

**CASE NO. 19-001**  
**MINNESOTA TRIAL COURT**

**STATE OF MINNESOTA V. AUBREY**

***Human Trafficking***

**BACKGROUND INFORMATION**

In August 2017, 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 Ibis, a developing country with a struggling economy. Ibis'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 Ibis cuisine. Cameron's cousin, Devin Tyler, suggested that Cameron place an advertisement in the newspapers that circulated in Little Ibis, a small Ibis 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 Ibis 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 Ibis and had learned to cook Ibis cuisine at home. Lin responded to the advertisement. Lin had been struggling to find work in Ibis. Without a job, Lin was unable to support Lin's family. In need of money, Lin came to the United States in June 2017 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, 2017, 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 Ibis opened on December 1, 2017. 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 2017, Lin received news that Lin's sister was gravely ill. On March 9, 2017, 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, 2017,

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

On March 10, Officer West had lunch again at Taste of Ibis. 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 directly referred to during your trial. Evidence comes from witness testimony.

## **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**

### **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.

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## 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 Ibis 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.

**WITNESS STATEMENT  
PROSECUTION WITNESS**

**Lin Stark  
Victim**

1 My name is Lin Stark. I am 25 years old. I am an immigrant from Ibisa. I had to drop out of  
2 college where I was studying accounting in order to support my aging mom, sick sister, and young  
3 niece. The economy is so bad in Ibisa, I knew there were no real job opportunities for me there, so  
4 in June 2017, I came to the United States. I worked on a TBD-2 temporary work visa as a  
5 housekeeper in a hotel near Little Ibisa. The visa came with several other documents, but I did not  
6 read them because I was just happy to have the visa. My goal was to make enough money to  
7 support my family and maybe one day bring them to the United States.

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

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

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

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

25 That same day, I moved into the studio apartment above the restaurant. It had two windows with  
26 security bars on the outside. There was a fold-up single bed in the corner, a small table with a  
27 table lamp and chair, a tiny bathroom with a small shower, a dresser, and a closet. The bathroom  
28 door was missing. The apartment smelled slightly of mildew and the walls had peeling paint. The  
29 carpet was dirty. Cameron said it was my "new humble home." Cameron also showed me a key  
30 attached to a red lanyard under the dresser to open the downstairs door. Cameron said something  
31 about an "automatic lock," and the door had a sign on it to always stay open. After I put my things  
32 away, I took the key and closed the door at the bottom of the stairwell. I went to a nearby store to  
33 buy personal supplies with fifty dollars that Cameron gave me. I didn't have much and I was  
34 grateful that Cameron helped me out. When I returned, I used my key to unlock the stairwell door.  
35 Cameron saw me and told me the door was to remain open always. After that, I never closed the  
36 door and it was always open. I remember putting the key back under the dresser, and I never  
37 used it again.

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

44 On the day I started, I met Julian Blake and Devin Tyler. I learned that Devin was Cameron's  
45 cousin who managed a hotel, and Julian was helping Cameron remodel the restaurant. During my

46 time at the restaurant, I would occasionally see Devin. Julian was there more often, usually 4–5  
47 times a week. I didn't speak to either Julian or Devin very often because I knew they were busy.

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

49 11 a.m., Monday through Saturday; I had to start working at around 7:30

50 a.m. doing all the food preparation for lunch and dinner myself. We closed at 10:00 p.m. and I  
51 would do all of the clean-up by myself. I normally finished around 11:30 p.m. or midnight.

52 Sundays were also busy days. Although I was supposed to be off, Cameron would make me do  
53 inventory and other tasks.

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

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

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

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

79 My pay was another issue. At the end of November, I received my first payment of \$500 in cash. I  
80 did not have a bank account so I was okay with being paid in cash. However, I don't think \$500 is  
81 a fair wage. I worked so many hours and I think I deserved more money. But Cameron said that  
82 was all Cameron could afford and promised to pay me more later. Overall, Cameron did pay me  
83 \$400 for December and another \$400 each for January and February. I thought that was still low.  
84 When I asked Cameron about it at the end of December, Cameron told me I had no choice in the  
85 matter. This was my pay "until further notice." Cameron asked me if I preferred being back in Ibis  
86 with no job. I became frightened, thinking Cameron might fire me, which would mean I would lose  
87 my visa and be deported. So I accepted my pay as it was.

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

92 In January, I began to suffer mentally and physically. I had endless back, neck, and foot pain from  
93 standing all day, which were magnified by my sleeping on a folding bed. I also began to suffer

94 from anxiety and depression. I was afraid to ask for any time off. I knew I couldn't continue to live  
95 like this.

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

102 On March 9, 2017, as we were closing up for the night, I told Cameron about my sister's condition  
103 and asked to take a couple of days off to see her. I suggested Cameron might finally hire an  
104 assistant cook who could sub for me while I was gone. I also asked Cameron to give me my visa  
105 and passport so I could travel to Ibisa. Cameron became very angry and told me I was not allowed  
106 to leave under any circumstances. In the heat of the moment, I furiously walked away from  
107 Cameron to my apartment. After I walked through the stairwell door, Cameron slammed it behind  
108 me. I heard Cameron say through the door, "You better get comfortable here. It's going to be a  
109 while before you go anywhere!"

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

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

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

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

135 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. Paul, Minnesota. I  
2 have owned or co-owned several diners and small restaurants in Arizona, Nevada, and Minnesota. I  
3 also work occasionally as a restaurant development consultant. I have been an acquaintance of  
4 Cameron Aubrey since we were in high school together.

5 In early August 2017, Cameron called me about an idea to open a Ibis restaurant. Cameron had  
6 been working as a security guard but had inherited some money and wanted to open a restaurant.  
7 Cameron did not have a background in the restaurant business, so Cameron wanted to hire me as a  
8 consultant. I doubted Cameron's inheritance would cover all the expenses of opening a restaurant,  
9 especially paying for the necessary staff. Cameron was confident that Cameron could find just the  
10 right type of hardworking employees. Cameron explained that in Cameron's previous position as a  
11 guard at a garment factory, the boss there had a lot of foreign workers. Cameron said, "He got a lot  
12 out of them for very little cost." I thought nothing of that comment at the time, but later I realized it  
13 meant something ominous. I agreed to help Cameron with the restaurant in exchange for reduced fees  
14 and a five percent share in the profits.

15 At first, things were going great. We began by scouting locations and, in September 2017, we found  
16 an excellent property located in a business park near Downtown New Prague.

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

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

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

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

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

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

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

50 Lin walked away silently, looking at the floor.

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

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

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

66 When I heard Cameron was arrested for human trafficking, I was sad but not surprised. I only  
67 witnessed the first two months of Cameron's relationship with Lin. I can imagine the other months  
68 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 New Prague Police  
2 Department. I have been employed with the New Prague Police Department for seven years. On  
3 March 10, 2017, I arrested Cameron Aubrey for human trafficking and false imprisonment, after  
4 conducting an investigation which included a search of Aubrey's restaurant and residence, as well  
5 as Lin Stark's residence.

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

14 I have been an occasional customer at Taste of Ibis since it opened in December 2017. Over  
15 time, I became acquainted with Lin Stark. The restaurant has a big counter where customers can  
16 sit and see into the kitchen. I usually sat at the counter. Lin was the only cook I ever saw at the  
17 restaurant.

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

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

26 On March 7, 2017, I went to Taste of Ibis for lunch. At the end of my meal, I saw Cameron  
27 saying "What's wrong with you? Work faster!" to Lin. Cameron was within inches of Lin's face. Just  
28 then, I received a personal phone call on my cell. I stepped out into the parking lot to take the  
29 call.

30 On March 9, Julian Blake came to the police station and asked to speak with me. Julian told me  
31 that Julian worked as a consultant for the restaurant and had known the owner, Cameron Aubrey,  
32 for many years. Julian said that Julian had witnessed Cameron "mistreating Chef Lin Stark"  
33 (Julian's words). Julian described Cameron constantly yelling at or criticizing Lin Stark. Julian  
34 worried the long hours demanded of Lin might be illegal. Julian said Cameron had made a  
35 comment about seeing firsthand how overworked garment workers were productive. I did not offer  
36 an opinion, but thanked Julian for the information and gave Julian my card. That was the only  
37 conversation I had with Julian.

38 Based on Julian Blake's statements and my prior observations of Cameron Aubrey and Lin Stark, ,  
39 I went to Taste of Ibis on March 10, 2017, at 12:30 p.m. to speak to Lin Stark. As usual, I was in  
40 uniform. I waited in my car a short while until I saw Cameron Aubrey leave the restaurant and  
41 drive away. I then entered and sat at the counter. When I looked into the kitchen to get Lin's  
42 attention, I noticed that Lin looked extremely haggard. A waiter took my order, and I waited for  
43 my food.

44 Lin brought me my food personally, which was unusual. Tucked under the plate was a note that  
45 read, "PLEASE HELP ME. I'M TREATED LIKE A SLAVE." Immediately, it all began to make sense.  
46 Lin was an immigrant who lived on the property. Lin worked all the time. Lin had a terrifying boss.  
47 Lin looked extremely haggard and tired. Before I could say anything, Cameron reappeared and  
48 coldly told Lin, "Stop bothering this person and go back to the kitchen."

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

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

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

64 Frankie did not see Cameron holding anything. I arrested Cameron Aubrey for human trafficking  
65 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 sociology and a master's  
2 degree in social work from Central Coast University. I have been working with victims of human  
3 trafficking for 20 years. I have served on the boards of national anti-trafficking non-profits. I have  
4 taught seminars on identifying and combatting instances of human trafficking for government  
5 agencies. I have testified as an expert witness in 27 human trafficking cases, 15 times for  
6 prosecution and 12 times for the defense. I interviewed Lin Stark on March 11, 2017, the day after  
7 Cameron Aubrey was arrested. I also inspected Lin's apartment that day to help form my opinion.

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

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

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

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

29 In my professional opinion, Lin Stark exhibits many factors consistent with those of a human  
30 trafficking victim. Lin was vulnerable: Lin was young, unemployed, and desperate for money to  
31 support a family. Lin was promised a stable income, a place to live and an opportunity to bring  
32 family members to the United States. Although Lin was moderately educated, Lin was new to the  
33 culture and customs of the United States, not aware of its laws, and in desperate need of full-time  
34 work, making Lin susceptible to exploitation. In my March 11 interview with Lin, Lin told me that Lin  
35 was afraid of being deported.

36 Lin told me Lin's story about working at Taste of Ibisa. Cameron had withheld Lin's immigration  
37 documents, making it virtually impossible for Lin to find other work. Cameron overwhelmed Lin with  
38 work and prohibited Lin from taking breaks, preventing Lin from being able to come and go as Lin  
39 pleased.

40 Cameron also paid Lin a total of \$1,700 over a four-month period, which breaks down to  
41 approximately \$425 per month. Even adding room and board, the total would be about \$2.29 per  
42 hour for 90-hour work weeks, which Lin told me was normal for Lin. This number may be high  
43 compared to many other trafficking cases where victims may make less than \$1.00 per hour if they  
44 are paid at all. But Lin's wages are still extremely low compared to the minimum wage. And the

45 hours Lin worked are grossly out of line with state labor and wage laws establishing 40-hour weeks,  
46 overtime, and a minimum wage.

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

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

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

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

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

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

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

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

32 During the interview, I learned that Lin had no professional cooking experience. However, Lin's food  
33 was delicious and authentic and Lin spoke English well, so I offered Lin the job. I was up front with  
34 Lin about the fact that I did not yet know how much I could afford to pay Lin. It depended on sales, I  
35 said. I also offered to do what I could to help bring Lin's family to the U.S. sometime in the future,  
36 but I didn't make any promises.

37 Lin moved in on November 2, 2017. To make Lin feel welcome, I gave Lin money to buy toiletries. I  
38 also showed Lin the apartment and told Lin to do whatever Lin wanted to make it feel like home. I  
39 told Lin that Lin could use my office phone to call Lin's family every other week, as long as the calls  
40 were not too long. Later that day I saw that Lin had closed the door to the staircase. I reminded Lin  
41 about the key and told Lin that the door always needed to remain open and Lin looked like Lin  
42 understood.

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

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

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

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

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

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

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

69 Other than a leaky faucet, I don't recall Lin ever complaining to me about the apartment. As for pay,  
70 I paid Lin \$500 for Lin's work in November and \$400 each month for work in December, January and  
71 February. I figured this was a fair amount. If you took the value of room, board and utilities, Lin was  
72 making between \$800-900 a month. It was all I could afford. I always paid Lin in cash so Lin would  
73 not have to pay high check-cashing fees. I also set aside money to pay the appropriate tax  
74 withholdings and was planning to forward them once I figured out the employment paperwork. I  
75 wanted to do all I could to remove Lin's financial burdens so Lin could send money to Lin's family.

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

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

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



90

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

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

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

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

114 In the early afternoon, I saw Lin talking to a customer while many people were waiting for their food.  
115 I rushed over to remind Lin about the customers who were waiting, and I told Lin to get back to the  
116 kitchen. I did not notice that the person Lin had been speaking to was Officer West. When Officer  
117 West came with a search warrant later in the afternoon, I was completely confused. I thought maybe  
118 one of my employees had done something wrong. When Officer West searched my office, Officer  
119 West asked me why I had Lin's visa and passport. I told Officer West that I was holding onto the  
120 papers because I was in the process of finding out how to sponsor Lin for Lin's visa, and to bring  
121 Lin's family here. Of course, I would have given it back to Lin if Lin had asked for it, but Lin never  
122 did. Officer West then arrested me for human trafficking. I was shocked and felt betrayed by Lin who  
123 I treated like a member of my own family. Lin is not a victim of human 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 graduated from New  
2 Prague College with a bachelor's degree in hotel management, and I now manage a boutique hotel. I  
3 am also a volunteer youth counselor at New Prague Community Church.

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

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

12 Julian Blake, who was a successful restaurant developer.

13 At first, Cameron and Julian seemed to work well together. Before the

14 restaurant opened I would visit several times a week to see how Cameron was doing. I could see  
15 that Julian was doing a great job remodeling the property, while Cameron began searching for  
16 employees.

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

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

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

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

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

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

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

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

64 For what it is worth, Cameron is the hardest working person I know. More importantly, Cameron has  
65 a good heart. Cameron would never intentionally hurt an employee, especially not one that comes  
66 from a country that Cameron so deeply 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 Community College.  
2 In October 2017, I was hired by Cameron Aubrey to work at Taste of Ibis. I saw a posting on  
3 campus that there were job openings at Taste of Ibis. I started part-time work on November 2,  
4 2017, the same day Lin began working there.

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

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

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

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

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

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

32 Lin and I got to know each other pretty well. When business was slow, Lin and I spent a lot of time  
33 talking about our lives. Lin told me about Lin's family back in Ibis and how Lin really wanted to  
34 bring them to the United States. One day soon after we started working together in November, I  
35 went up to Lin's apartment where Lin showed me pictures of Lin's family. The apartment was not  
36 luxurious, but seemed comfortable. Lin often told me about Lin's plans to one day become a U.S.  
37 citizen. Two or three times I helped Lin wire money to Lin's mother in Ibis. I think it was \$300 or  
38 \$350 each time. Lin explained that Cameron had Lin's ID for employment purposes, which made  
39 sense to me.

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

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

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

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

62 The only time I ever witnessed something really unusual between Cameron and Lin was the next  
63 day, on March 10, 2017. I came in to the restaurant in the morning to prep for lunch. As I started  
64 my shift and walked toward the employee restroom, I saw Cameron open the stairwell door with a  
65 key. I knew that the stairwell door was never supposed to be closed, so I wondered what had  
66 happened. In fact I don't recall ever seeing the door closed before. I know the door leads to Lin's  
67 apartment. When Cameron opened the door, Lin came out. I heard Cameron tell Lin something  
68 about a key. Lin just stood there, looking angry. Cameron stepped away. That's when I told Lin that  
69 Cameron had checked on the leaking faucet and would probably fix it soon. I left before the  
70 restaurant opened for the day.

71 Later I learned from other employees that Cameron was arrested, I was completely shocked. In all  
72 my time working at the restaurant, I never suspected that Cameron was treating Lin unfairly.  
73 Cameron was trying hard to encourage us to make the restaurant successful. I never imagined that  
74 Cameron could be accused of human trafficking. I always pictured a human trafficker as someone  
75 who forced people to do things while sitting back and doing nothing. That was not Cameron.  
76 Cameron worked harder than anyone at the restaurant. Cameron never took a break or a day off.  
77 Cameron was not always the best boss, but Cameron always gave 100 percent effort and expected  
78 everyone else to do the same. It's too bad the restaurant's now closed. I now work at the bookstore  
79 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 Psychology from the  
2 University of Minnesota and a master's in social work from Northwestern University. I completed my  
3 residency hours at the Hennepin County Medical Center, where I often counseled victims of violent  
4 crime as well as trafficking victims. I then worked in private practice as a therapist and consultant,  
5 often being contracted by the New Prague Police Department for work in interviewing victims and  
6 witnesses of violent crime. During the last 15 years of practice, I have testified in about ten trials as  
7 an expert witness in human trafficking cases, six trials on behalf of the defense and four trials on  
8 behalf of the prosecution. I have also testified in many more sentencing and post-conviction  
9 hearings.

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

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

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

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

33 Based on my interview with Lin, I do not think that Lin exhibits the signs of human trafficking victims  
34 that I have seen over the years. In our interview, Lin told me that Lin had experienced a number of  
35 negative symptoms that affected Lin's physical and emotional health. It was clear to me that Lin  
36 suffered from anxiety and depression as well as chronic physical pain from Lin's work at the  
37 restaurant. However, I believe that Lin's symptoms have more to do with the type of work and less  
38 to do with Lin's working conditions. As a young, inexperienced employee with no professional  
39 training in food service, Lin was bound to suffer from enormous amounts of stress brought on by the  
40 fast-paced nature of the restaurant. Lin's lack of experience as a professional cook would have  
41 clearly exacerbated Lin's stress and would have pushed Lin toward bouts of anxiety and depression.

42 Lin's lack of familiarity with American culture and the American workplace may also be contributing  
43 factors to Lin's struggle in the workplace. It is plausible that Lin merely misinterpreted Cameron's  
44 feedback as yelling and threats to Lin's job. Such a communication barrier may have been highly

45 detrimental to Lin's and Cameron's working relationship, giving Lin the mistaken belief that Cameron  
46 was acting as a slave-driver rather than merely a demanding and perhaps unrealistic employer.

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

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

CLASSROOM COPY  
DO NOT REMOVE

## 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 Ibis Floor Plan

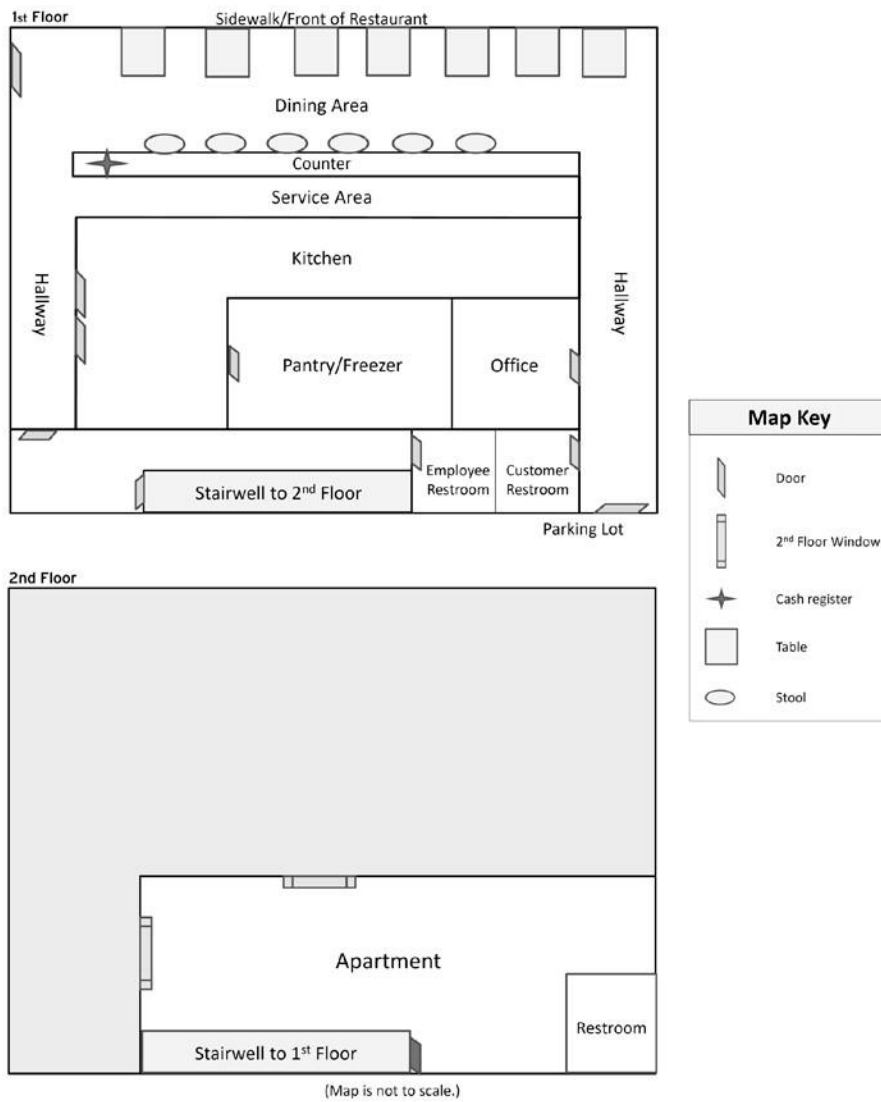
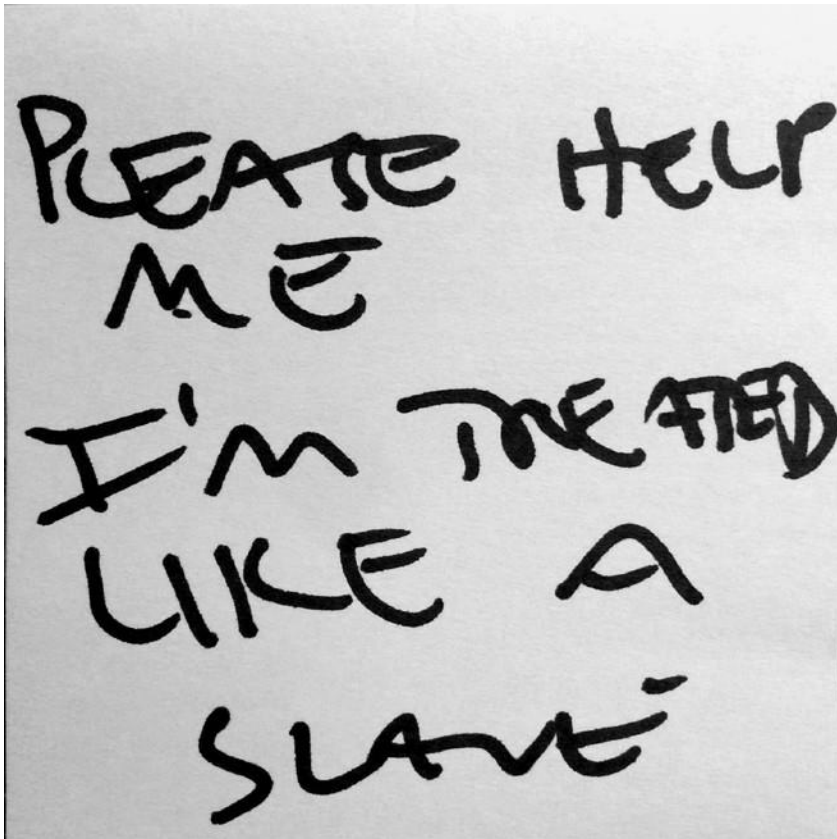




EXHIBIT B

Note From Lin to Officer West



PLEASE HELP  
ME  
I'M TREATED  
LIKE A  
SLAVE

The image shows a handwritten note on a piece of paper. The text is written in black ink and reads: "PLEASE HELP ME I'M TREATED LIKE A SLAVE". The note is set against a light gray background. A large, diagonal watermark reading "COPY REMOVE" is visible across the right side of the page, and another watermark reading "CLASS DO NOT" is visible across the bottom left.

**CREDITS**

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