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Michael F. Clancy
53 W. Jackson Blvd., Suite 1401
Chicago, IL 60604

Re: United States v. Luis Uribe, No. 25 CR 773

Mr. Clancy:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that, at trial in the above-referenced case, it anticipates introducing expert testimony, of Rochelle Keyhan, as detailed below.

1. Expert Background

Ms. Keyhan is currently the Chief Executive Officer of Collective Liberty, an organization which she founded in approximately November 2018. Her curriculum vitae is enclosed, as well as a list of cases in which she has previously testified as an expert in depositions. Ms. Keyhan has extensive experience in the methods and operations of sex trafficking, including expertise in the nature of human sex trafficking, victim identification and support, the cycle of trafficking in America's communities, the interactions between traffickers and their victims, as well as with the public and law enforcement, policies and procedures that impact sex trafficking in businesses and the public, and the impact of effective training and anti-trafficking measures. In addition, Ms. Keyhan has expertise in methods and operation of sex trafficking organizations that utilize women of Chinese descent as workers.

Collective Liberty is a national organization focused on combatting human trafficking, including sex trafficking, through, among other things, training, and public policy strategy. The organization also manages the Human Trafficking Fusion Center, which provides intelligence analysis support regarding human trafficking activity, and expert training in the field of human trafficking. The Fusion Center also manages the largest dataset covering human trafficking organizations in the United States, a substantial percentage of which relates to Asian sex trafficking organizations. Through the Fusion Center, Ms. Keyhan has: trained over 12,000

human trafficking and financial crimes investigators on national best practices for eradicating human trafficking, including training specifically focused on Asian human trafficking organizations; directly supported over 1,000 successful human trafficking investigations; supported improved policy and approaches in hundreds of law enforcement agencies across the United States; and assisted with the improvement or passage of one hundred new human-trafficking related laws, including multiple laws that directly impact Asian human trafficking organizations. Ms. Keyhan has also provided training and advisory support to private institutions, including in the financial, transportation, and medical industries.

Ms. Keyhan received a Bachelor of Arts in English from the University of California, Los Angeles; and her Juris Doctor from Temple University. After law school, from 2010 to July 2016, Ms. Keyhan served as an Assistant District Attorney, Family Violation and Sexual Assault (FVSA) Unit, in the Philadelphia District Attorney's Office. There, she prosecuted over 20,000 cases of gender-based violence crimes in Philadelphia. This included investigating and charging human trafficking cases, including prosecuting the first two human trafficking trials in Philadelphia.

Subsequently, Ms. Keyhan served as the Director of Disruption Strategies at Polaris (formerly Polaris Project), which is a leading social justice non-profit organization combatting sex and labor trafficking. Among other projects, Polaris has assisted victims and survivors through the U.S. National Human Trafficking Hotline and through the disruptive strategies program. While at Polaris, Ms. Keyhan authored a report, entitled "Human Trafficking in Illicit Massage Businesses," which focused on sex trafficking affecting the Asian community in the United States. A copy of that report is enclosed. Ms. Keyhan also co-authored a report entitled "On-Ramps, Intersections, and Exit Routes," and advised as an expert and peer-reviewer for the Polaris report "The Typology of Modern Slavery."

Primarily as a result of her work at Polaris, Ms. Keyhan won the Thomson Reuters Stop Slavery Hero Award in 2018. She has also won additional awards, as described in her curriculum vitae.

Ms. Keyhan's expert testimony is based on multiple sources, including, but not limited to, extensive review of case files in human trafficking cases, thousands of victim and survivor interviews, data and intelligence gathered regarding human trafficking organizations, and collaboration with other experts and stakeholders. In her research, Ms. Keyhan has utilized, among other things, the following data collection methods: direct case work; victim interactions; and systemic data analysis.

2. Summary of Testimony

Ms. Keyhan's testimony will educate the jury generally about sex trafficking, and specifically, sex trafficking involving women of Chinese descent. The government anticipates that Ms. Keyhan will testify to the following areas:

a. Structure and Operation of Sex Trafficking Organizations.

Ms. Keyhan will testify regarding the structure and operation of Chinese sex trafficking organizations. These organizations are typically run by ethnically Chinese organized crime members located either in the United States or in China. Additionally, multiple individuals commonly play different roles in the organization. For instance, some individuals are responsible for recruitment of workers, whereas others may be more involved in the day-to-day operations. Sometimes, organizations utilize a manager, who is involved in operation of the organization and ensuring compliance of workers. Organizations also utilize recruited sex workers who have some managerial responsibilities, playing the role of a manager-in-training. Organizations also commonly use drivers to transport workers. Front line managers or managers-in-training typically are women, whereas men in the organization are more likely to be drivers, recruiters, or play other roles in the organization. Members of the organization are commonly decentralized, and sometimes will include outside parties to conduct certain activities on behalf of the organization.

b. Recruitment of Sex Workers. Ms. Keyhan will testify that sex trafficker networks typically recruit workers from Chinese communities, commonly in Flushing, New York, San Francisco, and Los Angeles. Workers in those areas are usually recruited through online means, including website ads, and social media (including WeChat, a social communication application commonly used by members of the Chinese community). Recruited women are transported to other locales throughout the United States, including smaller cities and towns. One of the hubs through which workers commonly travel is the Chicagoland area. As part of their paid sex work, workers often are stationed in illicit massage businesses as well as hotels, motels, and other locations. It is common for the workers never to meet the recruiters in person, or even to know their true names. It is also common for organizations to move workers around multiple cities and states. In some circumstances, recruited women are unaware that the recruiters work for a sex trafficking organization, and the recruiters exploit community or personal connections with the victims to earn their trust. Additionally, recruiters sometimes take custody of the workers' immigration documents, such as visas and passports, as a way to ensure compliance with the sex trafficking organization.

In some circumstances, recruiters misrepresent the nature of the potential employment, including stating in advertisements that the work is legitimate, non-sexual in nature, or for massage only, and often continue to make misrepresentations to potential workers during interviews or other interactions.

It is common for recruited women to have no more than a high school education, and to know very little or no English. The average age of workers is between 35-55, although organizations will recruit workers in their late 20s all the way up to their late 60s. Organizations exploit workers' financial need, as well as cultural patterns, and often target women with potential immigration vulnerabilities. For instance, it is common for workers from China to have arrived in the United States on a B-1/B-2 visa, and workers utilize expensive brokers to handle the visa process, which will commonly cause the worker to be indebted to the broker. In some circumstances, victims believed that they had valid visas due to their use of these brokers, when the brokers failed to obtain valid visas for those victims. Sex trafficking organizations exploit this financial vulnerability. In some circumstances, the visa brokers work with the sex trafficking organization, and the worker repays the debt to the broker through sex work. In other circumstances, the brokers are separate from the organization, but organizations typically know that potential workers have incurred debt to these brokers, and therefore exploit their financial need to engage them in sex work. Other sex workers may potentially lack clear status in the United States, and organizations exploit the sex workers' fear of deportation. For instance, members of the organization may tell workers that they have relationships with law enforcement (whether they do or not), as a way to threaten that non-compliance with the organization would potentially result in their deportation. Additionally, the organization may also retain workers' immigration documents. In other circumstances, organizations may sometimes refer their own workers to immigration authorities to send a message to other workers that deportation could be a potential consequence of non-compliance. Organizations also exploit these vulnerabilities to ensure that workers do not themselves report to law enforcement, as the involvement of law enforcement could potentially endanger the organization and their profits.

Additionally, recruiters also know that recent immigrants are likely to seek support from extended community networks, often centered around Chinatowns in major cities in the United States. These communities are often socially-oriented and collectivist. Recruiters tap into this cultural practice, due to the high level of trust in recommendations from these sources, and based on traditional use of relationships for professional, social, and organizational levels. These cultural patterns also create pressure for workers vis-à-vis the sex trafficking organization. For instance, certain Chinese cultural practices emphasize solidarity and empathy, as well as attributing a positive value to the obligation of reciprocation or repayment. Trafficking organizations exploit these practices by convincing workers that they have been done a favor by employing them, and that the worker should therefore work in the interest of the organization, even over the worker's self-interest.

c. Methods and operations of sex trafficking organizations.

After women are recruited to work in other locations, the trafficking organization will

commonly pay for the worker's travel and hotel expenses, including potentially booking the worker's travel and hotel (although sometimes worker books the travel and hotel themselves, and the worker will pay out of the proceeds of sex work). The organization then post advertisements on various websites, such as Backpage.com (or similar websites) or Craigslist, which are targeted at buyers. Those advertisements offer (sometimes explicitly) sexual services to potential customers in a particular geographic area, such as the Chicagoland area. Those advertisements typically include a photograph of a purported sex worker, although those are typically generic stock sexually explicit photographs, and are not a photograph of the actual sex worker. Additionally, the advertisers provide a telephone number for the customer to contact. This telephone number also is not typically held by the sex worker, but is controlled by the organization (or individuals affiliated with the organization). Individuals associated with the organization act as dispatchers, who direct customers to the location of the organization's workers. The workers commonly do not meet the dispatchers in person, and do not know their true names.

After customers are dispatched to the sex worker's location, members of the organization notify the worker regarding the details of the appointment, including potentially price and the negotiated services. These communications typically occur over communication applications such as WeChat, and typically not in English. It is uncommon for the worker to have details regarding the customer before the appointment time. Customers commonly pay the workers in cash. On a regular basis, the trafficking organization often send another person to pick up money earned by the worker. This person may be the same driver used to transport workers, or may be a different member of the organization. The organization also sometimes utilize drivers to deliver food and household goods to workers where they are staying.

It is not uncommon for managers or managers-in-training in the organization to also perform sex work in addition to their managerial responsibilities. It is also common for managers or managers-in-training to foster friendly relationships with the workers as a way to develop a sense of affinity and loyalty to the organization. This is another way in which the organization controls workers.

It is common for the organization to surveil workers, either covertly or overtly, to ensure that workers are performing sex work for the organization, and are complying with the demands of the organization. In some circumstances, this surveillance may take the form of regular check-ins with managers or other members of the organization.

It is also not uncommon for multiple sex workers in the same organization to communicate with each other over communication applications, including WeChat to discuss their day-to-day activities, and it is not uncommon for these workers to

develop friendships with other workers in the same organization. Sex trafficking organizations are sometimes involved in these group chats, but in other circumstances, the organizations are not opposed to the workers communicating amongst themselves because these relationships help foster affinity and loyalty to the organization. In some circumstances, sex workers will share information about problematic clients, including clients that victimize the workers through violence, including sexual violence, in these communications.

d. **Sexual Assault of Sex Workers.** Ms. Keyhan will testify that sex workers are sometimes physically or sexually assaulted while working for organizations. Ms. Keyhan will testify that it is uncommon for sex workers to report these incidents to law enforcement. It is also common when encountered by law enforcement for sex workers to initially deny that they were victimized. Victims are reluctant to report to law enforcement for many reasons, including fear, shame, trauma, psychological manipulation by trafficking organizations, and for cultural reasons. For instance, Chinese sex workers commonly feel a level of shame that is significantly higher than the shame seen in other types of sex trafficking organizations. One guiding principle of Chinese social interactions is the concept of *mianzi* (or face) which refers to an individual's social standing, reputation, or honor. Admission that the workers are involved in sex work can result in the individual "losing face," which is viewed as permanently damaging their relationship with their community and causing shame to the workers' family. Consequently, many Chinese sex workers are uncomfortable with using the word "sex" when describing their experiences, as doing so causes significant shame to themselves and their family. Additionally, as described above, workers commonly feel a kinship with their community including other members of the organizations, and they believe that reporting to law enforcement could potentially jeopardize those connections. Workers are also sometimes hesitant to report to law enforcement for fear of jeopardizing the employment of other workers in the organization, who they feel a friendship or kinship toward, and who are in a similar precarious financial situation.

Additionally, sex workers often experience fear of law enforcement, including fear of potential deportation, arrest and prosecution, as well as cultural and historical trauma related to government officials and law enforcement. For example, workers are aware that their information and activities could potentially be reported to law enforcement or Chinese intelligence agencies in China, which could result in adverse consequences for them and their family members still located in China. Sex trafficking organizations also take advantage of workers' experiences with police in China, which are commonly indifferent and corrupt particularly as it relates to gender-based violence. In China, many women who are subjected to such violence do not expect or receive assistance from the police. Many workers believe that U.S.-based law enforcement operates in a similar fashion.

Sex workers also are reluctant to report violence to law enforcement, because reporting could jeopardize their standing with the sex trafficking organization. Workers may fear losing their income (when they already in a precarious financial position), losing their sense of community amongst members of the organization, and losing access to housing and other services provided by the organization. Particularly because workers are recent immigrants to the United States, workers often believe that they have no access to other means to obtain income or services outside of those provided by sex trafficking organizations.

Ms. Keyhan has not participated in the investigation of the defendant. She has not reviewed case materials, and will not testify about the credibility of the victims or witnesses. Ms. Keyhan has never met the victims, nor has she viewed any statements of the victims. Ms. Keyhan will not interview the victims prior to trial. Ms. Keyhan will testify as to sex trafficking victims in general terms, not about the specific victims in this case. Ms. Keyhan will not offer opinions, but will testify to commonalities based on her experience, as set forth above.

If you believe these disclosures are not sufficient pursuant to Fed. R. Crim. P. 16, please advise us so we may further discuss this matter prior to bringing the issue before the Court. If you have any questions, please do not hesitate to contact us.

Very truly yours,

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Approved By:

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