a file folder lying on top of Cameron's desk. The folder only contained Lin's
62 TBD-2 visa and passport. Later, I asked Lin about the visa, and Lin said
63 Cameron had held onto the visa since Lin started working at the restaurant.

64 At the restaurant, I examined the stairwell door leading to the stairs to Lin's
65 apartment. The door contained a double-cylinder deadbolt that needed a key on
66 either side. I learned this door was the only entrance to Lin's apartment. When I
67 examined Lin's apartment, it was clear this apartment was in very poor
68 condition. It was dark and dingy with almost no furniture. The bathroom had
69 plumbing problems. Lin told me Cameron had refused to fix any of the
70 apartment's issues.

71 Furthermore, Lin told me Cameron had locked Lin in the apartment the previous
72 night. Lin told me that the day before, Lin had seen a key with a red lanyard
73 under Lin's dresser, but today the key was missing. Lin explained that this key
74 could unlock the door at the bottom of the stairwell. I searched the entire
75 premises but found no key with a red lanyard. I did find a key on Cameron's key
76 ring that fit the lock. I interviewed Frankie Lyman and Frankie told me that
77 Frankie had seen Cameron coming out of Lin's apartment the previous day,
78 hours before Lin had been locked in.

79 Frankie did not see Cameron holding anything. I arrested Cameron Aubrey for
80 human trafficking and false imprisonment.

WITNESS STATEMENT
PROSECUTION WITNESS
Dana Grey
Human Trafficking Expert

1 My name is Dana Grey. I am 46 years old. I received a bachelor's degree in
2 sociology and a master's degree in social work from Central Coast University. I
3 have been working with victims of human trafficking for 20 years. I have served
4 on the boards of national anti-trafficking non-profits. I have taught seminars on
5 identifying and combatting instances of human trafficking for government
6 agencies. I have testified as an expert witness in 27 human trafficking cases, 15
7 times for prosecution and 12 times for the defense. I interviewed Lin Stark on
8 March 11, 2022, the day after Cameron Aubrey was arrested. I also inspected Lin's
9 apartment that day to help form my opinion.

10 A modern-day form of slavery, human trafficking is the use of various forms of
11 force, duress, or deception to make victims do acts or work against their will. The
12 two most common types of human trafficking are sex trafficking and labor
13 trafficking. Labor trafficking can take place in many fields, including domestic
14 service, agriculture, and food service. Anyone can be a human trafficker.

15 In choosing their victims, traffickers often look for vulnerable people who have
16 emotional issues, financial issues, unstable living situations, or all of the above.
17 Immigrants are often targets of human trafficking. Traffickers also often target
18 people who have lower levels of education, who may not be able to understand an
19 employment agreement. Conversely, some victims may be aware that they are
20 being taken advantage of but accept their jobs anyway because of the promises
21 made by the traffickers. Traffickers may promise their victims better lives,
22 stability, education, a high-paying job, or a loving relationship. For example, a
23 trafficker may target someone who needs money to get out of debt or support a
24 family. While certain people are more vulnerable than others, anyone can
25 potentially be a victim of human trafficking.

26 Victims of human trafficking are controlled by their traffickers, often through
27 money, threats of violence, or physical force. Traffickers may also threaten victims
28 with deportation, deny victims their wages, or take away their government
29 identification documents.

30 There are many signs that point to instances of human trafficking. Victims often
31 communicate in a manner that sounds rehearsed. They often live with their
32 traffickers or on the site of their employment. They are psychologically
33 manipulated or controlled by their traffickers. They have no access to their
34 government documents. They have little communication with the outside world.
35 They have poor living conditions. They work extremely long work hours with little
36 to no pay.

37 In my professional opinion, Lin Stark exhibits many factors consistent with those
38 of a human trafficking victim. Lin was vulnerable: Lin was young, unemployed,
39 and desperate for money to support a family. Lin was promised a stable income, a
40 place to live and an opportunity to bring family members to the United States.
41 Although Lin was moderately educated, Lin was new to the culture and customs of

42 the United States, not aware of its laws, and in desperate need of full-time work,
43 making Lin susceptible to exploitation. In my March 11 interview with Lin, Lin
44 told me that Lin was afraid of being deported.

45 Lin told me Lin's story about working at Taste of Costa Rica. Cameron had
46 withheld Lin's immigration documents, making it virtually impossible for Lin to
47 find other work. Cameron overwhelmed Lin with work and prohibited Lin from
48 taking breaks, preventing Lin from being able to come and go as Lin pleased.

49 Cameron also paid Lin a total of \$1,700 over a four-month period, which breaks
50 down to approximately \$425 per month. Even adding room and board, the total
51 would be about \$2.29 per hour for 90-hour work weeks, which Lin told me was
52 normal for Lin. This number may be high compared to many other trafficking
53 cases where victims may make less than \$1.00 per hour if they are paid at all. But
54 Lin's wages are still extremely low compared to the minimum wage. And the
55 hours Lin worked are grossly out of line with state labor and wage laws
56 establishing 40-hour weeks, overtime, and a minimum wage.

57 The apartment that Cameron provided to Lin was somewhat unusual in that Lin
58 had Lin's own room. Traffickers often provide housing for their victims typically
59 in a dormitory-like setting with limited access to adequate showers or toilets. Lin's
60 furnished apartment does not fall into this typical category. But Lin's apartment
61 was dark and isolated with only one means of entry and exit into the restaurant
62 itself. The camp-style bed was inadequate for comfortable long-term living. Lin
63 appeared to have tried to clean the place and to keep it livable. But because of
64 Lin's restricted access to the outside world, the room seemed not very different
65 from a well-furnished prison cell.

66 The fact that Lin was a talented cook does not mean that Lin could not be a victim
67 of human trafficking. Victims of human trafficking can be skilled or unskilled
68 workers in any industry, and are commonly found in the food service industry,
69 whether in large-scale or small-scale businesses. Lin's case is consistent with
70 several of the human trafficking cases I have seen over the years.

WITNESS STATEMENT

DEFENSE WITNESS

Witness Statement

Defense Witness

Cameron Aubrey (Defendant)

1 My name is Cameron Aubrey. I am 43 years old. I recently left my job as a security
2 guard in a garment factory in Southern Minnesota because I inherited a hundred
3 thousand dollars from an aunt who passed away. I always wanted to open a
4 restaurant back home in New Prague. I feel a deep connection to Costa Rican
5 culture since my cousin Devin Tyler and I spent several summers there doing
6 humanitarian relief work as teenagers with the New Prague Community Church
7 youth group. Costa Rican food is also my favorite cuisine. There were no Costa
8 Rican restaurants in New Prague, so I knew I had a niche.

9 I had no idea how to start a restaurant. My cousin Devin has a background in hotel
10 management, so I asked Devin for help. Devin told me Devin could provide me
11 some tips with handling the employment paperwork and suggested I hire Julian
12 Blake, an old friend with restaurant experience to be a consultant. Devin said
13 Julian would help me get things running. Julian and I discussed plans. Julian was
14 concerned about my ability to finance the business. I said money would be tight for
15 a while, but I was confident I could make it work. I told Julian in my previous job,
16 I saw people working hard with a lot of motivation to reach the American Dream.

17 Julian and I found a great property in an industrial area of New Prague that had
18 already been a diner. The rent seemed high to me, but Julian assured me it was
19 reasonable. I used my inheritance and also took out huge loans to remodel the
20 restaurant and furnish the kitchen and cover the overhead costs for a whole year.

21 I also used the loans to pay for Julian's services. If the restaurant made as much
22 money as Julian thought it would, then it would take me about five years to make
23 all my money back and pay off the loans. In the meantime, Julian estimated there
24 would be a small margin of profit to live on. I would turn a larger profit later on. I
25 needed to be very careful about my own expenses, including the mortgage on my
26 house. It was a lot for me to juggle.

27 Julian oversaw the remodeling of the restaurant, and I worked on hiring a staff. At
28 first, Julian insisted on helping me find people. Julian was quite pushy about being
29 involved in every part of the development process. I wanted Julian to focus on
30 remodeling so that we could meet our goal of opening on December 1. I strongly
31 felt the key to the success of the restaurant was hiring a chef who knew Costa
32 Rican cuisine. Devin suggested I put an advertisement in all the local newspapers
33 that circulated in Little Costa Rica.

34 I received a few responses from the ad and interviewed all the candidates. Among
35 them was Lin Stark, who came to the restaurant for an interview and cooking
36 simulation.

37 During the interview, I learned that Lin had no professional cooking experience.
38 However, Lin's food was delicious and authentic and Lin spoke English well, so I
39 offered Lin the job. I was up front with Lin about the fact that I did not yet know
40 how much I could afford to pay Lin. It depended on sales, I said. I also offered to

41 do what I could to help bring Lin's family to the U.S. sometime in the future, but I
42 didn't make any promises.

43 Lin moved in on November 2, 2022. To make Lin feel welcome, I gave Lin money
44 to buy toiletries. I also showed Lin the apartment and told Lin to do whatever Lin
45 wanted to make it feel like home. I told Lin that Lin could use my office phone to
46 call Lin's family every other week, as long as the calls were not too long. Later
47 that day I saw that Lin had closed the door to the staircase. I reminded Lin about
48 the key and told Lin that the door always needed to remain open and Lin looked
49 like Lin understood.

50 During our first month working together, everything was going smoothly. Lin and I
51 worked every day on the menu. I knew when we opened, we would have very little
52 time off. I warned Lin that the first few months would be rough, but that I hoped to
53 eventually hire an assistant cook to make it easier.

54 Once the restaurant opened, Lin worked very slowly. I always had to go into the
55 kitchen to remind Lin to work quickly, especially during the lunch rush. I could tell
56 Lin was struggling to keep up. I was also stressed about the restaurant's part-time
57 staff. I had hired several part-time workers, mostly college students, to work in the
58 dining area. Julian thought I needed more employees, but I could not afford to hire
59 more. The restaurant had so many expenses already.

60 Either Frankie Lyman or I always went to buy wholesale supplies. Soon after the
61 restaurant opened, Lin insisted on going out to buy the vegetables from the
62 wholesaler. I had no objection to Lin doing that, but Lin stayed away too long —
63 taking more than the hour Lin had promised. I realized I could not afford to have
64 Lin take time doing errands. Lin and I had a brief argument about it, and I told Lin
65 how important it was for Lin to leave the errands to Frankie and me. But I never
66 forbade Lin from leaving the premises for any reason.

67 Come to think of it, I thought it odd that Lin seemed to rarely take a break or even
68 step outside. I admit I was stressed out, heavily in debt to keep the restaurant
69 going, and snapped at Lin sometimes. I demanded a lot from Lin, but I had warned
70 Lin that the first few months would be rough. I was right. I felt overwhelmed. Even
71 so, I would often check on Lin in the kitchen to see if Lin had enough supplies and
72 was feeling all right.

73 Julian and I began to have problems. Julian had always been extremely opinionated
74 and always criticized my decisions. Julian told me I

75 "micromanaged" employees. Julian also said I worked Lin too hard and if I wasn't
76 careful, everyone would quit. I was furious. At the end of December, Julian
77 confronted me about Lin's pay. I made it clear that if Julian had a problem with the
78 way I ran my business, Julian was free to leave. I had no desire to work with
79 someone who criticized my every move. Julian immediately resigned.

80 Lin often came to complain to me about different things, like pay and hours.

81 Other than a leaky faucet, I don't recall Lin ever complaining to me about the
82 apartment. As for pay, I paid Lin \$500 for Lin's work in November and \$400 each
83 month for work in December, January and February. I figured this was a fair

84 amount. If you took the value of room, board and utilities, Lin was making
85 between \$800-900 a month. It was all I could afford. I always paid Lin in cash so
86 Lin would not have to pay high check-cashing fees. I also set aside money to pay
87 the appropriate tax withholdings and was planning to forward them once I figured
88 out the employment paperwork. I wanted to do all I could to remove Lin's
89 financial burdens so Lin could send money to Lin's family.

90 When Lin complained to me about the number of hours Lin worked, I told Lin that
91 I worked even more hours than Lin did. I don't know how many hours Lin worked,
92 but I know Lin was very busy when the restaurant was open to customers. I
93 worked about 15 hours a day. We didn't keep time sheets; Lin was a salaried
94 employee. Working long hours is part of working at a restaurant, especially in its
95 first year of business. At the time, there was nothing more I could do to help Lin. I
96 was afraid Lin would quit. I never threatened to have Lin deported.

97 As time went on, Lin continued to struggle in the kitchen. I had taken a risk hiring
98 a chef who had no professional cooking experience. The restaurant was not doing
99 as well as I hoped. I was barely making enough money to cover my personal
100 expenses. At this rate, it was going to take me many years to make back my initial
101 investments. I needed to cut costs as much as possible.

102 On March 7, Lin was having an especially slow day in the kitchen. Many people
103 were waiting to receive their food. I came into the kitchen and saw Lin not
104 working. Lin told me that it was too stressful. After hearing that, I got very close to
105 Lin, looked Lin square in the eye, and told Lin this was no time to give up. We
106 were going to make it through the day and be successful.

107 [That same day, I stopped Officer West outside the restaurant. We had a discussion
108 and the next thing I knew, I was arrested on a bench warrant that I knew was a
109 mistake. The officer started to drive me to the station and then pulled over and
110 asked to see my forearms. The officer was looking for a tattoo. I don't have any
111 tattoos. As the officer turned the patrol car back toward the restaurant, the officer
112 said to me "*Your lucky day. But I still think you're abusive to your cook.*" I blurted
113 out, "*I don't know who you think you are, but you need to understand something:
114 Everything under that roof is mine.*" I meant the restaurant is my business, not
115 West's. I was offended that West would say such a thing and outraged West
116 arrested me for nothing.]

117 On March 9, I went to Lin's apartment to check on the leaking faucet that Lin had
118 told me about back in December. I realized I ought to do something to make Lin's
119 life a little better. I intended to fix the faucet myself either that day or the next.
120 Other than that day, I don't recall ever going into Lin's apartment.

121 Later that night, Lin and I were closing up the restaurant when Lin approached me
122 about taking a vacation. I was frustrated by the events of recent days and knew
123 there was no way the restaurant could afford to go without its chef, even for a
124 couple of days. When Lin suggested I hire a new assistant chef immediately, I
125 feared that business would only get worse. Lin didn't tell me any special reason for
126 the vacation and did not ask for Lin's visa or passport. I refused Lin's request.
127 After hearing this, Lin became extremely upset and started yelling at me. It was
128 startling.

129 Lin then turned and went upstairs. I was so upset and exhausted that I angrily
130 slammed the door behind Lin. I never thought that Lin was stuck behind the self-
131 locking door because there was that key with a red lanyard under the dresser I had
132 mentioned to Lin when Lin moved into the apartment. Just before I left, I yelled to
133 Lin that we both needed to get comfortable here and neither of us could take a
134 vacation.

135 The next day, I arrived at the restaurant at 6:45 a.m. I walked to the cash register to
136 reconcile receipts from the previous day, and I did not see Lin. I didn't even think
137 to look at the stairwell door. About 7:00 a.m., I heard a banging coming from the
138 rear of the restaurant. I went back and saw the stairwell door was closed. I opened
139 it and found an angry Lin standing there. I asked Lin if Lin was missing Lin's key.
140 I couldn't imagine why Lin wouldn't use it. Lin did not answer me and walked
141 away. Lin never told me the key was missing, and the last time I saw the key was
142 when I showed it to Lin when Lin moved in. I had the only other key to that
143 particular door, which I kept on my keychain.

144 In the early afternoon, I saw Lin talking to a customer while many people were
145 waiting for their food. I rushed over to remind Lin about the customers who were
146 waiting, and I told Lin to get back to the kitchen. I did not notice that the person
147 Lin had been speaking to was Officer West. When Officer West came with a
148 search warrant later in the afternoon, I was completely confused. I thought maybe
149 one of my employees had done something wrong. When Officer West searched my
150 office, Officer West asked me why I had Lin's visa and passport. I told Officer
151 West that I was holding onto the papers because I was in the process of finding out
152 how to sponsor Lin for Lin's visa, and to bring Lin's family here. Of course, I
153 would have given it back to Lin if Lin had asked for it, but Lin never did. Officer
154 West then arrested me for human trafficking. I was shocked and felt betrayed by
155 Lin who I treated like a member of my own family. Lin is not a victim of human
156 trafficking.

Witness Statement

Defense Witness

Devin Tyler

1 My Name is Devin Tyler. I am 41 years old. I am Cameron Aubrey's cousin I
2 graduated from New Prague College with a bachelor's degree in hotel
3 management, and I now manage a boutique hotel. I am also a volunteer youth
4 counselor at New Prague Community Church.

5 When Cameron told me about Cameron's inheritance and Cameron's plan to move
6 back home and open a Costa Rican restaurant, I wanted to do all I could to help. I
7 fondly remember our summer trips to Costa Rica with the church youth group.

8 Because of some similarities between hotel management and restaurant
9 management, I offered Cameron advice. I told Cameron that it is extremely
10 difficult for someone with no experience to open a new restaurant. It is also
11 extremely costly. I recommended that Cameron hire a consultant to teach
12 Cameron the basics of restaurant management and help Cameron get the
13 restaurant off the ground. I suggested that Cameron talk to our old friend,

14 Julian Blake, who was a successful restaurant developer.

15 At first, Cameron and Julian seemed to work well together. Before the
16 restaurant opened I would visit several times a week to see how Cameron was
17 doing. I could see that Julian was doing a great job remodeling the property, while
18 Cameron began searching for employees.

19 Cameron asked me about the best way to find a Costa Rican cook. I suggested
20 Cameron place an advertisement in the local newspapers that circulated in Little
21 Costa Rica. I hoped the advertisement would attract people who had experience
22 with Costa Rican cuisine. A few weeks after the advertisement was posted,
23 Cameron told me about Lin Stark, the person Cameron had hired for the job. From
24 what Cameron said, it seemed like Cameron and Lin really connected during
25 Lin's interview. Cameron told me that Cameron loved hearing about Lin's life in
26 Costa Rica, and that Cameron desired to help Lin's family. I was not surprised at
27 all when Cameron told me how well they connected because I know how much
28 Cameron has always loved Costa Rica.

29 I was concerned after Cameron informed me that Lin had never worked in a
30 restaurant before. I was worried Lin would not be able to keep up with the number
31 of customers, especially during the lunch rush. I have seen many good cooks lose
32 their jobs simply because they could not manage the pressure of working in a
33 restaurant. Cameron told me that Cameron wanted to give Lin a chance despite
34 Lin's lack of experience because Cameron really wanted to help support Lin.
35 Cameron planned to cover almost all of Lin's expenses so Lin could send as much
36 money as possible back to Lin's family. Cameron wanted Lin to save enough
37 money to eventually bring Lin's family to the United States. Cameron truly cared
38 about Lin not only because Lin was Cameron's employee but also because Lin
39 was a person in need.

40 In the month before the restaurant opened, I was impressed by how well Cameron
41 and Lin worked together. I would watch them spend hours working on the menu,
42 laughing and dreaming about the future success of the restaurant.

43 But once the restaurant was open, Cameron's relationship with Lin became
44 strained. I often dined at the restaurant and witnessed Lin working very slowly. I
45 also saw Cameron's interactions with Lin. Lin seemed to have a hard time
46 accepting Cameron's constructive feedback and argued with Cameron. I wondered
47 if there was a cultural barrier between Lin and Cameron, where Lin could not
48 understand what Cameron wanted.

49 Cameron often told me how frustrated Cameron was with Lin, especially because
50 Cameron had given Lin so much. Cameron gave Lin a job that helped Lin stay in
51 the United States, as well as free room and board. Lin was adding to Cameron's
52 stress when Cameron already had so much to worry about, especially considering
53 Cameron had loans and invested Cameron's life savings in the restaurant.

54 During December, Cameron also started having problems with Julian. One day, I
55 was at the restaurant and I overheard Julian ranting to Cameron about all the
56 things Cameron was doing wrong. I heard Julian tell Cameron that Julian's way
57 of doing things was the best way, and if Cameron wanted to succeed, Cameron
58 needed to follow all of Julian's directions. Julian also criticized how Cameron
59 treated Lin. I have no idea what Julian meant by this.

60 I thought Julian was too aggressive and opinionated. It seemed like Julian was
61 trying to bully Cameron into doing things that Cameron did not want to do. Maybe
62 Julian was trying to earn more fees. When Julian resigned, I was relieved for
63 Cameron. I also thought without Julian's fees, some of Cameron's financial
64 pressure would be gone. Unfortunately that was not the case. About two months
65 after the restaurant opened, Cameron confided in me that things were not good.
66 Between the loans, payroll, and Cameron's personal expenses, I'm not sure how
67 much longer Cameron could keep the restaurant open. All the revenue Cameron
68 made was barely enough to keep the restaurant going.

69 Although Cameron is inexperienced in the restaurant business, Cameron wants to
70 be the best possible restaurant owner and will do whatever it takes to do so.
71 Cameron asked me for advice on how to properly handle Lin's work-visa a couple
72 of times, as well as how to file taxes for all Cameron's employees. Visas are very
73 complicated and each visa has unique rules employers must follow. I told Cameron
74 to contact an immigration attorney for more details, but I don't think Cameron ever
75 did.

76 For what it is worth, Cameron is the hardest working person I know. More
77 importantly, Cameron has a good heart. Cameron would never intentionally hurt
78 an employee, especially not one that comes from a country that Cameron so deeply
79 loves.

Witness Statement
Defense Witness
Frankie Lyman (Restaurant Employee)

1 My name is Frankie Lyman. I am 19 years old and currently attend New Prague
2 Community College. In October 2022, I was hired by Cameron Aubrey to work at
3 Taste of Costa Rica. I saw a posting on campus that there were job openings at
4 Taste of Costa Rica. I started part-time work on November 2, 2022, the same day
5 Lin began working there.

6 I did a little bit of everything at the restaurant. For example, I ran errands, like
7 buying meat and vegetables, as well as restaurant supplies. That is much of what I
8 did during November. After the restaurant opened, I washed dishes, waited tables,
9 and sometimes did a little food prep, like chopping vegetables.

10 Shortly after the restaurant opened, Lin approached Cameron and insisted that Lin
11 go buy the "right vegetables." Cameron agreed. Lin walked to the wholesale
12 market and when Lin didn't come back for a while, Cameron appeared nervous.
13 When Lin finally arrived, I could hear Cameron ask, "Where were you? We're on
14 a tight schedule! You know better than that." I heard Lin reply, "None of your
15 business." After that, all I know is Lin didn't go out on errands again.

16 I liked working at the restaurant when it opened. The customers were friendly and
17 seemed to really enjoy the food. We had a lot of regular customers like Devin,
18 Cameron's cousin. Often I would see Devin, Julian and Cameron talking at the
19 restaurant. I knew Julian was responsible for setting up and designing the
20 restaurant's interior. In late December, Cameron told the staff that Julian no longer
21 worked at Taste of Costa Rica.

22 As a boss, I would say that Cameron was strict but fair. If I did something slightly
23 different from what Cameron wanted, Cameron would immediately give me
24 constructive feedback. Cameron was always extremely direct when speaking to
25 me. Cameron never sugar-coated anything.

26 I could tell that Cameron cared about all the employees. From when I was first
27 hired, Cameron made an effort to get to know me. Cameron knew about my
28 family, school, friends, and hobbies. I would say that Cameron made an effort to
29 have a personal connection with every employee.

30 Cameron especially cared about Lin Stark. Everyone that worked at the restaurant
31 knew that Cameron really wanted to help Lin. Cameron treated Lin more like a
32 family member and less like an employee. For example, Cameron tried to cover
33 many of Lin's expenses by letting Lin live rent-free and eat as much food as Lin
34 wanted. The rest of the employees were only allowed one meal per shift. Cameron
35 also always seemed to pay close attention to Lin during the day to make sure Lin
36 was okay and doing well. Lin was a hard worker. I would always see Lin there,
37 whether I worked the morning or evening shift.

38 Lin and I got to know each other pretty well. When business was slow, Lin and I
39 spent a lot of time talking about our lives. Lin told me about Lin's family back in
40 Costa Rica and how Lin really wanted to bring them to the United States. One day
41 soon after we started working together in November, I went up to Lin's apartment

42 where Lin showed me pictures of Lin's family. The apartment was not luxurious,
43 but seemed comfortable. Lin often told me about Lin's plans to one day become a
44 U.S. citizen. Two or three times I helped Lin wire money to Lin's mother in Costa
45 Rica. I think it was \$300 or \$350 each time. Lin explained that Cameron had Lin's
46 ID for employment purposes, which made sense to me.

47 When the restaurant became more popular, I saw that Lin was always swamped
48 with orders and obviously had a hard time keeping up. Whenever the restaurant got
49 really busy, Lin would become really flustered. Lin's anxiety often prevented Lin
50 from working quickly in high pressure situations. Whenever Cameron came into
51 the kitchen to give Lin constructive feedback, Lin seemed to ignore Cameron. It
52 was obvious that Lin was having a hard time adjusting to such a fast-paced work
53 environment.

54 However, as the restaurant gained more customers, Cameron became more and
55 more stressed. Cameron sometimes snapped at employees, yelled, or slammed
56 doors. I have been yelled at by Cameron sometimes for improperly prepping food
57 or not completing my responsibilities. Cameron was often in the kitchen making
58 sure orders were timely. Cameron did not like to keep customers waiting. I have
59 seen Cameron get frustrated with Lin and yell a few times when Lin couldn't keep
60 up with the orders. I never felt scared or offended by the yelling. I knew Cameron
61 was just blowing off steam. Cameron had a lot to manage from the restaurant. All
62 the employees needed to pull their weight.

63 One especially busy day in early March, Lin confided in me that Lin was afraid
64 that Lin would lose Lin's job and that Lin's visa might be expiring. Tears were
65 running down Lin's face. I told Lin that Cameron would never fire Lin and that Lin
66 was the best cook in New Prague. Lin then told me that Lin would do anything to
67 stay longer in the United States. Lin seemed desperate.

68 On March 9, in the early evening while Lin was dumping trash out back, I noticed
69 Cameron coming out of the stairwell to Lin's apartment. Cameron told me
70 Cameron was going to fix Lin's leaking faucet. I did not see anything in
71 Cameron's hands. I made a mental note to tell Lin about this good deed.

72 The only time I ever witnessed something really unusual between Cameron and
73 Lin was the next day, on March 10, 2022. I came in to the restaurant in the
74 morning to prep for lunch. As I started my shift and walked toward the employee
75 restroom, I saw Cameron open the stairwell door with a key. I knew that the
76 stairwell door was never supposed to be closed, so I wondered what had happened.
77 In fact I don't recall ever seeing the door closed before. I know the door leads to
78 Lin's apartment. When Cameron opened the door, Lin came out. I heard Cameron
79 tell Lin something about a key. Lin just stood there, looking angry. Cameron
80 stepped away. That's when I told Lin that Cameron had checked on the leaking
81 faucet and would probably fix it soon. I left before the restaurant opened for the
82 day.

83 Later I learned from other employees that Cameron was arrested, I was completely
84 shocked. In all my time working at the restaurant, I never suspected that Cameron
85 was treating Lin unfairly. Cameron was trying hard to encourage us to make the
86 restaurant successful. I never imagined that Cameron could be accused of human

87 trafficking. I always pictured a human trafficker as someone who forced people to
88 do things while sitting back and doing nothing. That was not Cameron. Cameron
89 worked harder than anyone at the restaurant. Cameron never took a break or a day
90 off. Cameron was not always the best boss, but Cameron always gave 100 percent
91 effort and expected everyone else to do the same. It's too bad the restaurant's now
92 closed. I now work at the bookstore at my college.

WITNESS STATEMENT
DEFENSE WITNESS
Addison Frey
Human Trafficking Expert

1 My name is Addison Frey. I am 49 years old. I received a bachelor's degree in
2 Psychology from the University of Minnesota and a master's in social work from
3 Northwestern University. I completed my residency hours at the Hennepin County
4 Medical Center, where I often counseled victims of violent crime as well as
5 trafficking victims. I then worked in private practice as a therapist and consultant,
6 often being contracted by the New Prague Police Department for work in
7 interviewing victims and witnesses of violent crime. During the last 15 years of
8 practice, I have testified in about ten trials as an expert witness in human
9 trafficking cases, six trials on behalf of the defense and four trials on behalf of the
10 prosecution. I have also testified in many more sentencing and post-conviction
11 hearings.

12 I was hired by the defense to reevaluate Dana Grey's findings from the case files. I
13 interviewed Cameron Aubrey about two weeks after Cameron's arrest. I was also
14 given an opportunity to interview Lin Stark about a month after the arrest of
15 Cameron Aubrey to determine whether Lin exhibited indicators of a victim of
16 human trafficking. I agree with Grey's definition of human trafficking, however,
17 not all trafficking situations are the same. Hence, my analysis of the case differs.

18 Typically, labor traffickers target unskilled workers to do menial jobs in industries
19 like domestic service and food service. Traffickers often target multiple workers at
20 one time. These victims are generally subjected to inhumane working and living
21 conditions due to deception or threats of physical violence. Less frequently,
22 traffickers will target a single worker, and when they do, it is almost always in
23 domestic labor, or maid services. Labor trafficking victims are often paid pennies
24 per hour. Some are not paid at all. It is also common for victims of labor
25 trafficking to be financially indebted to their traffickers; traffickers will exploit
26 their victims with the excuse that the victims need to "pay their debt."

27 Cameron's behavior and interactions with Lin do not reflect the actions and
28 attitudes of a human trafficker. Cameron was looking for a skilled laborer to work
29 in a business into which Cameron had invested significant amounts of money.
30 Cameron did choose to hire an immigrant from Costa Rica, but this immigrant had
31 some education.

32 Additionally, Cameron and Lin had a legitimate employment relationship, where
33 Cameron paid Lin every month. Cameron and Lin also worked together on a daily
34 basis, sharing the same workload. Cameron never directly restricted Lin's
35 movements or coerced Lin to perform an action. Cameron also paid Lin
36 significantly higher than the typical human trafficker, which is usually about \$1.00
37 per hour or even less, as Dana Grey also states.

38 Based on my interview with Lin, I do not think that Lin exhibits the signs of
39 human trafficking victims that I have seen over the years. In our interview, Lin told
40 me that Lin had experienced a number of negative symptoms that affected Lin's
41 physical and emotional health. It was clear to me that Lin suffered from anxiety

42 and depression as well as chronic physical pain from Lin's work at the restaurant.
43 However, I believe that Lin's symptoms have more to do with the type of work and
44 less to do with Lin's working conditions. As a young, inexperienced employee
45 with no professional training in food service, Lin was bound to suffer from
46 enormous amounts of stress brought on by the fast-paced nature of the restaurant.
47 Lin's lack of experience as a professional cook would have clearly exacerbated
48 Lin's stress and would have pushed Lin toward bouts of anxiety and depression.

49 Lin's lack of familiarity with American culture and the American workplace may
50 also be contributing factors to Lin's struggle in the workplace. It is plausible that
51 Lin merely misinterpreted Cameron's feedback as yelling and threats to Lin's job.
52 Such a communication barrier may have been highly detrimental to Lin's and
53 Cameron's working relationship, giving Lin the mistaken belief that Cameron was
54 acting as a slave-driver rather than merely a demanding and perhaps unrealistic
55 employer.

56 Lin had Lin's own apartment, which I was able to inspect. It was spartan but
57 habitable. Lin told me Lin was not expressly forbidden from cleaning it or
58 decorating it. I have never seen a human trafficking case in my experience in
59 which a victim had such adequate living quarters with unrestricted access to the
60 outside world.

61 Lin's inability to readily adjust to the pace and pressure of the U.S. foodservice
62 workplace led Lin to suffer many symptoms caused by stress. Lin's mental and
63 physical ailments were magnified by the negative interactions that Lin had with
64 Cameron, leading Lin to believe that Cameron was threatening Lin. Lin's ailments
65 were consistent with overworked employees that I've seen in private practice, none
66 of whom were victims of human trafficking.

PHYSICAL EVIDENCE

Only the following physical evidence may be introduced at trial. The prosecution is responsible for bringing:

1. Exhibit A, Diagram of the floor plan
2. Exhibit B, Note From Lin to Officer West

EXHIBIT A
Taste of Costa Rica Floor Plan

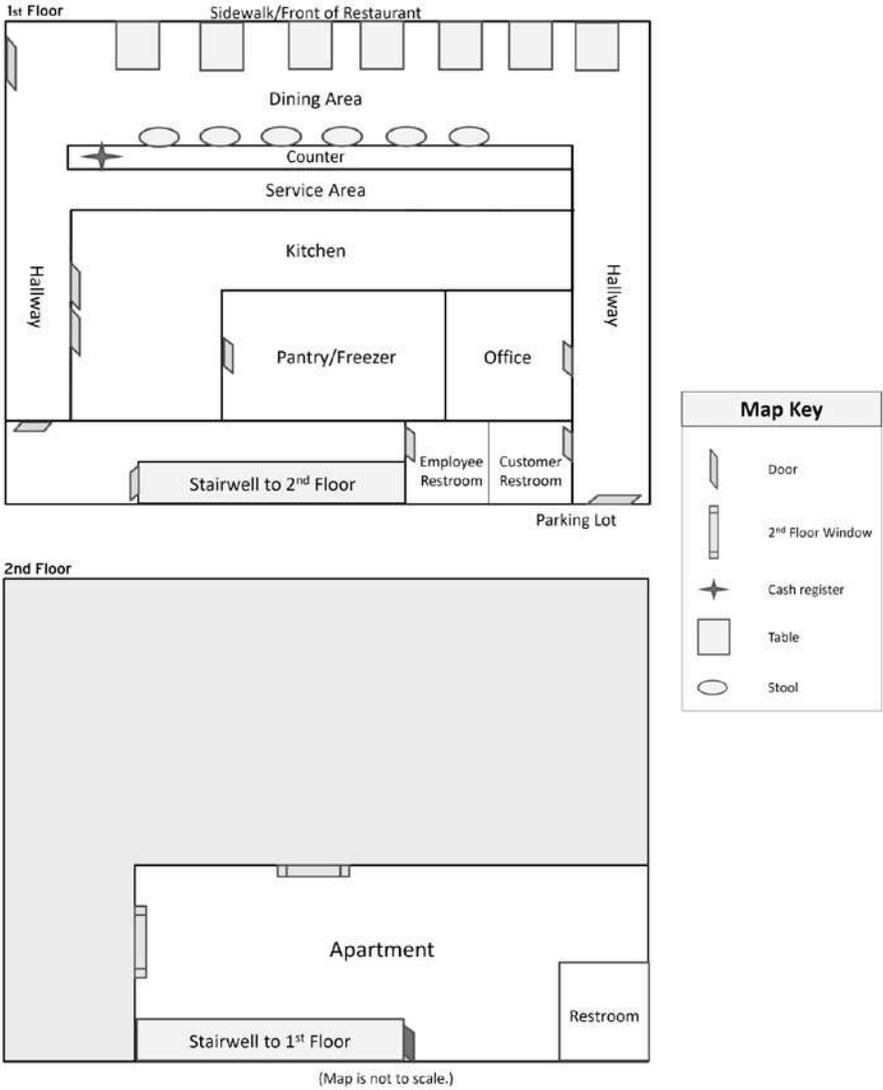
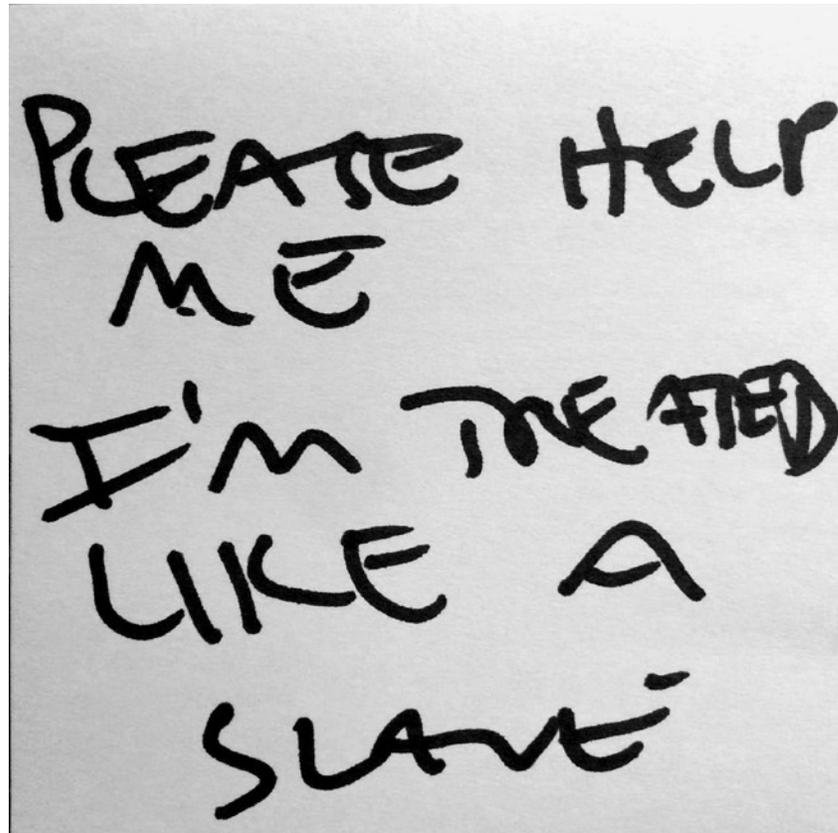


EXHIBIT B

Note From Lin to Officer West

A photograph of a piece of white paper with handwritten text in black ink. The text is written in a casual, slightly slanted cursive style. The first line reads "PLEASE HELP" and the second line reads "ME". The third line reads "I'M TREATED" and the fourth line reads "LIKE A". The fifth line reads "SLAVE".

PLEASE HELP
ME
I'M TREATED
LIKE A
SLAVE

CREDITS

Materials adapted from People v. Awbrey
Constitutional Rights Foundation, California