

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI, NORTHERN DIVISION

Jane Doe (T.L.M.) v. Six Continents Hotels, Inc., Holiday Hospitality
Franchising LLC, and High Street Hotel Group LLC d/b/a Holiday
Inn Express

Doe (T.L.M.) · No. 3:24-CV-844-DPJ-LGI · Decided March 13, 2026

SUMMARY

The United States District Court for the Southern District of Mississippi considers motions to dismiss a Trafficking Victims Protection Reauthorization Act civil action against hotel franchisors and a franchisee. The court dismisses without prejudice the direct-liability claim against the franchisors and grants dismissal of abandoned claims under 18 U.S.C. § 2255 and perpetrator-liability claims, but otherwise denies the motions. The order analyzes the pleading requirements for knowledge and participation in a trafficking venture under 18 U.S.C. § 1595(a).

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Northern Division
WRITING FOR THE COURT	Daniel P. Jordan III
JURISDICTION	United States District Court for the Southern District of Mississippi, Northern Division
DECIDED	March 13, 2026
DOCKET	3:24-CV-844-DPJ-LGI
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a civil sex-trafficking action under the Trafficking Victims Protection Reauthorization Act against hotel franchisors and a franchisee. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6).
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded facts as true and views them in the light most favorable to the plaintiff, but disregards legal conclusions and conclusory recitals. The complaint must allege enough facts to state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished district-court order

PARTIES

Jane Doe (T.L.M.) v. Six Continents Hotels, Inc., Holiday Hospitality Franchising LLC, High Street Hotel Group LLC d/b/a Holiday Inn Express

TOPICS

motions to dismiss

statutory interpretation

civil procedure

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PRACTICE AREAS

civil procedure

sex trafficking

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torts

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QUESTIONS PRESENTED

1. Whether Doe plausibly pleaded beneficiary liability under 18 U.S.C. § 1595(a) against the hotel franchisee.
2. Whether Doe plausibly pleaded that the franchisee knew or should have known that the specific venture involving Doe engaged in sex trafficking in violation of the TVPRA.
3. Whether Doe plausibly pleaded participation in a venture under 18 U.S.C. § 1595(a).
4. Whether Doe plausibly pleaded direct beneficiary liability against the franchisors.
5. Whether the TVPRA permits vicarious liability and whether Doe pleaded an underlying TVPRA violation sufficient to support that theory.
6. Whether the abandoned claims under 18 U.S.C. § 2255 and the disavowed perpetrator-liability claim should be dismissed.

HOLDINGS

1. Section 1595(a) imposes a negligence-based actual-or-constructive-knowledge standard, and the plaintiff must plausibly allege that the defendant knew or should have known that the specific venture from which it benefited engaged in a TVPRA violation.
2. Doe plausibly pleaded that HSHG knew or should have known that she was being trafficked at its hotel.
3. At the pleading stage, allegations of a continuous business relationship with the trafficker, continued room rentals despite knowledge or constructive knowledge, alleged employee solicitation, and receipt of rent plausibly established that HSHG participated in a venture from which it knowingly benefited.
4. Doe failed to plausibly plead direct liability against IHG because the complaint did not allege facts showing that the franchisors received reports or otherwise had actual or constructive knowledge of the specific trafficking venture involving Doe.
5. The TVPRA permits vicarious liability, and Doe's vicarious-liability claim against IHG survived because the complaint plausibly alleged an underlying TVPRA violation by HSHG.
6. Dismissal of the direct-liability claim against IHG was without prejudice, and Doe was permitted to seek leave to amend within fourteen days.

KEY QUOTATIONS

“To overcome a Rule 12(b)(6) motion, a plaintiff must plead “enough facts to state a claim to relief that is plausible on its face.”” (at 3)

“As a result, general allegations about the nation’s sex-trafficking problem in hotels—though perhaps relevant background—will not satisfy pleading requirements.” (at 5)

“Viewed as a whole, the Complaint satisfies Federal Rule of Civil Procedure 9(b), which allows plaintiffs to plead knowledge “generally.”” (at 11)

“Both definitions require that the alleged participant have an ongoing interest in the success of a specific venture and elect to further the ends of the venture beyond what would reasonably be expected in an ordinary commercial transaction.” (at 15)

“Indirect liability is a separate consideration from beneficiary liability under the TVPRA, which is a form of direct liability.” (at 17)

FACTUAL BACKGROUND

Doe alleged that she was trafficked for sex at a Holiday Inn Express in Jackson, Mississippi, from January 2013 through December 2014. She alleged that the hotel franchisee and franchisors knew or should have known about the trafficking and financially benefited by continuing to rent rooms to her trafficker. The complaint identified alleged trafficking indicators, including cash or prepaid-card payments, repeated short-term visits by men, use of do-not-disturb signs, heavy room traffic, the trafficker's presence, and alleged solicitation by hotel personnel.

PROCEDURAL HISTORY

Doe alleged that she was trafficked for sex at a Holiday Inn Express in Jackson, Mississippi, from January 2013 through December 2014. The defendants moved to dismiss. The court dismissed without prejudice the direct-liability claim against the franchisors, allowed the vicarious-liability claim against them and the beneficiary-liability claim against the franchisee to proceed, and granted dismissal as to claims Doe had abandoned or disavowed. The court granted Doe fourteen days to seek leave to amend the franchisor direct-liability claim.

DISPOSITION

other

CASES CITED

- Martin K. Eby Constr. Co. v. Dall. Area Rapid Transit, 369 F.3d 464, 467 (5th Cir. 2004)
- Jones v. Greninger, 188 F.3d 322, 324 (5th Cir. 1999) (per curiam)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 556, 570 (2007)
- In re S. Scrap Material Co., LLC, 541 F.3d 584, 587 (5th Cir. 2008)
- Doe (E.M.B.) v. G6 Hosp., LLC, No. 9:23-CV-173-MJT-CLS, 2025 WL 2556104, at *3-4 (E.D. Tex. Feb. 3, 2025)

- G.G. v. Salesforce.com, Inc., 76 F.4th 544, 548, 555 n.9, 557-60 (7th Cir. 2023)
- E.S. v. Best W. Int'l, Inc., 510 F. Supp. 3d 420, 426 (N.D. Tex. 2021)
- J.C. v. Choice Hotels Int'l, No. 20-CV-155-WHO, 2020 WL 6318707, at *4 (N.D. Cal. Oct. 28, 2020)
- Doe #1 v. Red Roof Inns, Inc., 21 F.4th 714, 723-25 (11th Cir. 2021)
- H.G. v. Inter-Cont'l Hotels Corp., 489 F. Supp. 3d 697, 704 (E.D. Mich. 2020)
- M.A. v. Wyndham Hotels & Resorts, Inc., 425 F. Supp. 3d 959, 964, 970-71 (S.D. Ohio 2019)
- S.J. v. Choice Hotels Int'l, Inc., 473 F. Supp. 3d 147, 154 (E.D.N.Y. 2020)
- Salesforce.com, Inc., 2024 WL 1337370, at *11-17 (N.D. Tex. Mar. 28, 2024)
- Lundstrom v. Choice Hotels Int'l, No. 21-CV-619-PAB-SKC, 2021 WL 5579117, at *1-2, *6-8 (D. Colo. Nov. 30, 2021)
- B.M. v. Wyndham Hotels & Resorts, No. 20-CV-656-BLF, 2020 WL 4368214, at *5-6 (N.D. Cal. July 30, 2020)
- Doe v. Hyatt Corp., No. 3:24-CV-1229-N, 2025 WL 1953857, at *3, *5 (N.D. Tex. July 15, 2025)
- J.B. v. G6 Hosp., LLC, No. 19-CV-7848-HSG, 2020 WL 4901196, at *10 (N.D. Cal. Aug. 20, 2020)
- Doe v. G6 Hosp., LLC, No. 3:25-CV-770-D, 2025 WL 2697832, at *6-8 (N.D. Tex. Sept. 22, 2025)
- Doe (T.M.) v. G6 Hosp. LLC, No. 1:23-CV-2598-MLB, 2024 WL 4457563, at *7 (N.D. Ga. Sept. 23, 2024)
- K.E.C. v. G6 Hosp., LLC, 750 F. Supp. 3d 719, 729, 731-39 (E.D. Tex. 2024)
- Doe 1 v. Apple Inc., 96 F.4th 403, 414-16 & n.5 (D.C. Cir. 2024)
- Law v. Siegel, 571 U.S. 415, 422 (2014)
- A.B. v. Salesforce, Inc., 123 F.4th 788, 797 (5th Cir. 2024)
- K.H. v. Riti, No. 23-11682, 2024 WL 505063, at *2-4 (11th Cir. Feb. 9, 2024)
- Lagos v. United States, 584 U.S. 577, 582 (2018)
- Hart v. Bayer Corp., 199 F.3d 239, 248 n.6 (5th Cir. 2000)