

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN,
And AMANDA NASH, on behalf of
themselves and all similarly situated
persons,

Case No. 2:20-CV-215-SWS

(U.S. District Judge Scott W. Skavdahl)

PLAINTIFFS,)

v.)

TRINITY TEEN SOLUTIONS, INC., a)
Wyoming corporation; ANGELA C.)
WOODWARD; JERRY D.)
WOODWARD; KARA WOODWARD,)
KYLE WOODWARD; and DALLY-UP,)
LLC. A Wyoming limited liability)
company,)

DEFENDANTS.)

NOTICE OF A CERTIFIED CLASS ACTION

**IF YOU RECEIVED TREATMENT AT TRINITY TEEN SOLUTIONS, INC. LOCATED
IN POWELL, WYOMING FROM NOVEMBER 27, 2010 UNTIL ITS CLOSURE AND
YOU WERE FORCED TO PERFORM AGRICULTURAL OR MANUAL LABOR
WITHOUT PAY, YOU ARE A MEMBER OF A CLASS ACTION LAWSUIT (“CLASS
MEMBER”)**

**PLEASE READ THIS NOTICE OF CERTIFICATION OF A CLASS ACTION
CAREFULLY BECAUSE YOUR LEGAL RIGHTS WILL BE AFFECTED.**

The purpose of this Notice (“Notice”) is to inform you:

- A lawsuit called *Carlie Sherman, Anna Gozun, and Amanda Nash, on behalf of themselves and all similarly situated persons, v. Trinity Teen Solutions, Inc., a Wyoming corporation; Angela C. Woodward; Jerry D. Woodward; Kara Woodard, Kyle Woodward; and Dally-Up, LLC, a Wyoming Limited Liability Company*, Docket No. 2:20-CV-215-SWS is currently pending in the United States District Court for the District of Wyoming before the Hon. U.S. District Court Judge Scott W. Skavdahl. (“the Lawsuit”);

- Judge Skavdahl has certified the Lawsuit as a “Class Action” under the Federal Rules of Civil Procedure, and, as such, the claims and rights of those individuals who are Members of the certified Class will be affected;
- The “Class Period” is November 27, 2010 through the present; and Members of the Class can obtain more information about the Lawsuit if they desire to do so and they can choose to be excluded from participating in the Lawsuit.

1. Description of the Lawsuit:

The named plaintiffs in the above styled lawsuit filed a class action complaint against all the defendants listed at the top of this Notice. These plaintiffs and all Class Members were female minors that were sent by their parents to the Trinity Teen working ranch (“Trinity ranch”) in northern Wyoming where they were supposed to receive various forms of traditional and cutting-edge therapy and schooling to address their misbehavior. Plaintiffs and Class Members allege that the Defendants failed to provide education and therapy, and instead largely forced the teenagers to perform labor for many hours per day under horrible conditions. They allege each Defendant was either directly involved with or knowingly benefitted from the forced labor. Plaintiffs and Class Members assert three federal causes of action under the Trafficking Victims Protection Reauthorization Act (TVPRA) for: (1) knowingly providing or obtaining unlawful forced labor under 18 U.S.C. § 1589(a), (2) knowingly benefitting from unlawful forced labor under 18 U.S.C. § 1589(b), and (3) knowingly trafficking a person for unlawful forced labor under 18 U.S.C. § 1590(a).

The Lawsuit seeks money damages for the above-described misconduct and violations of federal law. All of the Defendants have denied that they did anything illegal or wrong. The Court has not yet ruled who will win the Lawsuit. However, the Court has ruled that the case is the type of case that should proceed forward as a Class Action and that the matter is ready to be tried to a jury as a Class Action in Judge Skavdahl’s courtroom located at 111 South Wolcott, Caper, Wyoming starting **at 9:00 a.m. on March 17, 2025.**

2. Who are the Defendants in the Lawsuit?

The Lawsuit has been certified and is pending against the following Defendants:

Trinity Teen Solutions, Inc.	Angela C. Woodward
Jerry D. Woodward	Kara Woodward
Kyle Woodward	Dally-Up, LLC

3. Who are the Plaintiffs that are part of this Lawsuit?

Judge Skavdahl certified the following class of Plaintiffs in the Lawsuit:

From November 27, 2010, to the present, Plaintiffs, and all similarly situated

persons who received treatment from Defendant Trinity Teen Solutions, Inc. and were subject to the provision of "agricultural labor" (as defined [in] 26 CFR § 3 1.3121(g)(l)) or any other manual labor to one or more of the Defendants without payment for said labor.

The definition of "agricultural labor" in 26 CFR § 3 1.3121(g)(l) means all service performed "on a farm, in the employ of any person, in connection with cultivating the soil, or in connection with raising or harvesting any agricultural or horticultural commodity, including the raising, shearing, feeding, caring for, training, and management of livestock, bees, poultry, and fur-bearing animals and wildlife." The Plaintiffs in the Lawsuit contend that all the Class Members were forced to perform these type services on the Trinity ranch.

4. What is a "Class Action"?

A "Class Action" is a lawsuit in which an individual plaintiff(s) desires to represent a group of people so that the group's claims can be decided in one legal proceeding. In the Lawsuit, Judge Skavdahl has determined that this is the type of case that is suitable for "class" treatment and has "certified" the Lawsuit as a Class Action. This means that the named plaintiffs, Carlie Sherman, Anna Gozun and Amanda Nash, are authorized to continue to prosecute the Lawsuit on behalf of all the minor girls that who meet the definition described above. If you wish to be a part of this Lawsuit, you do not have to do anything further and your rights will be protected in the Lawsuit.

5. What type of damages might Class Members obtain in this Class Action?

The Defendants have internal records that demonstrate periods of resident presence and what they did during their time at Trinity from November 27, 2010 until the Defendants stopped operating Trinity ranch. This is known as the "Class Period." The Plaintiffs intend to offer this type evidence and expert testimony at trial to establish the total amount of money that each Class Member should have been paid for their forced labor at Trinity ranch during the Class Period. As a result, if the Plaintiffs are successful at trial (or reach a settlement before or during trial) then all Class Members that remain in the case until the end, will be able to share in any monetary award achieved in this case and you do not have to do anything (or even participate at trial) to share in any such monetary award related to these unpaid wages.

6. Can we recover individual damages in this Class Action?

The Court has also ruled that individual Class Members might pursue emotional distress type damages related to your stay at Trinity ranch in this case. However, these types of damages are individualized and would require you to come to trial and present evidence of how you were harmed or emotionally damaged by the Defendants' unlawful conduct. If you wish to pursue these individual damages, **it is very important** that you contact Class Counsel below to discuss these issues with them. Alternatively, you can hire your own lawyer, at your own expense, to pursue these types of damages for you. If you do nothing, you will only be allowed to participate in a monetary award related to the unpaid wages described above and will not be able to recover (or ever sue the Defendants for) emotional damages or injury.

7. What if I do not want to be a part of this Class Action?

The Judge handling this Lawsuit has given all Class Members the ability to “opt out” or exclude themselves from being a part of this Class Action. However, you should know that, if you choose to “opt out” of this case and the Plaintiffs are successful at trial (or settle this Lawsuit before or during trial), you **will not** benefit from any monetary recovery had in this case but you **will not be bound** by any verdict or settlement reached in this case. If you “opt out” of this case, you are free to pursue your own individual claim against the Defendants, at your own expense or you can simply do nothing. If you choose to “opt out” of this case and pursue your own individual case, **it is very important** that you immediately seek your own legal counsel because the time period allowed for bringing an individual claim will start to run from the date that you “opt out” of this case. If you wait too long, your individual claims might be deemed time barred and you would then not be able to receive any type of monetary award. The lawyers named as Class Counsel below cannot represent any individual that excludes themselves from the case.

8. How do I “opt out” or exclude myself from this Class Action?

If you do not wish to participate in the Lawsuit, you may exclude yourself from the case by mailing in a request to be excluded to: **CMM SETTLEMENT SOLUTIONS, P.O. Box 17233, Memphis, Tennessee 38187, by August 19, 2024**. The request does not have to be in any specific form but it should clearly identify the name of the person wishing to be excluded, provide your contact information and detail the time period that you stayed at the Trinity ranch. An example of a request for exclusion can be found at website www.trinityranchclassaction.com

9. Who are the Attorneys Representing Class Members?

The Court has appointed the following attorneys as Class Counsel. These Attorneys represent Carlie Sherman, Anna Gozun, and Amanda Nash and all other Class Members:

Frank L. Watson, III, Esq.
William E. Routt, III, Esq.
WATSON BURNS, PLLC
5865 Ridgeway Center Parkway
Suite 300
Memphis, Tennessee 38120
(901) 529-7996

Melissa J. Stewart, Esq.
Craig A. Edgington, Esq.
Bryce W. Ashby, Esq.
DONATI LAW, PLLC
1545 Union Avenue
Memphis, Tennessee 38104
(901) 209-5500

Michael B. Rosenthal, Esq.
Nathan Nicholas, Esq.
HATHAWAY & KUNZ, PLLC
2515 Warren Avenue
Suite 1208
Cheyenne, Wyoming 82003
(307) 634-7723

However, you do not have to be represented by the lawyers appointed as Class Counsel listed above. You have the right to retain your own attorney, have that attorney file a notice of appearance in the case, and have that attorney individually represent you and your interests in this matter.

10. Where Can I Get More Information About the Lawsuit?

If you have any questions about the Lawsuit or any portion of this Notice, you may call the Notice Administrator at 1-888-415-8886, any of the Class Counsel lawyers, or you may visit www.trinityranchclassaction.com where you may view court documents and other pertinent materials and obtain updates about the case.

**PLEASE DO NOT CALL OR WRITE THE COURT, THE CLERK'S
OFFICE, OR ANY DEFENDANT ABOUT THIS NOTICE**

Para un formulario de reclamo en Español, por favor llame al 1-888-415-8886 o visite nuestro website www.trinityranchclassaction.com