

NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-1975

UNITED STATES OF AMERICA,

v.

BOLAJI BOLARINWA,
Appellant

On Appeal from the United States District Court
for the District of New Jersey
(D.C. No. 1:22-cr-00123-001)
District Judge: Honorable Karen M. Williams

Submitted Under Third Circuit L.A.R. 34.1(a)
on September 17, 2026

Before: HARDIMAN, BIBAS, and RENDELL, *Circuit Judges*

(Filed: September 18, 2026)

OPINION*

* This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

HARDIMAN, *Circuit Judge*.

Bolaji Bolarinwa appeals her convictions for forced labor, harboring illegal aliens for financial gain, and document servitude. We will affirm.

I

Bolarinwa was charged with two counts of forced labor, in violation of 18 U.S.C. § 1589(a); two counts of harboring certain aliens for financial gain, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii); and two counts of unlawful conduct with respect to documents in furtherance of forced labor, in violation of 18 U.S.C. § 1592.

The case proceeded to trial which—viewing the record in the light most favorable to the Government as we must, *United States v. Rivera*, 74 F.4th 134, 137 (3d Cir. 2023)—established the following essential facts. Bolarinwa, a United States citizen born in Nigeria, wanted help with childcare and housework. So she recruited Bunmi, a friend of a friend, and Titi, her niece, to leave Nigeria for New Jersey. Bunmi was to provide childcare services for three months and receive about \$500 per month. But Bolarinwa told the U.S. State Department a different story. She signed a visa invitation letter for Bunmi to obtain a tourist visa in which she stated that Bunmi would stay for only a “three-week holiday[.]” App. 333. When Bunmi arrived on a six-month tourist visa, Bolarinwa took her passport. For almost a year, Bolarinwa coerced Bunmi to work around the clock cooking, cleaning, and caring for her children.

Bolarinwa recruited Titi by convincing her that she should attend college in the United States. Bolarinwa helped Titi obtain a student visa, and Titi was accepted into a university in Florida. Upon her arrival, Bolarinwa also took Titi’s passport. Rather than

allow Titi to attend the university in Florida, as Titi had been expecting, Bolarinwa had Titi stay in New Jersey, paid for her to attend a community college there, and forced her to work in the house when she was not in class.

As a condition of their visas, Titi and Bunmi were not permitted to work. Bolarinwa knew that Bunmi and Titi were out of status, but at no point did she attempt to adjust their immigration statuses so they could remain in the United States legally. Rather, she instructed Bunmi and Titi not to speak with anyone about their visa status or their living conditions.

In addition to confiscating their passports, Bolarinwa monitored Titi and Bunmi through cameras installed throughout the house, so Titi and Bunmi thought they were being watched. Bolarinwa also verbally abused them, and Titi testified that she felt that she “d[id]n’t deserve to be [alive],” App. 969, was “good for nothing,” App. 968, and was “scared of the things that would happen if [she said] no,” App. 944. Bolarinwa threatened to kill Bunmi and her adult daughter. And Bolarinwa beat Titi with shoes, an electrical wire, and a traditional Nigerian broom. Titi eventually sought help from a professor at her college, who reported Bolarinwa to the FBI.

After the Government rested its case, Bolarinwa moved for a judgment of acquittal under Federal Rule of Criminal Procedure 29. The District Court denied Bolarinwa’s motion. The jury then convicted Bolarinwa of two counts of forced labor, two counts of document servitude, and alien harboring as to Titi but not Bunmi. Following trial, Bolarinwa renewed her motion for a judgment of acquittal, which the Court denied. Bolarinwa timely appealed.

II¹

Bolarinwa raises four challenges to her convictions. As we explain, Bolarinwa did not “raise adequate contemporaneous objections to the alleged errors” below, so we will review for plain error. *United States v. Girard*, 177 F.4th 251, 256 (3d Cir. 2026). Under that standard, we will vacate Bolarinwa’s convictions “only if the errors (if any) were plain, affected substantial rights, and seriously affected the fairness, integrity or public reputation of judicial proceedings.” *Id.* (citation modified). None of her challenges succeed.

Bolarinwa first argues that her Confrontation Clause rights were violated because the District Court did not permit her to cross-examine Titi on possible bias towards the prosecution arising from an alleged shoplifting incident. But it is unlikely that a reasonable jury would have “reached a significantly different impression” of Titi’s credibility had it heard testimony on this subject. *United States v. Noel*, 905 F.3d 258, 268 (3d Cir. 2018) (citation modified). So Bolarinwa cannot show that the District Court erred in precluding questions about the alleged shoplifting incident, much less plainly erred.

Several weeks before trial, Titi was caught allegedly shoplifting about \$300 of merchandise from a New Jersey mall. At the time of trial, Titi had not been arrested or charged for the incident. The Government successfully moved to bar any questions about

¹ We have jurisdiction under 28 U.S.C. § 1291. The District Court had jurisdiction under 18 U.S.C. § 3231.

the incident. In response, Bolarinwa argued that cross-examination about the incident was proper to explore any bias Titi might have on the theory that if she cooperated with the federal prosecution, the state charges would not be pursued. But Bolarinwa never raised her *constitutional* objection with the District Court. Because Bolarinwa did not present her argument “squarely,” we review for plain error. *See Girard*, 177 F.4th at 256; *see also United States v. Moreno*, 809 F.3d 766, 773 n.3 (3d Cir. 2016) (unpreserved Confrontation Clause challenges are reviewed for plain error).

And as hinted, it is unlikely a reasonable jury’s impression of Titi’s credibility would have changed had it been apprised of the shoplifting incident because Bolarinwa’s counsel already explored Titi’s potential for bias. The jury heard that the FBI applied for Continued Presence (CP) status to allow Titi to remain in the United States while she assisted with the investigation, and that this status was conditioned on her cooperation with the investigation. The jury also heard that the FBI agent certified Titi’s application for a more permanent Trafficking (T) visa, which she received before trial. And Bolarinwa’s counsel asked her about any other benefits she may have received, like tuition or healthcare, from her cooperation and testimony. That information allowed the jury to make “a discriminating appraisal of” Titi’s “possible biases and motivation.” *Noel*, 905 F.3d at 268 (citation modified).

Bolarinwa suggests the shoplifting incident was a key source of Titi’s bias because a state conviction might jeopardize her pending T visa renewal application, which she submitted a year before she testified at trial, and Titi might have thought that she could protect herself by currying favor with federal prosecutors. But Titi testified about her

renewal application, so the jury was already able to factor in that she might slant her testimony to stay in the Government’s good graces and thereby get her pending application approved.²

Second, Bolarinwa contends that the Government failed to prove that she acted with the requisite scienter to be convicted of forced labor as to Titi under 18 U.S.C. § 1589(a). We review for plain error here too because Bolarinwa did not make that argument when she challenged her conviction under Rule 29. *See United States v. Abrams*, 165 F.4th 784, 792 (3d Cir. 2026) (“[A] bare, non-specific Rule 29 motion does not preserve every later-articulated sufficiency argument.”). All she argued in her three-page brief was that requiring “chores” does not “amount to any type of abuse that in turn would be considered a federal crime.” App. 45–46.

As § 1589(a) requires, Bolarinwa knew that she was “obtain[ing]” labor from Titi through prohibited means, including force and threats. She helped Titi obtain a student visa, knowing it prohibited Titi from working. Once Titi arrived, Bolarinwa seized her passport and required Titi to work long hours, which Titi did under duress. Bolarinwa’s

² Additionally, any error, even if plain, did not affect Bolarinwa’s substantial rights. *See United States v. Williams*, 974 F.3d 320, 341 (3d Cir. 2020). Titi’s cross-examination covered a wide variety of inquiries into her potential bias, such as a lie she told student visa authorities about the funding of her education and an allegation that she cheated on a college placement exam. Further, the Government presented significant evidence against Bolarinwa. Other testimony verified Titi came to the United States on a student visa; testimony from Bunmi detailed the abuse Titi suffered; as did testimony from witnesses who observed Titi’s injuries after she was beaten, testimony from the police officer who observed Titi’s injuries; and testimony from witnesses who corroborated the steps Titi took to get help.

insults were so severe that they made Titi feel like she was “nobody” and did not deserve to live. App. 969–70. Finally, Bolarinwa beat Titi if she broke her rules, and these beatings, combined with Bolarinwa’s other conduct, made Titi afraid of what would happen if she did not obey Bolarinwa. In sum, there was sufficient evidence for the jury to conclude that Bolarinwa acted with the requisite intent to make Titi afraid of refusing to work.

Relatedly, Bolarinwa argues that the evidence was insufficient to convict her of document servitude as to Titi under 18 U.S.C. § 1592. To sustain that conviction, she says that the Government needed to prove the forced labor offense, which she characterizes as a “predicate offense.” Bolarinwa Br. 39–40; Reply Br. 18. But as explained, the Government did obtain a valid forced labor conviction. So this unpreserved argument also fails.

Fourth, Bolarinwa argues that there was insufficient evidence for the jury to find that she harbored Bunmi for financial gain under 8 U.S.C. § 1324(a)(1)(A)(iii). Specifically, she claims that the evidence did not show that she tried to reduce the likelihood the Government would discover Bunmi. She concedes plain-error review applies here.

Recall again the record. Bolarinwa took and kept Bunmi’s passport. She surveilled Bunmi’s actions on camera. Bunmi testified that she did not feel comfortable talking to others when in public with Bolarinwa. Bolarinwa withheld the pay she promised because she did not want Bunmi to run away. When Bunmi confronted Bolarinwa about leaving, Bolarinwa threatened her and her daughter.

To sustain a conviction under § 1324, the Government must prove “conduct tending to substantially facilitate an alien’s remaining in the United States illegally and to prevent government authorities from detecting the alien’s unlawful presence.” *United States v. Ozcelik*, 527 F.3d 88, 100 (3d Cir. 2008) (citation modified). Both Bolarinwa and the Government point to case law with quite different facts than those presented here. But the error cannot be “plain” where it is not “clear under current law.” *United States v. Olano*, 507 U.S. 725, 734 (1993) (noting that “[p]lain’ is synonymous with ‘clear,’ or equivalently, ‘obvious’”). While “lack of precedent alone will not prevent us from finding plain error,” *United States v. Stinson*, 734 F.3d 180, 184 (3d Cir. 2013), “novel questions still must be capable of measurement against some other absolutely clear legal norm.” *United States v. Jabateh*, 974 F.3d 281, 299 (3d Cir. 2020) (citation modified). The facts of this case are unique and cannot be measured against some clear legal norm. Accordingly, Bolarinwa’s challenge cannot make out an error that is plain, and thus must fail.³

* * *

For the stated reasons, we will affirm Bolarinwa’s judgment of conviction.

³ Because this challenge fails under the second *Olano* prong, we need not address what harboring requires under 8 U.S.C. § 1324(a)(1)(A)(iii) or the other prongs.