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5

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 REBEKAH CHARLESTON; ANGELA  
9 DELGADO-WILLIAMS; and LEAH  
ALBRIGHT-BYRD;

10 Plaintiff,

11 vs.

12 STATE OF NEVADA; STEVE SISOLAK,  
13 in his capacity as Governor of the State of  
Nevada, and the  
14 LEGISLATURE OF THE STATE OF  
NEVADA;

15 Defendants.  
16

Case No.: 3:19-cv-00107-MMD-WGC

**FIRST AMENDED COMPLAINT  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

17 **COMES NOW**, Plaintiffs Rebekah Charleston, Angela Delgado-Williams, and Leah  
18 Ablright-Byrd (collectively "Plaintiffs"), by and through their undersigned counsel of record,  
19 and hereby requests an order declaring Nev. Rev. Stat. 201.354(1), Nev. Rev. Stat. 244.345(8),  
20 and the ordinances of Elko, Lander, Lyon, Mineral, Nye, Storey, and White Pine Counties,  
21 licensing brothels unconstitutional, null and void as preempted by federal law; and, a  
22 preliminary and permanent injunction be issued prohibiting the State of Nevada and all of its  
23 political subdivisions from continuing to implement, enforce, or put into force and effect Nev.  
24 Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8).

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I.

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this action pursuant to Title 28 U.S.C. § 1331(2018) and Title 28 U.S.C. § 1343(3) (2018) in that the controversy arises under the United States Constitution and under 42 U.S.C. § 1983 (2018) and 28 U.S.C. § 2201 (2018) and 28 U.S.C. § 2202 (2018). This Court has authority to award attorneys' fees pursuant to 42 U.S.C. § 1988 (2018).

2. Venue is proper in this judicial district under 28 U.S.C. § 1391(b)(2) (2018); as Plaintiffs have operated in, the subject offenses took place in, and a substantial amount of the decisions that are the subject of this civil action were made in this judicial district.

3. An actual controversy exists between the parties within the meaning of 28 U.S.C. § 2201, and this Court has the authority to grant declaratory and injunctive relief pursuant to 28 U.S.C. § 2201 and 28 U.S.C. § 2202.

II.

**PARTIES**

4. Plaintiff, Rebekah Charleston is a resident of the State of Texas. Plaintiff Rebekah Charleston has been directly impacted and harmed by the deprivation and violation of her federal rights under the United States Constitution by the actions of the State of Nevada and its officials under the color of state law by enacting Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8), codifying the language authorizing legalized prostitution in licensed brothels in counties with populations less than seven hundred thousand (700,000) within the State of Nevada.

5. Plaintiff, Angela Delgado-Williams is a resident of the State of Texas. Plaintiff has been directly impacted and harmed by the deprivation and violation of her federal rights under the United States Constitution by the actions of the State of Nevada and its officials

1 under the color of state law by enacting Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat.  
2 244.345(8), codifying the language authorizing legalized prostitution in licensed brothels in  
3 counties with populations less than seven hundred thousand (700,000) within the State of  
4 Nevada.

5         6. Plaintiff, Leah Albright-Byrd is a resident of the State of Texas. Plaintiff has  
6 been directly impacted and harmed by the deprivation and violation of her federal rights under  
7 the United States Constitution by the actions of the State of Nevada and its officials under the  
8 color of state law by enacting Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8),  
9 codifying the language authorizing legalized prostitution in licensed brothels in counties with  
10 populations less than seven hundred thousand (700,000) within the State of Nevada.

11         7. Defendant, State of Nevada (the “State”), organized and existing under, and by  
12 virtue of, the laws of the United States of America, has violated and continues to violate the  
13 United States Constitution by enacting Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat.  
14 244.345(8), and by codifying the language authorizing legalized prostitution in licensed  
15 brothels in counties with populations less than seven hundred thousand (700,000) within the  
16 State of Nevada.

17         8. Defendant, Legislature of the State of Nevada, is the legislative authority of  
18 this State and has violated and continues to violate the United States Constitution by enacting  
19 Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8) without regard to the harm inflicted  
20 on Plaintiffs and others like Plaintiffs who have been illegally trafficked to Nevada to engage  
21 in prostitution, and by codifying the language authorizing legalized prostitution in licensed  
22 brothels in counties with populations less than seven hundred thousand (700,000) within the  
23 State of Nevada.

24         9. Defendant, Steve Sisolak is the Governor of the State of Nevada and is named  
25 in this lawsuit in his official capacity only.

1 III.

2 **GENERAL ALLEGATIONS**

3 **A. 18 U.S.C. 2422(a) Clearly and Unambiguously was Enacted to Prevent**  
4 **Persons from Persuading, Inducing, Enticing, and/or Coercing any Person**  
5 **to Travel Across State Lines to Engage in Prostitution.**

6 10. On June 25, 1910, the 61<sup>st</sup> United States Congress passed H.R. 12315, also  
7 known as “The Mann Act” (the “Act”) (codified as 18 U.S.C. § 2422(a) (2018)), which  
8 criminalized the interstate or foreign commerce transport “of any woman or girl for  
9 prostitution, debauchery, or for any other immoral purpose.” The primary intent was to combat  
10 prostitution, immorality, and human trafficking for the purposes of prostitution in the United  
11 States.

12 11. C.F.R 22 § 40.24(b) (2018) sets forth the meaning of Prostitution as “engaging  
13 in promiscuous sexual intercourse for hire.”<sup>1</sup>

14 12. The Mann Act was amended in 1978, extending coverage to prohibit  
15 transportation for immoral purposes from “any woman or girl” to “any individual” and  
16 increased the penalties specified in the Act.

17 13. The Mann Act was again substantially amended November 7, 1986. In addition  
18 to deleting the terms “debauchery” and “other immoral purpose,” the new language  
19 criminalized coercion and enticement to “travel in interstate or foreign commerce ... to engage  
20 in prostitution” and removed the requirement for transport on an interstate common carrier.  
21 The intent of the Act, specifically to combat prostitution and human trafficking for the  
22 purposes of prostitution, remained unchanged. The current version specifically provides:

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23 <sup>1</sup> Wilder v. Virginia Hosp. Ass'n, 496 U.S. 498, 499, 110 S. Ct. 2510, 2512, 110 L. Ed. 2d 455  
24 (1990). An example of the Court utilizing the C.F.R. meaning of “reasonable” to define the  
25 statutory requirement for what constitutes “reasonable cost” to be paid to healthcare providers.

1           Whoever knowingly persuades, induces, entices, or coerces any  
2 individual to travel in interstate or foreign commerce, or in any Territory  
3 or Possession of the United States, to engage in prostitution, or in any  
4 sexual activity for which any person can be charged with a criminal  
5 offense, or attempts to do so, shall be fined under this title or imprisoned  
6 not more than 20 years, or both.

7 U.S.C. 18 § 2422(a).

8           **B. 18 U.S.C. 1591 Clearly and Unambiguously Was Enacted to Prevent  
9 Persons From Causing any Person in the Jurisdiction of the United States  
10 From Recruiting, Enticing, Harboring, Transporting, Providing,  
11 Obtaining, Advertising, Maintaining, Patronizing, or Soliciting by any  
12 Means, a Person to Engage in a Commercial Sex Act.**

13           14.     On October 28, 2000, the 106<sup>th</sup> Congress passed H.R. 3244, also known as the  
14 “Victims of Trafficking and Violence Protection Act of 2000” (the “TVPA”) (codified as 22  
15 U.S.C. § 7101-7114 (2018)), which criminalized human trafficking and related offenses as  
16 federal crimes with severe penalties attached and established several methods to prosecute  
17 traffickers.

18           15.     U.S.C. 22 § 7102(4) sets forth the meaning of Commercial Sex Act as “any sex  
19 act on account of which anything of value is given to or received by any person.”

20           16.     The issue of trafficking in persons included those trafficked into the  
21 commercial sex industry, modern day slavery, and forced labor.

22           **C. Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8) Directly Conflict  
23 With the Intent of Federal Law Expressed in 18 U.S.C. 2422(A) and 18  
24 U.S.C. 1591 and Otherwise Perpetuate the Harm Federal Law was  
25 Enacted to Redress and Prevent.**

          17.     The reason for vesting the power to regulate commerce in Congress was to  
insure uniformity of regulation against conflicting and discriminating state legislation.  
Addyston Pipe & Steel Co. v. United States, 175 U.S. 211, 227, 20 S. Ct. 96, 101, 44 L. Ed.  
136 (1899).

          18.     “The purpose of Congress is the ultimate touchstone in every pre-emption

1 case.” Wyeth v. Levine, 129 S. Ct. 1187, 1194-1195 (2009) (quoting Medtronic, Inc. v. Lohr,  
2 518 U.S. 470, 485 (1996).

3 19. The Congressional intent of the federal law as expressed through the enactment  
4 of 18 U.S.C. 2422(a) is clear, certain, and unambiguous, *to wit*, to prevent persons from  
5 persuading, inducing, enticing, and/or coercing any person to travel across state lines to  
6 engage in prostitution

7 20. The Congressional intent of the federal law as expressed through the enactment  
8 of 18 U.S.C. 1591 was to ensure just and effective punishment of traffickers and to protect  
9 their victims.

10 21. Nevada is the only state in the Union which allows commercialized  
11 prostitution.

12 22. The State of Nevada has allowed brothel operation since the nineteenth  
13 century; however, the first officially sanctioned brothel was not in operation until 1971 when  
14 the Storey County Commission licensed the Mustang Ranch Brothel.

15 23. Thereafter, the Nevada Legislature passed Assembly Bill 550, (Nev. Rev. Stat.  
16 201.354(1)), authorizing prostitution or solicitation for prostitution in Nevada in designated  
17 brothels licensed by a county. State law presently allows counties of less than seven hundred  
18 thousand (700,000) residents to issue such licenses. Nev. Rev. Stat. 244.345(8).

19 24. There are currently twenty-one (21) operational brothels, located throughout  
20 seven (7) Nevada counties (Elko, Lander, Lyon, Mineral, Nye, Storey, and White Pine).

21 25. The State’s creation of an intrastate commercialized prostitution market exerts  
22 a substantial economic effect, namely, the creation of an interstate and foreign prostitution  
23 market; therefore, Nevada’s legal brothels, operating under Nev. Rev. Stat. 201.354(1) and  
24 Nev. Rev. Stat. 244.345(8), are in violation of and direct conflict with U.S.C. 18 § 2422(a)  
25 (2018). Wickard v. Filburn, 317 U.S. 111, 125, 63 S. Ct. 82, 89, 87 L. Ed. 122 (1942) (holding

1 that Congress's power to regulate “commerce” extends to intrastate activities that have an  
2 “indirect effect” on trade, viz., home-grown wheat).

3       26. Under the cover of Nevada law legalizing prostitution, brothels, brothel owners  
4 and operators, and the women bought and sold in brothels for sex, actively and intentionally  
5 persuade, induce, entice, and coerce men and women to travel in interstate commerce to  
6 engage in prostitution by advertising and marketing brothels and the sale of people for sex to  
7 individuals outside the State of Nevada through hundreds of websites, social media accounts,  
8 and other mass media. **See Exhibit 1 at 0001-0102, (Examples of Advertising and**  
9 **Marketing).** **See also Exhibit 2 at 0103-0106, (Harrison Jacobs, *The owner of America’s***  
10 ***most famous brothel explains how he promotes a business that’s illegal to advertise,***  
11 **BUSINESS INSIDER (Oct. 15, 2015, 6:28p.m.),** [https://www.businessinsider.com/dennis-hof-](https://www.businessinsider.com/dennis-hof-explains-how-he-promotes-a-business-that-is-illegal-to-advertise-2015-10)  
12 [explains-how-he-promotes-a-business-that-is-illegal-to-advertise-2015-10.](https://www.businessinsider.com/dennis-hof-explains-how-he-promotes-a-business-that-is-illegal-to-advertise-2015-10))<sup>2</sup>

13       27. One former brothel owner explained to the “Business Insider” in detail how  
14 he promoted his brothel business nationally and internationally. Jacobs, *supra*.

15       28. Clearly, based on the marketing, advertising and brothel owner’s own  
16 admissions, participants in Nevada’s legal brothel industry are, “knowingly persuad[ing],  
17 induc[ing], entic[ing], or coerc[ing] ... individual[s] to travel in interstate or foreign  
18 commerce... to engage in prostitution,” in violation of federal law.

19       29. Moreover, multiple brothel owners have brazenly spoken publicly of their  
20 efforts to recruit young adult virgins from across all states and/or countries to auction their  
21 virginites at their brothels. **See Exhibit 3 at 0107-0110, (Amy B. Wang, *‘It’s My Decision’:***  
22 ***This Woman is Auctioning Off Her Virginites to Help Her Family,* THE WASHINGTON POST**

23 \_\_\_\_\_  
24 <sup>2</sup>Many individuals sold for sex who are based in Nevada travel. Nearly fourteen percent  
25 (14%) of individuals who are sold for sex in Nevada have a home base within the State but  
advertise across multiple cities or other states. **See Exhibit 7 at Page 9, ¶ 3.**

1 (October 25, 2016), <https://www.washingtonpost.com/news/wonk/wp/2016/10/25/its-my->  
2 decision-this-woman-is-auctioning-off-her-virginity-to-help-her-family/?utm\_term=.fc178e4  
3 8287c.

4 30. Brothel owners and operators in Nevada regularly and with impunity violate  
5 federal law. For example, one brothel owner and manager would send prostituted women out-  
6 of-state to California, Illinois, Georgia, and South Carolina to see established sex buyers  
7 whose credit cards were processed at the brothels during the time the women were  
8 provisioned, though the sex acts occurred, and the buyers were out-of-state. The prostituted  
9 women were placed on airplanes to provision sex acts in the state and city where the out-of-  
10 state sex buyer was located. **See Exhibit 4 at 0111-0114, (Affidavit of Jane Doe Victim 1).**

11 31. As another example, while traveling internationally to Puerto Rico and Ireland,  
12 one brothel owner would recruit women and conduct interviews for women he sought to  
13 recruit to his brothel. *Id.*

14 32. Women at the other brothels were transported by brothel drivers to Lake Tahoe  
15 where they would cross into California where they were purchased for sex. When the brothel  
16 owner became aware of an investigation, drivers were instructed to drop the women off at the  
17 state border between Nevada and California and then the women would have to walk over the  
18 state line into California and get into a taxi to reach their destinations. *Id.*

19 33. While pimped at a Nevada brothel, Deanne Salinger (a woman commonly  
20 referred to as “AirForce Amy”) travelled with a sex buyer to Hawaii and to Mexico from  
21 Nevada to engage in prostitution. *Id.*

22 34. As another example, The Moonlight Bunny Ranch brothel advertised a College  
23 Loan Match Funds Repayment Program “to recruit and entice more educated,” “wholesome-  
24 looking” women to engage in prostitution at the brothel. Under this “program,” the brothel  
25 management promised to match each dollar expended by the women towards repayment of



1 student loans. This advertisement was specifically used to lure women from across the United  
2 States to engage in prostitution in the State of Nevada. *Id.*

3 35. Men from other states and countries are often induced and enticed to travel  
4 across state lines to the State of Nevada to engage in prostitution through various marketing  
5 campaigns like the “Get Your Grandpa Laid” contest hosted in conjunction with the nationally  
6 syndicated Howard Stern Radio Show. See Exhibit 5 at 0115-0116, (*Media Ramsey- Howard*  
7 *Stern Show- Get Grandpa Laid Contest 10/23/13* YOUTUBE (October 23, 2013),  
8 <https://www.youtube.com/watch?v=8sv3n2kBsuw>.

9 36. Brothels in Nevada would not likely be financially viable without the revenue  
10 generated by the efforts of brothel owners, operators and the women being bought and sold  
11 to persuade, induce, entice, or coerce individuals to travel in interstate or foreign commerce  
12 to engage in prostitution.

13 **C. There is A Positive Correlation Between Legal Prostitution and Illegal Sex**  
14 **Trafficking Through Interstate and Foreign Commerce.**

15 37. Legal prostitution and sex trafficking are inextricably linked in Nevada as  
16 elsewhere in the world where prostitution is legal. Sex trafficking happens when and where  
17 there is a demand for prostitution. See Exhibit 6 at 0117-0165 (Seo-Young Cho, Axel  
18 *Dreher, & Eric Neumeyer, Does Legalized Prostitution Increase Human Trafficking?,*  
19 WORLD DEVELOPMENT, at pg. 41, 67-82 (2012),  
20 [https://eprints.lse.ac.uk/45198/1/Neumayer\\_Legalized\\_Prostitution\\_Increase\\_2012.pdf](https://eprints.lse.ac.uk/45198/1/Neumayer_Legalized_Prostitution_Increase_2012.pdf));  
21 See also Exhibit 7 at 0166-0188 (Crysta N. Price, Terry D. Clark, & Julie Faller,  
22 *Nevada's Online Commercial Sex Market, HUMAN TRAFFICKING INITIATIVE, CREIGHTON*  
23 UNIVERSITY (2017), [https://awakenreno.org/wp-](https://awakenreno.org/wp-content/uploads/2018/05/FINAL_Nevada_March2018.pdf)  
24 [content/uploads/2018/05/FINAL\\_Nevada\\_March2018.pdf](https://awakenreno.org/wp-content/uploads/2018/05/FINAL_Nevada_March2018.pdf)); See also Exhibit 8 at 0189-0196  
25 (Melissa Farley, *Trafficking for Prostitution: Making the Connections*, AMERICAN

1 **PSYCHOLOGICAL ASSOCIATION (2007).**

2 38. On average, in jurisdictions with legal prostitution, there is a statistically  
3 significant larger reported incidence of illegal sex trafficking. *Id.* This circumstance is the  
4 result of the increased demand created by the legal sex market. As one expert put it, “wherever  
5 prostitution is legalized, trafficking to sex industry marketplaces in that region increases.”  
6 Cho, *supra* at **pg. 3 ¶2.**

7 39. The U.S. State Department has explained it is the official U.S. Government  
8 position that, “prostitution is inherently harmful and dehumanizing and fuels trafficking in  
9 persons.” **See Exhibit 9 at 0197-0198 (U.S. DEPARTMENT OF STATE, TRAFFICKING IN**  
10 **PERSONS REPORT at pg. 27 (2007)).**

11 40. In 2002, the President of the United States issued a National Security Directive  
12 declaring, “The United States Government opposes prostitution and any related activities,  
13 including pimping, pandering, or maintaining brothels,” because these activities contribute to  
14 human trafficking.<sup>3</sup>

15 41. The U.S. Justice Department has also named Las Vegas among the 17 most  
16 likely destinations for human trafficking.<sup>4</sup>

17 42. The links between legal and illegal prostitution in Nevada and the profound  
18 harms caused by prostitution to all women are like those in other countries where legal  
19 prostitution exists such as the Netherlands and Australia. Wherever legal prostitution exists,  
20 sex trafficking increases. Farley, *supra* at **page 3, ¶2-3.**

21 43. There is more online advertising for the sex trade in Nevada than in any other  
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23 <sup>3</sup> National Security Presidential Directive – 22 (December 16, 2002).

24 <sup>4</sup> Sam Skolnik, *Do we have a human trafficking problem?*, LAS VEGAS SUN, (January 29,  
25 2007).

1 state.<sup>5</sup>

2 44. Nevada's illegal sex trade is estimated to be twice as large as other states.<sup>6</sup>

3 45. According to a Creighton University Study of Nevada's on-line commercial  
4 sex market published in May of 2018, adjusted for population, Nevada's commercial sex  
5 market is by far the largest of any state. **See Exhibit 7 at Page 6, ¶ 1** This circumstance is a  
6 direct result of the legal system used to induce, persuade and entice individuals to enter into  
7 interstate and foreign commerce to engage in prostitution.

8 46. At least five thousand sixteen (5,016) individuals are sold for sex in an average  
9 month in Nevada. Nevada's number of prostituted persons per capita is sixty-three percent  
10 (63%) higher than the next highest state of New York and more than twice as many per capita  
11 as in California. **See Exhibit 7 at Page 5, ¶ 2.**

12 47. Legalized prostitution appears to have done nothing to stem victimization  
13 within the illicit sex trade—the data shows that prostituted persons in the illegal trade around  
14 licensed brothels are at a similar risk of having been trafficked as those in areas without legal  
15 brothels. **See Exhibit 7 Page 21, ¶4.**

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23 <sup>5</sup> Melissa Farley, PROSTITUTION AND TRAFFICKING IN NEVADA: MAKING THE CONNECTIONS  
24 (Prostitution Research & Education, 2007).

25 <sup>6</sup> *Id.*

1           48. Prostitution is modern day slavery.<sup>7</sup> Like those subjected to slavery, the  
 2 prostituted are subject to domination and to the arbitrary will of another person. A woman in  
 3 a Nevada legal brothel explained, “No one really enjoys being sold. It’s like you sign a  
 4 contract to be raped.” **See Exhibit 10 at 0199-0211 (Melissa Farley, *Risks of Prostitution:  
 5 When the Person Is the Product* 3 JOURNAL OF THE ASSOCIATION FOR CONSUMER  
 6 RESEARCH (2017)), <https://www.journals.uchicago.edu/doi/full/10.1086/695670> citing  
 7 (Farley 2007b, 34).**

8           49. Prostitution is inherently an act of sexual coercion, is a form of sexual violence  
 9 and is integrally connected to sex trafficking, drug abuse, brutality, rape, and murder.

10           50. Prostitution and sex trafficking are closely linked. There is no demand for  
 11 sexually trafficked persons per se.<sup>8</sup> Rather, it is the prostitution industry by which sexually  
 12 trafficked persons are exploited. **See** 22 U.S.C.A. § 7101, (Purpose and Findings” of the  
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14 <sup>7</sup> U.S. Department of State, *What is Modern Slavery?*, <https://www.state.gov/j/tip/what/>.

15 The federal government explained:

16           When an adult engages in a commercial sex act, such as prostitution, as the  
 17 result of force, threats of force, fraud, coercion or any combination of such  
 18 means, that person is a victim of trafficking. Under such circumstances,  
 19 perpetrators involved in recruiting, harboring, enticing, transporting,  
 20 providing, obtaining, patronizing, soliciting, or maintaining a person for  
 21 that purpose are guilty of sex trafficking of an adult. Sex trafficking also  
 22 may occur through a specific form of coercion whereby individuals are  
 23 compelled to continue in prostitution through the use of unlawful “debt,”  
 24 purportedly incurred through their transportation, recruitment, or even their  
 25 “sale”—which exploiters insist they must pay off before they can be free.  
 Even if an adult initially consents to participate in prostitution it is  
 irrelevant: if an adult, after consenting, is subsequently held in service  
 through psychological manipulation or physical force, he or she is a  
 trafficking victim and should receive benefits outlined in the Palermo  
 Protocol and applicable domestic laws.

<sup>8</sup> Dorchen A. Leigholdt, *Prostitution and Trafficking in Women: An Intimate Relationship*, 2  
 JOURNAL OF TRAUMA PRACTICE 167, 167-168 (2003).

1 Trafficking Victims Protection Act) (“Many of these persons [sex trafficking victims] are  
2 trafficked into the international sex trade, often by force, fraud, or coercion. The sex industry  
3 has rapidly expanded over the past several decades. It involves sexual exploitation of persons,  
4 predominantly women and girls, involving activities related to prostitution....”). In fact,  
5 prostitution often satisfies the elements of trafficking.<sup>9</sup>

6 51. Moreover, in most cases, the very act of prostitution should be considered sex  
7 trafficking since the exchange of money (or something of value) to obtain a sex act is an act  
8 of sexual coercion.<sup>10</sup>

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13 <sup>9</sup>U.N. ESCOR, COMM’N ON HUMAN RIGHTS *Integration of the Human Rights of Women*  
14 *and a Gender Perspective, Report of the Special Rapporteur on the Human Rights Aspects of*  
15 *the Victims of Trafficking in Persons, Especially Women and Children*, ¶ 42 U.N. Doc.  
16 E/CN.4/2006/62 (Feb. 20, 2006) (Sigma Huda) (“For the most part, prostitution, as actually  
17 practiced in the world, usually does satisfy the elements of trafficking.”)

18 <sup>10</sup> Melissa Farley, *Prostitution is Sexual Violence*, PSYCHIATRIC TIMES (October 1, 2004),  
19 <http://www.psychiatrictimes.com/sexual-offenses/prostitution-sexual-violence>; Melissa  
20 Farley, *Very Inconvenient Truths: Sex Buyers, Sexual Coercion, and Prostitution-Harm-*  
21 *Denial*, THE HAMPTON INSTITUTE (February 26, 2016),  
22 [http://www.hamptoninstitution.org/capitalism-coercion-and-](http://www.hamptoninstitution.org/capitalism-coercion-and-prostitution.html#.WBCyzJMrIRE)  
23 [prostitution.html#.WBCyzJMrIRE](http://www.hamptoninstitution.org/capitalism-coercion-and-prostitution.html#.WBCyzJMrIRE); and Yael Mellul & Lise Bouvet, *Why France Is Adopting*  
24 *A New Law That Criminalizes The Clients, Not Prostitutes*, HUFF POST (April 7, 2016),  
25 [http://www.huffingtonpost.com/yaelmellul/why-france-is-adopting-a\\_b\\_9635988.html](http://www.huffingtonpost.com/yaelmellul/why-france-is-adopting-a_b_9635988.html). “In  
these transactions, the money coerces the sex rather than guaranteeing consent to it, making  
prostitution a practice of serial rape.”

1           52.     According to a 2002 research study<sup>11</sup> of prostituted women in Chicago, nearly  
2 all prostituted persons studied had been “victimized by physical assaults”. Raphael & Shapiro,  
3 *supra* at 18 (showing a table of “12 specific acts of violence [that] are those most frequently  
4 experienced by the respondents”) (“in escort services, half of the women had ever been raped,  
5 and they were also subjected to other forms of violence, including slapping and being grabbed  
6 ... Even women engaging in prostitution in their own residences – women many view as being  
7 in control – reported frequent violence, including 21% having been raped 10 or more times.”).  
8 This level of violence, especially from the hands of sex buyers, speaks to the inherent danger  
9 of being a prostitute, with the most violent aspect of the job being the job itself, interacting  
10 with the customer.

11           53.     Survivors have described their experiences of prostitution as “paid rape,” “pay-  
12 as-you-go rape,” and “being raped for a living.”<sup>12</sup> “Indeed, rape is the defining experience of  
13 prostitution: the fear of it, the daily hypervigilance required to prevent it, the crushing physical  
14 and psychological trauma experienced by victims when it inevitably occurs.”<sup>13</sup>

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20 <sup>11</sup> Raphael, Jody & Deborah L Shapiro, SISTERS SPEAK OUT: THE LIVES AND NEEDS  
21 OF PROSTITUTED WOMEN IN CHICAGO 13 (2002).

22 <sup>12</sup> Rachel Moran, PAID FOR: MY JOURNEY THROUGH PROSTITUTION 112-113  
23 (2013).

24 <sup>13</sup> Lisa Thompson, PROSTITUTED AND SEXUALLY TRAFFICKED PERSONS ARE RAPE VICTIMS,  
25 Too (2016), [https://www.sane-sart.com/prostituted-and-sexually-trafficked-  
PERSONS-ARE-RAPE-VICTIMS-TOO/](https://www.sane-sart.com/prostituted-and-sexually-trafficked-persons-are-rape-victims-too/).

1           54. Nevada’s legal brothels are estimated to generate more than seventy-five  
2 million dollars (\$75,000,000) per year, while Las Vegas’s illegal prostitution market is  
3 estimated to gross over five billion dollars (\$5,000,000,000) per year. **See Exhibit 11 at 0212-**  
4 **0217, (RONALD B. FLOWERS, PROSTITUTION IN THE DIGITAL AGE: SELLING SEX FROM THE**  
5 **SUITE TO THE STREET? at pg. 42-46 (Praeger 2011)).**

6           55. Since the legalization of prostitution has been associated with increased sex  
7 trafficking, the most vulnerable people in the brothel industry are at increased risk for harm.

8           56. Decriminalization of prostitution does not prevent the violence and rape in  
9 prostitution, it assents to it. The State has an important government interest in preventing such  
10 violence; thus, it has an important government interest in preventing prostitution.

11           57. More than thirteen percent (13%) of Nevada prostituted persons are advertised  
12 under the age of twenty-one (21). **See Exhibit 7 at Page 13, ¶ 1.**

13           58. More than one (1) out of every ten (10) prostituted persons in Nevada is too  
14 young to buy alcohol. These young individuals are almost twice as likely to travel in interstate  
15 and foreign commerce while being prostituted compared to those who are twenty-one (21)  
16 and older. **See Exhibit 7 at Page 13, ¶ 2.**

17           59. Many prostituted persons are advertised for their youth, regardless of their  
18 stated age. For example, phrases like “fresh meat,” “brand new,” and “daddy’s little girl” are  
19 all used to connote the youth of prostituted persons. **See Exhibit 7 at Page 13, ¶ 3.**

20           60. Youth is an important characteristic sought by sex buyers in Nevada. **See**  
21 **Exhibit 7 at Page 16, ¶ 1.**

22           61. Evidence of the importance of youth to sex buyers in Nevada comes from the  
23 advertised prices of young prostituted persons. The data shows higher prices are charged for  
24 younger females in Nevada. **See Exhibit 7 at Page 16, Graph 1.**

25           62. The data put Nevada in the top ten (10) states in the country in terms of youth

1 of prostituted persons. See Exhibit 7 at Page 13, ¶ 4.

2 63. Thirty percent (30%) of individuals sold for sex in Nevada are based in other  
3 states, and another fourteen percent (14%) travel within the State. See Exhibit 7 at Page 9, ¶

4 **2.** Moreover, many of the women prostituted in Nevada brothels are not full-time residents  
5 of Nevada, which means that they are being transported in interstate or foreign commerce to  
6 Nevada to be bought and sold for sex in the brothels. Many women prostituted in Nevada  
7 brothels travel from out-of-state and are bought and sold for sex in the brothels for short  
8 periods of time and then return to their domicile state or country.

9 64. For example, in an interview with one media outlet one woman prostituted in  
10 a Nevada brothel admitted to residing in another state in the Midwest and commuting to  
11 Nevada. In the interview, the woman also admitted that men who pay to have sex with her  
12 live in other states and travel in interstate commerce to solicit prostitution. See Exhibit 12 at

13 **0218-0227b (Alice Little, *A Week as a Legal Sex Working in Mound House, NV, on a***  
14 ***\$267,000 Salary* REFINERY 29 (Nov. 13, 2017, 1:40pm),**  
15 ***https://www.refinery29.com/money-diary-nevada-legal-sex-worker-salary; TMZ.com,***  
16 ***Robert Kraft Courted Bt Nevada Prostitutes... It's Legal Here!!! (Feb. 23, 2019, 12:40am)***  
17 ***https://www.tMZ.com/2019/02/23/legal-prostitutes-robert-kraft-sheris-ranch-brothel/*** ).

18 65. Many of women prostituted in Nevada brothels are controlled by outside  
19 pimps: "Despite the fiction that they are "independent contractors," most so-called legal  
20 prostitutes have pimps — the state-sanctioned pimps who run the brothels and, in many cases,  
21 a second pimp who controls all other aspects of their lives (and takes the bulk of their legal  
22 earnings)."<sup>14</sup> One federal court acknowledged this problem recently citing a study that found  
23 that pimps remained common and some assaults against prostituted women occurred within

24 \_\_\_\_\_  
25 <sup>14</sup> Herbert, Bob (2007-09-11). "Fantasies, Well Meant". The New York Times.



1 Nevada’s legal brothels. Coyote Publishing, Inc. v. Miller, 598 F. 3d 592, 596 fn2 (2010).

2         66.       Connections in the Reno/Tahoe area and between Las Vegas and southern  
3 California are regional hubs and stand out as particularly important travel routes for those  
4 entering and exiting interstate commerce to Nevada to engage in prostitution. **See Exhibit 7**  
5 **at Page 21, ¶ 2.**

6         67.       California is by far the most important source of women who are being  
7 prostituted in Nevada from another state. Nearly fifty-five percent (55%) of prostituted  
8 women come from California, whereas Arizona, as the next most important source, supplies  
9 only about five percent (5%). Over the course of a year, women who are being prostituted in  
10 Nevada come from every state in the Union and the District of Columbia. **See Exhibit 7 at**  
11 **Page 9, ¶ 2.**

12         68.       On October 3, 2018, the Lyon County Sheriff’s Office conducted a series of  
13 brothel work card compliance checks, assisted by U.S. Immigration and Customs  
14 Enforcement officers, following a four (4) month internal audit of the inadequate prostitute  
15 registration practices executed by Lyon County staff. **See Exhibit 13 at 0228-0236, (LYON**  
16 **COUNTY SHERIFF’S OFFICE, INTERNAL AUDIT REPORT ON BROTHEL COMPLIANCE**  
17 **REQUIREMENTS (2018),** [http://media.graytvinc.com/documents/LCSO+Internal+Audit](http://media.graytvinc.com/documents/LCSO+Internal+Audit+Report+Brothels.pdf)  
18 [+Report+Brothels.pdf](http://media.graytvinc.com/documents/LCSO+Internal+Audit+Report+Brothels.pdf)).

19         69.       The subject inadequate practices include: US immigration law violations,  
20 foreign country human trafficking indicators, fraudulent statements, issuance of work cards  
21 prior to completing criminal history background checks, and inability to validate out-of-state,  
22 U.S., and other foreign national documents to determine identity.

23         70.       In a statement following the investigations, Sheriff Al McNeil of the Lyon  
24 County Sheriff’s Office noted, “the discovery of U.S. immigration law violations in our legal  
25 brothel system is extremely alarming. The ability to coerce, exploit, and traffic non-U.S.

1 citizens into Lyon County by foreign criminal enterprises is going to be difficult to detect and  
2 deter by our limited capabilities and resources of foreign born applicants.”

3 71. An audit of the Applications for Brothel Work Permits of Lyon County, NV,  
4 discovered that one hundred sixty-eight (168) out of two hundred forty-one (241) applicants  
5 for prostitute work cards reside in a state other than Nevada and must travel in interstate  
6 commerce, from their state of residence to Nevada, to engage in prostitution at the brothels.

7 *Id.*

8 72. Thirty-seven (37) of the women registered for prostitute work cards from Lyon  
9 County in 2017-2018 alone have traveled in foreign commerce, from their international  
10 permanent residence to Nevada, to engage in prostitution at the brothels. *Id.*

11 73. The United Nations Office on Drugs and Crime released a document on Human  
12 Trafficking Indicators that lists thirty-six (36) general indicators and twelve (12) sexual  
13 exploitation indicators. **See Exhibit 14 0237-0239, (UNITED NATIONS OFFICE ON DRUGS**  
14 **AND CRIME, HUMAN TRAFFICKING INDICATORS),** [https://www.unodc.org](https://www.unodc.org/pdf/HT_indicators_E_LOWRES.pdf)  
15 [/pdf/HT\\_indicators\\_E\\_LOWRES.pdf](https://www.unodc.org/pdf/HT_indicators_E_LOWRES.pdf)). According to the Lyon County Sheriff’s report, many  
16 of these indicators were observed during this audit and, therefore, require further  
17 investigation. *Id.*

18 74. The federal government acknowledges the link between prostitution and  
19 trafficking in women and children, as a form of modern-day slavery. **See Exhibit 15 at 0240-**  
20 **0241, (U.S. DEPARTMENT OF STATE, THE LINK BETWEEN PROSTITUTION AND SEX**  
21 **TRAFFICKING (November 24, 2004),** <https://2001-2009.state.gov/r/pa/ei/rls/38790.htm>).

22 75. The women who have been trafficked through Nevada’s legal brothel market  
23 have been subject to the deprivation of rights, privileges, and immunities secured by the  
24 Constitution and Plaintiffs hereby submit this action pursuant to 42 U.S.C. § 1983.

25 ///

1           **D. Plaintiff Rebekah Charleston Was a Victim of Sex Trafficking and Was**  
2           **Forced to Travel Within Nevada and In Interstate Commerce Across**  
3           **State Lines to Engage in Prostitution at Nevada Brothels, Under the Guise**  
4           **of Being a “Willing” Prostitute.**

5           76. Plaintiff Rebekah Charleston (“Ms. Charleston”) has been directly harmed as  
6 a result of Nevada’s statute allowing counties of less than seven hundred thousand (700,000)  
7 people to license brothels and regulate prostitution.

8           77. Ms. Charleston was born in Texas. After living on the streets homeless as a  
9 runaway, she found solace in the arms of a person who seemed to be a nice older boyfriend.  
10 However, soon after, Ms. Charleston realized the true intentions this boyfriend had for her,  
11 which was to abuse and sexually exploit her. Soon thereafter, he trafficked Ms. Charleston for  
12 purposes of commercial sexual exploitation. A short time later, Ms. Charleston was traded to  
13 another trafficker who would violently abuse her while sexually exploiting her all across the  
14 country.

15           78. One of the first stops Ms. Charleston’s sex trafficker made was to the State of  
16 Nevada, where her trafficker forced her to “get a job” at The Moonlight Bunny Ranch brothel.

17           79. Ms. Charleston’s sex trafficker would send Ms. Charleston and others similarly  
18 situated to perform prostitution in the Nevada brothels as a form of punishment.

19           80. Ms. Charleston was not permitted to turn down a sex buyer. None of the acts  
20 in which she engaged being consensual, she was a victim of serial rape for profit.

21           81. The violence Ms. Charleston was subjected to at the hands of men who bought  
22 her was severe and dehumanizing. Ms. Charleston was violently raped and assaulted  
23 numerous times.

24           82. Ms. Charleston was not permitted to come and go as she pleased.

25           83. Ms. Charleston witnessed countless other women who, like her, were being  
trafficked inside Nevada’s legal brothels.

1           84. Ms. Charleston was sexually trafficked at the brothel until her trafficker  
2 decided to move her to Las Vegas for greater profits in the illegal sex trade.

3           85. During the ten years Ms. Charleston was sexually exploited, mostly in  
4 Nevada, Ms. Charleston was forced to work for multiple legal escort agencies in Las  
5 Vegas. Escort agencies in Las Vegas facilitate illegal prostitution to meet the high demand of  
6 people traveling to Nevada to purchase sex, most of whom believe it is legal everywhere in  
7 the state. Legal escort agencies in Las Vegas are fronts for human trafficking rings to  
8 operate. One of the agencies Ms. Charleston was forced to work for was actually owned by a  
9 pimp named Rome who was a known associate of her trafficker.

10           86. This human trafficking ring guised as a legal escort service was successfully  
11 and strategically planted in Las Vegas to intercept sex tourists planning to travel from Las  
12 Vegas to the near city of Pahrump, NV or Crystal, NV where the closest legal brothels were  
13 located.

14           87. Las Vegas is a well-known destination for people who are in the market to buy  
15 women for sex. The advertising and marketing from legal brothels in places like Nye County  
16 and Lyon County persuade, induce and entice people to travel in from across the country and  
17 all over the world to purchase prostituted persons in Nevada.

18           88. Ms. Charleston was sexually trafficked for more than ten (10) years before she  
19 finally escaped when federal authorities became involved.

20           89. Nevada was a regular location for Ms. Charleston to be sex trafficked. No  
21 matter where else her traffickers would take her, they would always return to Nevada to sell  
22 Ms. Charleston and others similarly situated to her because Nevada is the state where there  
23 was and is the greatest demand for prostitution whether legal or illegal.

24  
25

1           **E. Plaintiff Angela Delgado-Williams Was a Victim of Sex Trafficking and**  
2           **Was Forced To Travel Within Nevada and In Interstate Commerce**  
3           **Across State Lines To Engage In Prostitution, Under the Guise of Being a**  
4           **“Legal Escort.”**

4           90. Plaintiff Angela Delgado-Williams (“Ms. Delgado-Williams”) has been  
5 directly harmed as a result of Nevada’s statute allowing counties of less than seven hundred  
6 thousand (700,000) people to license brothels and regulate prostitution.

7           91. Sex trafficking, as defined by the Trafficking Victims Protection Act includes:  
8                           the recruitment, harboring, transportation, provision, or obtaining of  
9                           a person for the purpose of a commercial sex act, in which the  
10                          commercial sex act is induced by force, fraud, or coercion, or in  
11                          which the person induced to perform such act has not attained 18  
12                          years of age.

11          92. Ms. Delgado lived on her own as a seventeen (17) year old adolescent in  
12 Houston, Texas. Ms. Delgado worked two jobs to support herself and was attending college.  
13 Ms. Delgado-Williams came from an economically marginalized family and neighborhood.

14          93. During this vulnerable time in her life, Ms. Delgado-Williams was identified  
15 by her first trafficker, Andre McDaniel.<sup>15</sup> Mr. McDaniel introduced himself to Ms. Delgado-  
16 Williams as a “friend” and would work to gain the trust of Ms. Delgado-Williams, enticing  
17 her to go to his “modeling studio.”

18          94. Ms. Delgado-Williams later learned that Mr. McDaniels’ “modeling studios”  
19 \_\_\_\_\_

20 <sup>15</sup> On Monday, January, 7, 2013, Andre was ordered to serve 96 months in federal prison for his convictions of  
21 conspiracy to commit sex trafficking, one count of coercion and enticement, and two counts of transportation in  
22 relation to Operation Total Exposure, at the time, the largest domestic sex trafficking case in the Southern District  
23 of Texas. <https://www.justice.gov/usao-sdtx/pr/three-sentenced-massive-domestic-sex-trafficking-case>. Mr.  
24 McDaniels was shortly thereafter convicted for witness tampering in connection to the same case.  
25 [https://archives.fbi.gov/archives/houston/press-releases/2013/witness-tampering-lands-convicted-sex-  
trafficker-more-prison-time](https://archives.fbi.gov/archives/houston/press-releases/2013/witness-tampering-lands-convicted-sex-trafficker-more-prison-time) .

1 were illegal brothels disguised as lingerie modeling studios.

2 95. Mr. McDaniels leased buildings in strip malls that were located within a mile  
3 of every big strip club in Houston.

4 96. Mr. McDaniels kept in contact and continued to groom Ms. Delgado-Williams  
5 until she reached the age of eighteen (18). When Ms. Delgado turned the age of eighteen (18),  
6 Mr. McDaniels increased his recruitment tactics.

7 97. Ms. Delgado-Williams had no knowledge of what a pimp was. She just thought  
8 Mr. McDaniels was a rich older man that had other girls from Ms. Delgado-Williams's high  
9 school working for him. Ms. Delgado-Williams only made the observation that peers who  
10 worked for Mr. McDaniels could afford to move away from their poor childhood  
11 neighborhood.

12 98. The other high school peers that "worked" for Mr. McDaniels never disclosed  
13 to Ms. Delgado-Williams the details of what they were doing for Mr. McDaniels at the  
14 "modeling studios."

15 99. Mr. McDaniels was thirty-six (36) years old and Ms. Delgado-Williams was  
16 eighteen (18) years old. Ms. Delgado-Williams later learned that some of the girls who worked  
17 for Mr. McDaniels were seventeen (17) years old and others were younger.

18 100. Mr. McDaniels eventually started treating Ms. Delgado-Williams like the  
19 father she never had.

20 101. Mr. McDaniels supplied Ms. Delgado-Williams with marijuana, and he  
21 supplied other women and girls with Cocaine.

22 102. Ms. Delgado-Williams had no idea what the life of a sex-trafficked woman  
23 was; she thought sex-trafficked women were street walkers only.

24 103. Mr. McDaniels completely isolated Ms. Delgado-Williams.

25 104. Mr. McDaniels groomed Ms. Delgado-Williams to his liking, slowly

1 convincing Ms. Delgado-Williams to change her appearance, such as her hair color.

2 105. Mr. McDaniels spent thousands of dollars on lingerie for Ms. Delgado-  
3 Williams.

4 106. Eventually, through fraud and coercion, Mr. McDaniels brought Ms. Delgado-  
5 Williams to his “modeling studio.”

6 107. The other woman and girls who worked for Mr. McDaniels manipulated Ms.  
7 Delgado-Williams and led her to believe that performing sexual acts on men purchasing sex  
8 was glamorous and that “working” for Mr. McDaniels was not different than anything she  
9 would do for any other boyfriend, except she would get paid extremely well.

10 108. In the beginning, due to the systemized coercion and dehumanization, Ms.  
11 Delgado-Williams minimized the trauma of performing sexual acts on sex buyers since she  
12 was surrounded by other young women trafficked by Mr. McDaniels and his brothers.

13 109. Ms. Delgado-Williams was swiftly forced into performing hand jobs on sex  
14 buyers before she could make sense of the details.

15 110. Ms. Delgado-Williams was not permitted to leave the illegal brothels for  
16 periods as long as twenty-four (24) hours.

17 111. Ms. Delgado-Williams did not even know how to perform some of the sexual  
18 positions the sex buyers were demanding.

19 112. Ms. Delgado-Williams started out by performing hand jobs, and eventually the  
20 sex buyer would complain, and another girl would come in the room to finish the service the  
21 sex buyer desired, whether it was vaginal or anal sex.

22 113. Mr. McDaniels continued to manipulate and groom Ms. Delgado-Williams by  
23 giving her special treatment and hiding the fact that the sex buyers were unhappy with Ms.  
24 Delgado-Williams being uncomfortable performing sexual acts such as vaginal or anal sex on  
25 sex buyers.

1           114. Ms. Delgado-Williams was always the last one to come to the “Cattle Call” in  
2 hopes that a sex buyer would see a different sex trafficked woman first, so she would not have  
3 to perform sexual acts.

4           115. Ms. Delgado-Williams was confused and afraid.

5           116. Mr. McDaniels would tell some of the sex buyers that Ms. Delgado-Williams  
6 was underage. One sex buyer actually paid Ms. Delgado-Williams to dress like a cheerleader  
7 and meet him at the high school bleachers.

8           117. Despite Ms. Delgado-Williams’s distress with performing any sex acts on the  
9 sex buyers, she eventually found herself being sex trafficked, full-time for Mr. McDaniels,  
10 and thereby performing any sex act requested by the sex buyer.

11           118. In common with predator grooming, suddenly, just like the rest of the girls  
12 working for Mr. McDaniels Ms. Delgado-Williams swiftly no longer received special  
13 treatment from Mr. McDaniels, and she rapidly found herself giving all of the money she  
14 earned from sex buyers to Mr. McDaniels.

15           119. Ms. Delgado-Williams was only permitted to go “home” from the “modeling  
16 studio” to the shared living quarters where all the women and girls being sexually exploited  
17 by Mr. McDaniels were forced to live 1 day a week, and sometimes not at all. This was also  
18 the case with the other women and girls that worked for Mr. McDaniels.

19           120. Fortunately, Ms. Delgado-Williams was able to break free from Mr.  
20 McDaniels.

21           121. Subsequently, Ms. Delgado-Williams ended up stripping at a strip club chain  
22 in Houston, Texas.

23           122. While Ms. Delgado-Williams was engaged by the Houston strip club, the club  
24 was cognizant of the fact that Ms. Delgado-Williams was a victim of human trafficking.

25           123. The Houston strip club took advantage of the fact that Ms. Delgado-Williams



1 was a victim of human trafficking and sold her for sex in the strip clubs.

2 124. The Houston strip club not only sold Ms. Delgado-Williams for sex but  
3 generally encouraged prostitution and sex trafficking within the clubs.

4 125. The strip club would provide special treatment to the women who were sent  
5 through the clubs by pimps. Women sent through the clubs by pimps were able to interrupt  
6 and take over dances from other women in the clubs without pimps.

7 126. When the managers of the strip clubs would get upset, they would fire the entire  
8 group of women dancing for the night and rehire them for an extortion fee.

9 127. Ms. Delgado-Williams was introduced to a very violent trafficker through the  
10 Houston strip club.

11 128. While under the sexual servitude to the violent trafficker, Ms. Delgado-  
12 Williams found herself browsing through the classified ads in an effort to escape.

13 129. On or about early 2006, Ms. Delgado-Williams responded to an advertisement  
14 for a job posted by Tarnita Woodward, an employee of Jamal Rashid also known as “Mally  
15 Mall.”

16 130. Mr. Rashid owned many shell corporations to disguise his escort service, and  
17 listed Ms. Woodward as the registered owner of many of these shell companies.

18 131. Ms. Delgado-Williams was hired to work for Mr. Rashid’s company, VIP  
19 Entertainment in Dallas, Texas.

20 132. Ms. Delgado-Williams found herself landing in Las Vegas where the demand  
21 for illegal prostitution was the highest in the illegal sex trade, since sex buyers travel from all  
22 over the country and world to engage in prostitution in Nevada.

23 133. VIP Entertainment, enticed Ms. Delgado-Williams to travel across state lines  
24 from Texas to Las Vegas, Nevada to be sex trafficked, under the guise of working for an  
25 upscale escort service.

1           134. Much like Ms. Delgado-Williams's first trafficker, Mr. Rashid used methods  
2 of fraud to entice the women working for him into thinking that the work performed was  
3 glamorous and that the women were like "Play Boy Bunnies" and he was like Hugh Hefner.

4           135. In the beginning, the grooming tactics of her sex trafficker allowed for Ms.  
5 Delgado-Williams to keep thirty percent (30%) of any monies earned from the escort services  
6 and required her to give Mr. Rashid the remaining seventy percent (70%).

7           136. After subjugation was established by her trafficker, Ms. Delgado-Williams  
8 found herself giving one hundred percent (100%) of the monies earned from "escorting  
9 services" to Mr. Rashid.

10          137. Ms. Delgado-Williams quickly became a "priority girl."

11          138. Priority girls would give all of their incomes to Jamal Rashid.

12          139. Mr. Rashid explained it was necessary for him to receive all of the monies,  
13 because he would in turn take care of the victims living expenses.

14          140. Mr. Rashid was entering the music industry, and he was recognized as a major  
15 pimp in the illegal sex trade in Las Vegas, Nevada.

16          141. Mr. Rashid and his employees began to control every aspect of Ms. Delgado-  
17 Williams's money, from booking her rooms when she traveled from Las Vegas, Nevada to  
18 Chicago, Illinois and Boston, Massachusetts, to providing Ms. Delgado-Williams a small  
19 allowance to cover only food and a hotel while she was traveling to see sex buyers outside the  
20 State of Nevada.

21          142. The only time Ms. Delgado-Williams would hear from Mr. Rashid, instead of  
22 one of his two assistants, was when there was something wrong with the money drops or  
23 deposits to the banks Wells Fargo and Bank of America.

24          143. Most of the sex buyers were under the gross misconception that prostitution  
25 was legal in all of Nevada, and the escort service took advantage of this misconception.

1           144. Ms. Delgado-Williams most frequently interacted with sex buyers who  
2 traveled to Nevada for the sole purpose of purchasing sex, whether it was for a newly divorced  
3 “party,” a bachelor “party,” or a corporate CEO wishing to privately cheat on his wife, the sex  
4 buyers traveled across state lines to purchase sex from victims of sex trafficking.

5           145. In Ms. Delgado-Williams’s experiences with sex buyers, she most frequently  
6 observed that they had the misconception that prostitution was legal in Las Vegas.

7           146. The human trafficking ring guised as a legal escort service was successfully  
8 and strategically planted in Las Vegas, Nevada to intercept sex tourists planning to travel from  
9 Las Vegas, Nevada to the near city of Pahrump, Nevada or Crystal, Nevada where the closest  
10 legal brothels were located.

11           147. As a direct result of the legal brothel establishments legally operating, the  
12 demand for sex was and is higher in Las Vegas, Nevada.

13           148. Not only did the legal brothels’ sex buyers feed the success of the human  
14 trafficking ring guised as an escort service, but it also was another avenue for women to be  
15 sex trafficked. Naturally, being a sex trafficked woman, Ms. Delgado-Williams knew other  
16 women in the sex industry. Ms. Delgado-Williams personally knew numerous women  
17 working in the brothels who were trafficked and sexually exploited in the brothels.

18           149. The escort service trafficked Ms. Delgado-Williams by plane from Las Vegas,  
19 Nevada to perform sex acts for money in large cities such as Dallas, Texas, Los Angeles,  
20 California, Chicago, Illinois and Boston, Massachusetts. After Ms. Delgado-Williams  
21 performed sex acts for money on sex buyers in these large cities, she was trafficked back to  
22 Las Vegas. Nevada.

23           150. Ms. Delgado-Williams was arrested as a result of being trafficked for purposes  
24 of prostitution.

25           151. When Ms. Delgado-Williams was on probation for her prostitution charges,

1 Mr. Rashid coerced her to violate her probation by continuing to sell sex acts performed by  
2 on sex buyers, by assuring Ms. Delgado-Williams that he had a “dream team” of lawyers that  
3 could get them out of anything.

4 152. Mr. Rashid used the money from sex trafficking the women to pay for the  
5 production of his music. Mr. Rashid now works for Grammy award-winning artists, and lives  
6 in a multi-million-dollar home in Encino, California. Mr. Rashid has not faced any criminal  
7 charges for the illegal sex trade he engaged in.

8 153. Eventually, Ms. Delgado-Williams was arrested by Chicago police in Chicago,  
9 Illinois, while being sex trafficked by Mr. Rashid’s company. Ultimately, Ms. Delgado-  
10 Williams served thirteen (13) months in jail.

11 154. After serving her time, Mr. Rashid tried to recruit Ms. Delgado-Williams to  
12 return back to his “Escort Service.”

13 155. Ms. Delgado-Williams moved to Los Angeles, California, where Mr. Rashid  
14 had multiple community apartments for the women and girls who worked for him to use while  
15 they were traveling to be bought for sex from sex buyers or for escort services.

16 156. While in Los Angeles, California, Mr. Rashid forced Ms. Delgado-Williams to  
17 perform oral sex on him.

18 157. While working for Mr. Rashid, Ms. Delgado-Williams understood that she  
19 belonged to “the Game” and/or the “Pimp and Ho” subculture. Ms. Delgado-Williams was  
20 threatened and brainwashed into believing that if she were to prostitute as a “free agent” or  
21 without the representation of a trafficker that she would be opening herself up to be assaulted  
22 or robbed by sex buyers.

23 158. Ms. Delgado-Williams was constantly threatened that if she did not have Mr.  
24 Rashid pimping her out, she would run into another sex trafficker and be treated worse.

25 159. Mr. Rashid tore down Ms. Delgado-Williams’s identity and self-worth so

1 much that he made her believe the only “job” she would ever be able to obtain was one where  
2 she sold sexual acts to sex buyers.

3 160. Eventually after going back and forth between being sex trafficked by Mr.  
4 Rashid and working in the strip clubs, Ms. Delgado-Williams ended up in the strip clubs again,  
5 where Ms. Delgado-Williams met her final sex trafficker.

6 161. Ms. Delgado-Williams’s final sex trafficker came to her with empty promises  
7 of love, and empty promises of retiring her from being a sex trafficked woman.

8 162. Ms. Delgado-Williams was frightened to realize that her final sex trafficker  
9 was extremely abusive.

10 163. Any time Ms. Delgado-Williams would try to escape from the abuse of her sex  
11 trafficker he would intervene by coercing her and severely physically assaulting her.

12 164. Eventually Ms. Delgado-Williams escaped from her final sex trafficker.

13 165. After Ms. Delgado-Williams escaped she moved to a condominium in Las  
14 Vegas, Nevada that had a lack of security. One morning Ms. Delgado Williams’s final sex  
15 trafficker came to her doorsteps with a bouquet of roses and tried to kill Ms. Delgado-  
16 Williams.

17 166. After almost losing her life, Ms. Delgado-Williams was able to escape the grip  
18 of sex traffickers.<sup>16</sup>

19 167. Though Ms. Delgado-Williams suffers from post-traumatic stress disorder  
20 from her near-death assault when her sex trafficker attempted to kill her, she suffers more  
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22 <sup>16</sup> On May 22, 2018, Tyree Wright was sentenced to serve nine and a half (9 ½) years in prison for his charges  
23 of sex-trafficking, second degree kidnapping, and battery with use of a deadly weapon resulting in substantial  
24 bodily harm. [https://www.fox5vegas.com/news/valley-victim-confronts-abusive-pimp-during-his-](https://www.fox5vegas.com/news/valley-victim-confronts-abusive-pimp-during-his-sentencing/article_ec3c3c29-9355-5664-b58d-3b50b1e5ed69.html)  
25 [sentencing/article\\_ec3c3c29-9355-5664-b58d-3b50b1e5ed69.html](https://www.fox5vegas.com/news/valley-victim-confronts-abusive-pimp-during-his-sentencing/article_ec3c3c29-9355-5664-b58d-3b50b1e5ed69.html)

1 from the flashbacks of her memories of being sold and exploited by sex buyers.

2 168. To this day, Ms. Delgado-Williams still suffers from the trauma from her sex  
3 trafficking experiences. Ms. Delgado-Williams cannot enjoy the relaxation of a normal  
4 vacation with her family because of the violence she experienced in hotel rooms across this  
5 country, the majority of which occurred in Las Vegas, Nevada, just miles from legal brothels.

6 169. Las Vegas, Nevada, is a well-known sex tourism destination for people who  
7 are in the market to buy women for sex. The advertising and marketing from legal brothels in  
8 places like Nye County and Lyon County persuade, induce and entice people to travel from  
9 all over the country and the world to purchase prostituted and sex trafficked persons in the  
10 State of Nevada.

11 170. Nevada was a regular location for Ms. Delgado-Williams to be sex trafficked.  
12 No matter where her traffickers would take her, they would always return to Nevada to sell  
13 Ms. Delgado-Williams, and others similarly situated to her, because Nevada is the state where  
14 there was and is the greatest demand for prostitution whether legal or illegal.

15 **F. Plaintiff Leah Albright-Byrd Was a Victim of Sex Trafficking and Was**  
16 **Forced to Travel Within Nevada and In Interstate Commerce Across**  
**State Lines To Engage In Prostitution.**

17 171. Plaintiff Leah Albright-Byrd (“Ms. Albright-Byrd”) has been directly harmed  
18 as a result of Nevada’s statute allowing counties of less than seven hundred thousand  
19 (700,000) people to license brothels and regulate prostitution.

20 172. Like many of the young girls who are manipulated into a life of sex trafficking  
21 under the guise of prostitution, Ms. Albright-Byrd came from a broken, abusive home.

22 173. Ms. Albright-Byrd had been molested at the age of four (4) by a friend of the  
23 family.

24 174. At the age of fourteen (14), after one especially emotionally upsetting  
25 argument with her father, Ms. Albright-Byrd called her best friend who was also fourteen (14)

1 and had been raped by her uncle and father, and they ran away from their Sacramento homes.

2 175. They spent the next several weeks living with different friends and sleeping on  
3 floors in strangers' homes.

4 176. There were predators looking for someone like Ms. Albright-Byrd, someone  
5 who was vulnerable, without money, a home, or anyone watching out for her.

6 177. While on the streets, Ms. Albright-Byrd and her friend were approached by a  
7 twenty (20) year old drug dealer who said she and her friend could stay at his home as long as  
8 they went to school.

9 178. That requirement made Ms. Albright-Byrd think he cared about her. But soon  
10 after, he insisted that the girls contribute to the household. Her trafficker required they either  
11 sell drugs or sell themselves.

12 179. Ms. Albright-Byrd's trafficker coerced her into sex trafficking by using  
13 manipulative tactics to misrepresent that sex trafficking was less harmful than selling drugs.

14 180. Since Ms. Albright-Byrd had no intention of returning home so she stayed with  
15 other underage teen runaway girls to be sold for sex to older men daily.

16 181. Soon after, Ms. Albright-Byrd was introduced to her first trafficker, and his  
17 step brother.

18 182. In October of 1998, Ms. Albright-Byrd was trafficked from Sacramento,  
19 California to Reno, Nevada.

20 183. Though many people have the misconception that a state with legalized  
21 prostitution creates a safer environment for women in the sex industry, Reno, NV is actually  
22 one of the first places where Ms. Albright-Byrd feared for her life when she was cornered by  
23 a threatening "John."

24 184. For the next four years, Ms. Albright-Byrd was trafficked by pimps on the  
25 streets and online.

1           185.    Though her pimps wanted her to “work” the casinos, she was too young, so  
2 she was forced to walk the streets of downtown Reno, NV to solicit sex buyers.

3           186.    In November 1998, Ms. Albright-Byrd was trafficked from Reno to Las Vegas,  
4 NV.

5           187.    While trying to solicit sex buyers in Las Vegas, Ms. Albright-Byrd and her  
6 friend were arrested for not having identification in the casinos.

7           188.    Ms. Albright-Byrd and her friend were taken to a runaway facility that was not  
8 locked down. They ultimately ran away from the runaway facility.

9           189.    It was at this time that Ms. Albright-Byrd and her friend realized the two pimps  
10 that trafficked them down to Las Vegas, had abandoned Ms. Albright-Byrd and her friend.

11           190.    Out of desperation, Ms. Albright and her friend started to walk up and down  
12 the street in Las Vegas, when they were approached by a man in his late 50’s early 60’s in a  
13 purple station wagon.

14           191.    The man offered to give Ms. Albright and her friend a ride, but he ended up  
15 being a pimp. He sold them for sex in Las Vegas for two days.

16           192.    During this time, Ms. Albright-Byrd was transported to different cities within  
17 the State of Nevada and across state lines to the Bay Area in California to be sold for sex.

18           193.    At the age of 16, Ms. Albright-Byrd ended up getting placed into the hands of  
19 the original drug dealer who took her in when she ran away at the age of 14.

20           194.    From the age of 16 until the age of 18, Ms. Albright-Byrd was exploited by  
21 this trafficker traveling from the Bay Area in California to Reno for as little as a weekend to  
22 make money off the sex tourism demand from Hot August Nights<sup>17</sup>, to staying as long as  
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24 <sup>17</sup> Hot August Nights was interestingly created to fill a void in tourism during the month of August in Reno and  
25 is clearly primarily funded by tourists traveling from all over the country into Nevada to participate and spectate.



1 several weeks or a month to sell sex to the locals off the streets in downtown Reno and in the  
2 casinos.

3 195. Ms. Albright-Byrd most frequently witnessed sex buyers have the  
4 misconception that prostitution was legal in Reno, NV.

5 196. As a direct result of the legal brothel establishments legally operating, the  
6 demand for sex was higher in Reno.

7 197. While Ms. Albright-Byrd was in Reno being exploited, her trafficker  
8 introduced her to one of his other victims. This victim was being trafficked into the Bunny  
9 Ranch legal brothel.

10 198. The only thing Ms. Albright-Byrd remembers about the other victim is the  
11 victim was forced to give all of her money to the trafficker that she earned from the Bunny  
12 Ranch.

13 199. Ms. Albright-Byrd was also trafficked from the Bay Area down to Las Vegas,  
14 NV since the demand for sex was so high, she would generally stay in Las Vegas for longer  
15 periods of time from one week to multiple months.

16 200. Las Vegas is a well-known destination for people who are in the market to buy  
17 women for sex. The advertising and marketing from legal brothels in places like Lyon County  
18 and Nye County persuade, induce and entice people to travel in from across the country and  
19 all over the world to purchase prostituted persons in Nevada.

20 201. Nevada advertises as a sex tourism state, so most sex buyers were under the  
21 gross misconception that prostitution was legal in all counties of Nevada, and the sex  
22 traffickers took advantage of this misconception.

23 202. Notably, Ms. Albright-Byrd was under the gross misconception that  
24 prostitution and sex trafficking was legal in Nevada.

25 203. When Albright-Byrd would attempt to leave, her pimp assaulted her. He would

1 assault her on city streets, and no one would call the police.

2       204. Besides walking the streets and “working” in the casinos, Ms. Albright-Byrd’s  
3 pimp would take pictures of her posted them on internet sites where they got rated for their  
4 performances.

5       205. Ms. Albright-Byrd most frequently interacted with sex buyers in Las Vegas  
6 whom traveled to Nevada for the sole purpose of purchasing sex.

7       206. Nevada was a regular location for Ms. Albright-Byrd to be sex trafficked. No  
8 matter where else her traffickers would take her, they would always return to Nevada to sell  
9 Ms. Albright-Byrd and others similarly situated to her because Nevada is the state where there  
10 was and is the greatest demand for prostitution whether legal or illegal.

11       207. It was not until years later, when Ms. Albright-Byrd had escaped from the cycle  
12 of abuse, was she able to realize the victimization, exploitation, and abuse that had occurred  
13 to her.

14       208. Years after Ms. Albright-Byrd was able to escape of the life of being a sexually  
15 exploited victim of sex trafficking, she learned again of a terrible act of violence that happened  
16 to one of her friends whom she introduced to the “life.” Her good friend was murdered in Las  
17 Vegas from a violent sex buyer.

18       209. The most disturbing instances of violence happened to Ms. Albright-Byrd and  
19 her friends in the only State in the Union where Prostitution is legal. Notwithstanding the fact  
20 that these Statutes are in direct conflict with the Mann Act and the Victims of Trafficking and  
21 Violence Protection Act of 2000, it is clear that the legalized prostitution has not kept the  
22 streets of the illegal sex trade safer. In fact, it has made them worse.

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1 IV.

2 **FIRST CAUSE OF ACTION**

3 **Violation of Civil Rights: 42 U.S.C. § 1983, Fourteenth Amendment**

4 **State Created Danger**

5 210. Plaintiffs reallege and incorporate the allegations set forth in the preceding  
6 paragraphs as though fully set forth herein.

7 211. By disregarding federal law, the acts of Defendants, including, but not limited  
8 to, authorizing a legalized commercial prostitution market to operate in the State, have created  
9 the danger that has led to irreparable harm to Plaintiffs and other victims of sex trafficking by  
10 exposing them to the dangers of sex trafficking and prostitution without protections from the  
11 inherent dangers the federal law was enacted to prevent.

12 212. As a direct and proximate consequence of the acts of Defendants' agents and  
13 employees, Plaintiffs have suffered and continue to suffer actual, continual, and potential  
14 injury to their health and safety.

15 **SECOND CAUSE OF ACTION**

16 **Violation of Civil Rights: 42 U.S.C. § 1983, Fourteenth Amendment**

17 **Deprivation of Federal Rights**

18 213. Plaintiffs reallege and incorporate the allegations set forth in the preceding  
19 paragraphs as though fully set forth herein.

20 Section 1983 of 42 U.S.C. provides:

21 Every person who, under color of any statute, ordinance, regulation,  
22 custom, or usage of any State or Territory or the District of Columbia,  
23 subjects, or causes to be subjected, any citizen of the United States  
24 or other person within the jurisdiction thereof to the deprivation of  
any rights, privileges, or immunities secured by the Constitution and  
laws, shall be liable to the party injured in an action at law, suit in  
equity, or other proper proceeding for redress.

25 214. As a direct result of Nevada State officials and lawmakers disregarding United

1 States Code, the Plaintiffs and similarly situated Jane Doe victims who have been prostituted  
2 in the State of Nevada from out-of-state, have been deprived of their federal rights which have  
3 been provided to them under the Mann Act (U.S.C. 18 § 2422(a)) and the TVPA (22 U.S.C.  
4 § 7101-7114). The federal law is clear on its face in prohibiting traveling in interstate and  
5 foreign commerce to engage in the act of prostitution or human trafficking. Nev. Rev. Stat.  
6 201.354(1) and Nev. Rev. Stat. 244.345(8) unconstitutionally conflict with federal law and  
7 create an impermissible legal environment where brothels, brothel owners and operators, and  
8 women being bought and sold in brothels encourage, persuade and entice individuals into  
9 interstate and foreign commerce to engage in prostitution.

10 215. The continued enactment of Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat.  
11 244.345(8) and each and every county ordinance enacted under these statutes is  
12 unconstitutional.

13 216. By enacting Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8),  
14 Nevada has created and nurtured an industry that directly violates the Mann Act, and therefore,  
15 the State of Nevada is the proximate cause of the continued frequent acts of the brothel owners,  
16 and the women sold in the brothels who knowingly persuade, induce, entice, or coerce men  
17 and women to travel in interstate or foreign commerce, or in any Territory or Possession of  
18 the United States, to engage in prostitution and at times, human trafficking.

19 **THIRD CAUSE OF ACTION**

20 **Declaratory/Injunctive Relief –**

21 **Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8)**

22 **Are Preempted by Both The Mann Act (U.S.C. 18 § 2422(a))**  
23 **and the TVPA (22 U.S.C. § 7101-7114) and are in Violation of**

24 **The Supremacy Clause of The U.S. Constitution**

25 217. Plaintiffs reallege and incorporate by reference all prior and subsequent

1 paragraphs as if fully incorporated herein.

2 218. On June 25, 1910, the 61<sup>st</sup> United States Congress passed H.R. 12315, also  
3 known as “The Mann Act” (the “Act”) (codified as 18 U.S.C. § 2422(a) (2018)), which  
4 criminalized the interstate or foreign commerce transport of “any woman or girl for  
5 prostitution, debauchery, or for any other immoral purpose.”

6 219. C.F.R. 22 § 40.24(b) sets forth the meaning of Prostitution as “engaging in  
7 promiscuous sexual intercourse for hire.” The Mann Act specifically provides:

8           Whoever knowingly persuades, induces, entices, or coerces any  
9 individual to travel in interstate or foreign commerce, or in any  
10 Territory or Possession of the United States, to engage in  
11 prostitution, or in any sexual activity for which any person can be  
12 charged with a criminal offense, or attempts to do so, shall be fined  
13 under this title or imprisoned not more than 20 years, or both.

12 U.S.C. 18 § 2422(a).

13 220. The Congressional intent of the federal law as expressed through the enactment  
14 of 18 U.S.C. 2422(a) is clear, certain, and unambiguous, *to wit*, to prevent persons from  
15 persuading, inducing, enticing, and/or coercing any person to travel across state lines to  
16 engage in prostitution.

17 221. On October 28, 2000, the 106<sup>th</sup> Congress passed H.R. 3244, also known as the  
18 “Victims of Trafficking and Violence Protection Act of 2000” (the “TVPA”) (codified as 22  
19 U.S.C. § 7101-7114), which criminalized human trafficking and related offenses as federal  
20 crimes with severe penalties attached and established several methods to prosecute traffickers.

21 222. Sex trafficking, as defined by the Trafficking Victims Protection Act includes  
22 all pimping and sex buying. And the definition of trafficking in the Palermo Protocol states  
23 that prostitution carried out by “the abuse of power or of a position of vulnerability” is sex  
24 trafficking and that consent is no defense when power and vulnerability have been  
25 abused. Prostitution carried out by “force, fraud, or coercion” is not a requirement for sex

1 trafficking but for a “severe form of trafficking.”

2       223. U.S.C. 22 § 7102(4) sets forth the meaning of Commercial Sex Act as “any sex  
3 act on account of which anything of value is given to or received by any person.”

4       224. The Congressional intent of the federal law as expressed through the enactment  
5 of 18 U.S.C. 1591 was to ensure just and effective punishment of traffickers and to protect  
6 their victims.

7       225. There are three ways in which federal law will preempt state law: (1) Congress  
8 explicitly defines the extent to which its enactment preempts state law, or “express”  
9 preemption; (2) state law regulates conduct in a field that Congress intended federal  
10 government to occupy exclusively, or “field” preemption; and (3) state law actually conflicts  
11 with federal law, or “conflict” preemption. Motus v. Pfizer, Inc. 127 F. Supp.2d 1085, 1091  
12 (Ca. C.D. 2000). Here, Nevada law is preempted by way of “conflict” with Federal law.

13       226. Nevada’s intrastate commercialized prostitution market exerts a substantial  
14 economic effect, namely, the creation of an interstate and foreign prostitution market;  
15 therefore, Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8) are in direct conflict with  
16 and violation of U.S.C. 18 § 2422(a) and 22 U.S.C. § 7101-7114.

17       227. By disregarding federal law, the acts of Defendants, including, but not limited  
18 to authorizing a legalized commercial prostitution market to operate in the State, have created  
19 the danger that has led to irreparable harm to Plaintiffs and other victims of sex trafficking by  
20 exposing them to the dangers of sex trafficking and prostitution without protections from the  
21 inherent dangers the federal law was enacted to prevent.

22       228. Because the brothel industry in Nevada openly and notoriously persuades,  
23 induces, entices, and coerces individuals to travel in interstate commerce to commit acts of  
24 prostitution, Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8) cannot exist  
25 simultaneously with 18 U.S.C. § 2422(a) and 22 U.S.C. § 7101-7114 and thereby is preempted

1 and in violation of the Supremacy Clause of the U.S. Constitution.

2 V.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs respectfully request that this Court grant the following relief:

5 A. For an Order declaring Nev. Rev. Stat. 201.354(1), Nev. Rev. Stat. 244.345(8),  
6 and the ordinances of Elko, Lander, Lyon, Mineral, Nye, Storey, and White Pine Counties,  
7 licensing brothels unconstitutional, null and void as preempted by federal law;

8 B. A preliminary and permanent injunction be issued prohibiting the State of  
9 Nevada and all of its political subdivisions from implementing, enforcing, or putting into force  
10 and effect Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8);

11 C. For an order requiring that: 1) the State allocate funds in an amount not less  
12 than Two Million Dollars (\$2,000,000) per year to the State Contingency Account specifically  
13 for people seeking to exit the sex trade (“Nevada Sex Trade Exit Fund”) and receive services  
14 such as mental health services, rent assistant, job training, scholarships, funding for childcare,  
15 medical treatments, tattoo removal, etc. 2) The Nevada Sex Trade Exit Fund require that all  
16 recipients of money from The Nevada Sex Trade Exit Fund provide proof of having been  
17 prostituted in Nevada through Nevada’s legal brothels as a result of the enactment of Nev.  
18 Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345-(8); 3) Any person who was ever in brothel  
19 ownership or brothel management is ineligible to receive funding from the Nevada Sex Trade  
20 Exit Fund; and 4) The Nevada Sex Trade Exit Fund remain funded and running for ten (10)  
21 years from the date Nev. Rev. Stat. 201.354(1) and Nev. Rev. Stat. 244.345(8) is declared null  
22 and void.

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1 D. For an award of reasonable attorneys' fees, costs, and litigation expenses plus  
2 interest accruing thereon, in their favor at the maximum rate allowed by law; and

3 E. For such other relief as the Court or jury may deem just or equitable.

4 DATED this 18<sup>th</sup> day of March, 2019. HUTCHISON & STEFFEN, PLLC

5

6 By: /s/ Jason D. Guinasso

7 JASON D. GUINASSO, ESQ. (SBN# 8478)

8 *Attorney for Plaintiffs*

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VERIFICATION

STATE OF TEXAS )  
DALLAS COUNTY ) ss.

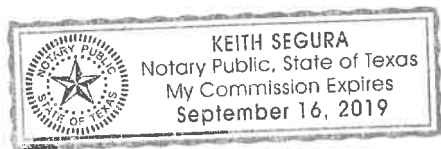
I, Angela Delgado-Williams, being first duly sworn, under penalty of perjury, do hereby depose and say:

I am a Plaintiff in this action, and I have read the foregoing First Amended Complaint, know the contents of the First Amended Complaint and the matters stated therein are true of my own knowledge, except for those matters stated on information and belief, and, as to those matters, I believe them to be true.

DATED: This 18<sup>th</sup> day of March, 2019. Angela D. Williams  
Angela Delgado-Williams

SUBSCRIBED and SWORN to before me  
this 18<sup>th</sup> day of March, 2019.

NOTARY PUBLIC





**List of Exhibits**  
**See Appendix to Plaintiffs' First Amended Complaint for Declaratory and Injunctive Relief**

<b><u>Description</u></b>	<b><u>Vol No.</u></b>	<b><u>Page Nos.</u></b>
Exhibit 1 - Examples of Advertising and Marketing	I	0001-0102
Exhibit 2 - Harrison Jacobs, The owner of America's most famous brothel explains how he promotes a business that's illegal to advertise, Business Insider (2015)	I	0103-0106
Exhibit 3 - Amy B. Wang, 'It's my decision': This woman is auctioning off her virginity to help her family, The Washington Post (2016)	I	0107-0110
Exhibit 4 - Affidavit of Jane Doe Victim 1	I	0111-0114
Exhibit 5 - YouTube link of Howard Stern "Get My Grandpa Laid Contest"	I	0115-0116
Exhibit 6 - Seo-Young Cho, Axel Dreher & Eric Neumayer, <i>Does Legalized Prostitution Increase Human Trafficking?</i> , WORLD DEVELOPMENT (2012)	I	0117-0165
Exhibit 7 - Crysta N. Price, Terry D. Clark, & Julie Faller, Nevada's Online Commercial Sex Market, Human Trafficking Initiative, Creighton University (2017))	I	0166-0188
Exhibit 8 - Melissa Farley, Trafficking for Prostitution: Making the Connections American Psychological Association (2007)	I	0189-0196
Exhibit 9 - U.S. DEPARTMENT OF STATE, TRAFFICKING IN PERSONS REPORT AT PG. 27 (2007)	I	0197-0198
Exhibit 10 - Melissa Farley, Risks of Prostitution: When the Person Is the Product 3 Journal of the Association for Consumer Research (2017)	I	0199-0211
Exhibit 11 - Ronald B. Flowers, Prostitution in the Digital Age: Selling Sex From the Suite to the Street? at pgs. 42-46 (Praeger 2011)	I	0212-0217
Exhibit 12 - Alice Little, A Week as a Legal Sex Working in Mound House, NV on a \$267,000 Salary Refinery 29 (2017); TMZ.com, Robert Kraft Courted Bt Nevada Prostitutes... It's Legal Here!!! (Feb. 23, 2019, 12:40am)	I	0218-0227b

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Exhibit 13 – Lyon County Sheriff’s Office, Internal Audit Report on Brothel Compliance Requirements (2018)	I	0228-0236
Exhibit 14 - United Nations Office on Drugs and Crime, Human Trafficking Indicators	I	0237-0239
Exhibit 15 - U.S. Department of State, The Link Between Prostitution and Sex Trafficking (November 24, 2004)	I	0240-0241