
Cahill Secures Unanimous Second Circuit Affirmance of TVPRA Dismissal for Deutsche Bank

Date: 08/03/26

Cahill secured a significant victory for Deutsche Bank, obtaining a unanimous affirmance from the United States Court of Appeals for the Second Circuit of the complete dismissal of claims brought under the Trafficking Victims Protection Reauthorization Act ("TVPRA"). The plaintiffs alleged that Deutsche Bank participated in a venture with ISIS and its affiliates by providing banking services to al-Qaeda-affiliated fundraisers in Europe and ISIS-controlled banks in Iraq.

On August 3, 2026, in *Mueller v. Deutsche Bank Aktiengesellschaft*, No. 25-1162, a panel of the Second Circuit (Judges Chin, Sullivan, and Nathan) affirmed the district court's dismissal of all claims. In an issue of first impression, the Court held that "participation in a venture" under Section 1595(a) requires a showing that the defendant took part in a shared enterprise involving risk or potential gain—not merely that it provided services the venture needed. The Court found that Deutsche Bank's conduct amounted to routine, non-differentiated financial services provided at arm's length, with no common purpose, operational control, or financial interest in the alleged trafficking venture. The Court further rejected the plaintiffs' argument that the broader definitions from the criminal trafficking statute (Section 1591(e)) should apply to civil claims under Section 1595(a).

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