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IN THE SECOND JUDICIAL DISTRICT COURT
IN AND FOR WEBER COUNTY, STATE OF UTAH

<p>STATE OF UTAH, Plaintiff, vs. JORDAN NATHANIEL JENSEN DOB: 03/11/1990, Defendant.</p>	<p>INFORMATION AND REQUEST FOR ARREST WARRANT CUSTODY STATUS: IN CUSTODY AT WEBER COUNTY JAIL AG Case No. 2021-372 Case No.: Judge:</p>
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The undersigned, Special Agent Caio Jesuino, of the Utah Attorney General’s Office SECURE Task Force, states on information and belief that the above-listed defendant, **JORDAN NATHANIEL JENSEN**, committed the following crimes:

COUNT 1: HUMAN TRAFFICKING FOR LABOR EXPLOITATION, Utah Code Annotated §76-5-308, a Second-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN recruited, harbored, transported, or obtained a person through the use of force, fraud, or coercion by means of (a) threatening serious harm to, or physical restraint against, that person or a third person; (b) destroying, concealing, removing, confiscating, or possessing any passport, immigration document, or other government-issued identification document; (c) abusing or threatening abuse of the law or legal process against the person or a third person; (d) using a condition of a person being a debtor due to a pledge of the debtor's personal services or the personal services of a person under the control of the debtor as a security for debt where the reasonable value of the services is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined; (e) using a condition of servitude by means of any scheme, plan, or pattern intended to cause a person to believe that if

the person did not enter into or continue in a condition of servitude, that person or a third person would suffer serious harm or physical restraint, or would be threatened with abuse of legal process; and/or (f) creating or exploiting a relationship where the person is dependent on the actor, to wit: the defendant recruited, harbored, transported, or obtained J.V. into forced labor exploitation, through force, fraud, or coercion.

COUNT 2: HUMAN TRAFFICKING FOR LABOR EXPLOITATION, Utah Code Annotated §76-5-308, a Second-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN recruited, harbored, transported, or obtained a person through the use of force, fraud, or coercion by means of (a) threatening serious harm to, or physical restraint against, that person or a third person; (b) destroying, concealing, removing, confiscating, or possessing any passport, immigration document, or other government-issued identification document; (c) abusing or threatening abuse of the law or legal process against the person or a third person; (d) using a condition of a person being a debtor due to a pledge of the debtor's personal services or the personal services of a person under the control of the debtor as a security for debt where the reasonable value of the services is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined; (e) using a condition of servitude by means of any scheme, plan, or pattern intended to cause a person to believe that if the person did not enter into or continue in a condition of servitude, that person or a third person would suffer serious harm or physical restraint, or would be threatened with abuse of legal process; and/or (f) creating or exploiting a relationship where the person is dependent on the actor, to wit: the defendant recruited, harbored, transported, or obtained J.R. into forced labor exploitation, through force, fraud, or coercion.

COUNT 3: HUMAN TRAFFICKING FOR LABOR EXPLOITATION, Utah Code Annotated §76-5-308, a Second-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN recruited, harbored, transported, or obtained a person through the use of force, fraud, or coercion by means of (a) threatening serious harm to, or physical restraint against, that person or a third person; (b) destroying, concealing, removing, confiscating, or possessing any passport, immigration document, or other government-issued identification document; (c) abusing or threatening abuse of the law or legal process against the person or a third person; (d) using a condition of a person being a debtor due to a pledge of the debtor's personal services or the personal services of a person under the control of the debtor as a security for debt where the reasonable value of the services is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined; (e) using a condition of servitude by means of any scheme, plan, or pattern intended to cause a person to believe that if the person did not enter into or continue in a condition of servitude, that person or a third person would suffer serious harm or physical restraint, or would be threatened with abuse of legal process; and/or (f) creating or exploiting a relationship where the person is dependent on the actor, to wit: the defendant recruited, harbored, transported, or obtained A.C. into forced labor exploitation, through force, fraud, or coercion.

COUNT 4: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On

or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of J.V.

COUNT 5: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of J.R.

COUNT 6: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of T.C.

COUNT 7: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in

obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of A.G.

COUNT 8: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of L.G.

COUNT 9: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of R.S.

COUNT 10: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of A.M.

COUNT 11: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of J.M

COUNT 12: UNLAWFUL POSSESSION OF ANOTHER'S IDENTIFICATION

DOCUMENTS, Utah Code Annotated §76-6-1105(2)(b), a Third-Degree Felony, as follows: On or about and between April 2021 and July 2021, in the State of Utah, wherein the defendant, JORDAN NATHANIEL JENSEN, did, under circumstances that do not constitute a violation of Section 76-6-1102, (i) obtain or possess identifying documents of more than two, but fewer than 100, individuals (a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive; or (ii) assisted another person in obtaining or possessing identifying documents of more than two, but fewer than 100, individuals(a) with knowledge that the individual is not entitled to obtain or possess the identifying documents; or (b) with intent to defraud or deceive. To wit, the visa and/or passport of C.M.

PROBABLE CAUSE STATEMENT AND REQUEST FOR ARREST WARRANT:

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: Special Agent Caio Jesuino, Utah Attorney General's Office, SECURE Task Force.

On or about 29th day of June 2021, The Utah Attorney General's Office received information regarding a possible Labor Trafficking case in Ogden, UT. The information came by way of the Mexican Consulate, which is located in Salt Lake City, UT.

That same day, Special Agent Caio Jesuino of the Utah Attorney General's SECURE Task Force interviewed two individuals: They were identified as J.V. and J.L., non-English speakers. The victims were interviewed separately. These victims also reported there are currently other victims experiencing the same exploitation.

J.V. and J.L. both independently reported they were hired by a company named Midway West Amusement while they were living in their home country of Mexico. The company is a traveling carnival entertainment company. According to public records, and victim's statements, the company is owned and operated by Michelle M Jensen (1/31/1965), Jordan Nathaniel Jensen (03/11/1990), and Hunter Austin Jensen (05/11/1997). An Arizona driver license was found for

each. Midway West Amusement arranged the acquisition of work visas with the United States government for J.L. and J.V. prior their arrival in the U.S. They were issued a temporarily work visa (H2B Visa), which is a program for seasonal foreign workers.

In April or May 2021, J.V. and J.L. arrived in the U.S. and started employment with Midway West Amusement under the H2B program. J.V.'s job description was to help setup stands and ensure their proper operation. J.L.'s job description was to drive the trucks across states and help to operate heavy machinery. They were hired to work normal hours for \$400.00 per week.

J.V. and J.L. reported that JORDAN NATHANIEL JENSEN as agent of Midway West Amusement confiscated their passports sometime after their arrival. These passports also contained their visas. J.L. and J.V. reported that they believed this to be a common practice. After speaking with others J.V. and J.L. learned that Midway West Amusement possessed all passports and visas for their foreign workers under the H2B program and stored them inside of their office. Some were collected when they started working within the company, others a little later. J.V. reported that JORDAN NATHANIEL JENSEN explained to him he kept their passports because he did not want anyone to escape. JORDAN NATHANIEL JENSEN also told J.V. that he (JORDAN NATHANIEL JENSEN) had the right to keep the passports according to a contract his company had signed with the U.S. government. J.V. and J.L. reported that all Midway West Amusement employees are foreign nationals, with H2B visas. J.V. reported that JORDAN NATHANIEL JENSEN stated they preferred foreign workers and avoided hiring American workers.

Immediately after the start of their employment, J.V. and J.L. stated they worked extremely long hours (approximately 70 hours a week) without water or meal breaks. They lived in a confined space inside of mobile trailer without running water, electricity, or air conditioning. Some of the trailers contained a bed, some did not. J.V. and J.L. reported they had no kitchen to cook a meal. Both victims reported they were not allowed to leave their working area. Many times the owners of the business would not give them water or allow them to take a water break for an entire shift, and by the end of a shift they were extremely hungry and thirsty.

J.V. and J.L. reported that the owners, in particular JORDAN NATHANIEL JENSEN, would constantly threaten to send them back to Mexico if they did not perform their job well and without complaint. J.V. and J.L. reported they were subjected to hostile working conditions and worked under duress. J.V. and J.L. felt they could not complain to any authority without fear of reprisal.

J.V. and J.L. reported they spoke with JORDAN NATHANIEL JENSEN and informed him of their desire to leave. J.V. and J.L. asked for their last week's pay and return of their passports. They reported that JORDAN NATHANIEL JENSEN ridiculed them, stating he (JORDAN NATHANIEL JENSEN) would not pay them or give them their passports until they were back in Mexico. J.V. and J.L. left without pay and without their passports/visas. The next day, they contacted the Mexican Consulate and reported the incident. The Mexican Consulate contacted AAU, who reported the incident to the Utah Attorney General's Office.

On June 30, 2021, J.V., equipped with audio and video recording devices returned to the staging area of Midway West Amusement, located at 3651 Wall Ave. Ogden, UT, also known as the Newgate Mall. Upon arrival at the current location of Midway West Amusement, J.V. approached a black truck, bearing the Arizona license plate BYZ2176 registered to JORDAN NATHANIEL JENSEN from Gilbert, AZ, entering the parking lot near the staging area. The driver of the vehicle, identified as JORDAN NATHANIEL JENSEN, then engaged in conversation with J.V.

Shortly after, Agents observed a second male joined the conversation. This male was later identified as "Victor" and acted as a translator between J.V. and JORDAN NATHANIEL JENSEN.

J.V. asked JORDAN NATHANIEL JENSEN for his last week's pay and JORDAN NATHANIEL JENSEN refused to give the payment. J.V. then asked JORDAN NATHANIEL JENSEN for return of his passport and visa. JORDAN NATHANIEL JENSEN refused. JORDAN NATHANIEL JENSEN then advised J.V. that since he (J.V.) left his employment, he would not give his passport back nor pay him for hours already worked. JORDAN NATHANIEL JENSEN instead told J.V. he would buy him a plane ticket back to Mexico. Jordan Jensen stated that once J.V. had boarded the plane then he would give him his passport back.

After the operation was concluded, J.V. returned to speak with agents. J.V. received a call from "Victor" (the individual previously acting as translator). "Victor" reported that his documents were also being kept by JORDAN NATHANIEL JENSEN. On June 30 2021, the Utah Attorney General's Office also received a tip regarding a possible human trafficking offense. The tip came from the national human trafficking hotline. The tip reported that two people with the names of Jordan Jensen and Michelle Jensen were exploiting approximately 15 foreign workers. The tip also reported the traffickers were operating a business at the Newgate Mall in Ogden. This information corroborates the information provided by J.V. and J.L.

On July 01, 2021, Agents staged to execute a search warrant on the mobile office/trailer of Midway West Amusement. Upon arrival at the location of the mobile office/trailer, agents observed Hunter Jensen hurriedly returning passports/visas to workers. Agents executed the search warrant and located 9 separate visas/passports, including passport/visas belonging to J.L. and J.V. Agents spoke with Hunter Jensen who informed them JORDAN NATHANIEL JENSEN had instructed him to return the passports/visas just that day. Agents spoke with another individual on scene during the execution of the search warrant. A.C. A.C. indicated to agents that he had an experience similar to that of J.V. and J.L. A.C. indicated he attempted to obtain return of his passport from JORDAN NATHANIEL JENSEN several days before, but JORDAN NATHANIEL JENSEN declined to return his passport. A.C. reported he had received his passport from Hunter Jensen that morning as Agents were arriving to execute the search warrant.

Pursuant to 77-20-1(2), a no-bail warrant is requested in this matter. There is substantial evidence to support the current charge. In addition, JENSEN presents a clear danger to the public given the volume of offenses, the nature of the offenses, and the number of victims involved. JENSEN lives a transient existence with Midway West Amusement and travels the country throughout a large portion of the year. JENSEN, in his position with Midway West Amusement,

has access to numerous other potential victims. JENSEN has no known ties to the State of Utah and is likely to flee the jurisdiction should he be released. In addition, the Utah Attorney General's Office is actively investigating the matter for other potential victims. Therefore, a no-bail warrant is necessary to secure the appearance of the accused and to protect the community.

Pursuant to Utah Code Ann., §78B-18a-106 (2018) I declare, under criminal penalty under the law of Utah, that the foregoing is true and correct.

DATED this 2nd day of July 2021.

/s/ Caio Jesuino
SPECIAL AGENT CAIO JESUINO
UTAH ATTORNEY GENERAL'S OFFICE
SECURE TASK FORCE

AUTHORIZED for presentment and filing this 2nd day of July, 2021.

SEAN D. REYES
ATTORNEY GENERAL

/s/Kaytlin V. Beckett
Assistant Utah Attorney General