Communication from Public

Name: Sunita Jain Anti-Trafficking Initiative, Loyola Law School
Date Submitted: 06/30/2026 12:08 PM
Council File No: 15-0989-S65
Comments for Public Posting: June 30, 2026 Dear Los Angeles Councilmembers, On behalf of the Sunita Jain Anti Trafficking Initiative at Loyola Law School, we submit this letter urging the Council not to sign the ESRA until dedicated funding for human rights and trafficking prevention efforts is guaranteed. Since December 2025, advocates, workers, and lived experience experts have repeatedly raised concerns about the absence of a meaningful human rights plan for the 2028 Olympic Games. In December, SJI submitted a detailed proposal requesting $3.1 million in human rights funding — a reasonable, evidence based target grounded in what local experts told LA28 directly when LA28 invited them to consult in October 2025. These experts identified the minimum resources needed to prevent human trafficking, support worker outreach, strengthen hotline capacity, and ensure independent monitoring. Despite this, LA28's draft human rights plan included no funding, and when the City Council scheduled a public discussion in May 2026, LA28 did not attend. This absence signaled a lack of transparency and a lack of commitment to human rights obligations. Further, SJI drafted a full response to LA28's draft human rights plan and received no response. This response is provided in Appendix A. The updated ESRA released on June 26th outlines detailed funding for trash collection, traffic control, and venue logistics. However, it contains no City resources whatsoever for human rights protections. The City negotiated for a wide range of services — but not safety for vulnerable workers, survivors, immigrants, or youth. This omission is inconsistent with Los Angeles' stated commitments to human rights. The $3.1 million request is tied to specific, concrete deliverables: • A multilingual public outreach campaign • Supply chain audits of Olympic contracts • Expanded hotline capacity • Victim services, including housing, legal support, and crisis response • Legal monitoring • A prevention innovation fund for community-based organizations • Independent evaluation of the human rights plan These are not theoretical ideas. They represent the minimum infrastructure required to prevent trafficking before it occurs. Once exploitation happens, the harm is irreversible. SJI's December report also highlighted that labor trafficking — not sex trafficking — increases during major sporting events, especially in construction, hospitality, cleaning, and vendor networks. A

public health approach, not a law enforcement-driven one, is essential — particularly given heightened fear among immigrant communities. LA28's draft plan ignored this evidence, relied heavily on law enforcement, and even listed DHS as a victim services partner, despite clear evidence that federal security operations reduce reporting. Meanwhile, LA28 has demonstrated its ability to fund other initiatives. In February, it issued an RFP for $1 million in sustainability funding for community groups — a positive step, but one that underscores the contradiction. LA28 can fund environmental work, but refuses to fund community-based human rights protections for the people most affected by the Games. If LA28 does not fund human rights, the burden will fall entirely on community-based organizations — already overextended, operating with waitlists, and struggling to meet current demand. These groups cannot absorb the additional pressure of an Olympic-level mega event without resources. This is irresponsible and unsustainable. This pattern is not new. FIFA — another billion-dollar enterprise — provided zero funding to Los Angeles for human rights during the World Cup. The City absorbed the cost. Los Angeles cannot continue hosting mega events where billion-dollar organizations profit while the City and local nonprofits shoulder the human rights burden alone. Los Angeles has an opportunity to lead. The City can require LA28 to uphold its responsibilities and invest in human rights and anti trafficking protections that could serve as a model for future Games. Or it can allow itself to be sidelined by LA28's refusal to invest in the communities most vulnerable to exploitation. The $3.1 million request is reasonable, evidence-based, and grounded in what local experts told LA28 directly. It is the minimum needed to prevent trafficking and protect workers, survivors, immigrants, and youth. Human rights protections must be treated as essential infrastructure, not an unfunded afterthought. Thank you for your attention and leadership. With regard, Stephanie Richard, Director Sunita Jain Anti-Human Trafficking Initiative Loyola Law School

Loyola Law School
Loyola Marymount University
Sunita Jain Anti-Trafficking Initiative



June 30, 2026

Dear Los Angeles Councilmembers,

On behalf of the Sunita Jain Anti-Trafficking Initiative at Loyola Law School, we submit this letter urging the Council **not to sign the ESRA** until dedicated funding for human rights and trafficking-prevention efforts is guaranteed.

Since December 2025, advocates, workers, and lived-experience experts have repeatedly raised concerns about the absence of a meaningful human rights plan for the 2028 Olympic Games. In December, SJI submitted a detailed proposal requesting **$3.1 million** in human rights funding — a reasonable, evidence-based target grounded in what **local experts told LA28 directly** when LA28 invited them to consult in October 2025. These experts identified the minimum resources needed to prevent human trafficking, support worker outreach, strengthen hotline capacity, and ensure independent monitoring.

Despite this, LA28's draft human rights plan included **no funding**, and when the City Council scheduled a public discussion in May 2026, **LA28 did not attend**. This absence signaled a lack of transparency and a lack of commitment to human rights obligations. Further, SJI drafted a full response to LA28's draft human rights plan and received no response. This response is provided in Appendix A.

The updated ESRA released on June 26th outlines detailed funding for trash collection, traffic control, and venue logistics. However, it contains **no City resources whatsoever** for human rights protections. The City negotiated for a wide range of services — but not safety for vulnerable workers, survivors, immigrants, or youth. This omission is inconsistent with Los Angeles' stated commitments to human rights.

The **$3.1 million** request is tied to specific, concrete deliverables:
- A multilingual public outreach campaign
- Supply-chain audits of Olympic contracts
- Expanded hotline capacity
- Victim services including housing, legal support, and crisis response
- Legal monitoring
- A prevention innovation fund for community-based organizations
- Independent evaluation of the human rights plan

These are not theoretical ideas. They represent the **minimum infrastructure** required to prevent trafficking **before** it occurs. Once exploitation happens, the harm is irreversible.
SJI's December report also highlighted that **labor trafficking — not sex trafficking — increases during major sporting events**, especially in construction, hospitality, cleaning, and vendor networks. A public-health approach, not a law-enforcement-driven one, is essential — particularly given heightened fear among immigrant communities. LA28's draft plan ignored this evidence, relied heavily on law enforcement, and even listed DHS as a victim-services partner, despite clear evidence that federal security operations reduce reporting.

Meanwhile, LA28 has demonstrated its ability to fund other initiatives. In February, it issued an RFP for **$1 million in sustainability funding** for community groups — a positive step, but one that underscores the contradiction. LA28 can fund environmental work but refuses to fund community-based human rights protections for the people most affected by the Games.
If LA28 does not fund human rights, the burden will fall entirely on **community-based organizations** — already overextended, operating with waitlists, and struggling to meet current demand. These groups cannot absorb the additional pressure of an Olympics-level mega-event without resources. This is irresponsible and unsustainable.

This pattern is not new. FIFA — another billion-dollar enterprise — provided **zero funding** to Los Angeles for human rights during the World Cup. The City absorbed the cost. Los Angeles cannot continue hosting mega-events where billion-dollar organizations profit while the City and local nonprofits shoulder the human rights burden alone.

Los Angeles has an opportunity to lead. The City can require LA28 to uphold its responsibilities and invest in human rights and anti-trafficking protections that could serve as a model for future Games. Or it can allow itself to be sidelined by LA28's refusal to invest in the communities most vulnerable to exploitation.

The **$3.1 million** request is reasonable, evidence-based, and grounded in what local experts told LA28 directly. It is the minimum needed to prevent trafficking and protect workers, survivors, immigrants, and youth.

Human rights protections must be treated as essential infrastructure, not an unfunded afterthought.

Thank you for your attention and leadership.

With regard,



Stephanie Richard, Director
Sunita Jain Anti-Human Trafficking Initiative
Loyola Law School

Loyola Law School
Loyola Marymount University
Sunita Jain Anti-Trafficking Initiative



SJI Response and Recommendations to LA28 Draft Human Rights Strategy

From: Sunita Jain Anti-Trafficking Initiative (SJI), Loyola Law School

To: Los Angeles City Council Ad Hoc Committee on the Olympics and Paralympics and LA28

Date: April 21, 2026

I. Overview

With the 2028 Olympics and Paralympics approaching, LA28 and Los Angeles City released a draft 35-page Human Rights Strategy on **April 7, 2026**. In December 2025, SJI submitted detailed recommendations identifying the specific anti-trafficking measures required for a viable human rights plan to LA28, and we have reviewed the draft strategy with those recommendations in mind. Our focus is on **human trafficking**, where mega-events create predictable risks in labor supply chains, recruitment systems, and service sectors. While the draft acknowledges these heightened risks, its commitments remain high-level, aspirational, and unfunded. As written, the document does not yet constitute an operational human rights strategy.

To be effective, each commitment must be translated into **specific, time-bound, and funded actions** aligned with evidence-based anti-trafficking practices. The following chart summarizes the deliverables, timelines, funding needs, and responsible parties required to operationalize LA28's stated intentions.

Although SJI's analysis focuses exclusively on human trafficking, the draft LA28 Human Rights plan identifies **eight priority areas**—human trafficking, labor rights, accessibility, unhoused communities, civil rights and voice, public safety, safeguarding athletes, and protections for LA28 staff and volunteers. Each of these areas will require its own detailed operational plan with clear objectives, timelines, responsible parties, and dedicated resources to ensure the Human Rights Plan functions as a comprehensive, actionable framework rather than a set of high-level commitments. With the Games still more than two years away, LA28 and the City of Los Angeles have time to develop, fund, and take these concrete actions necessary to prevent and protect against known human rights abuses associated with major sporting events.

SJI's concrete recommendations in the following sections provide a framework to ensure human trafficking prevention measures are implemented early enough to be effective—because the window for meaningful action will close, but there is still time for LA28 and Los Angeles to set a new global standard for human rights protections at the Olympics.

II. Summary of Deliverables, Funding and Timelines for Actions

The table below translates SJI's recommendations into specific operational requirements, including timelines, funding commitments, and responsible implementing entities necessary to operationalize LA28's stated human rights commitments.These investments represent a **small fraction** of overall Games-related expenditures and are targeted at mitigating high-risk, high-cost harms.

Operationalizing LA28 Anti-Trafficking Commitments: Action Plan Summary				
Recommendation	**Summary of Purpose**	**Timeline**	**Estimated Funding/Support**	**Responsible Party**
Fund Public Awareness Campaign on Human Trafficking and Major Sporting Events	Launch awareness campaign six months prior to events; prevention, education, outreach for help	LA28 Contract executed with PR Firm/Local NGO by 10/1/2026. Campaign to begin no later than 1/1/2028 – ends 7/30/2028	$300,000	LA28/Contractor
Fund Enforcement Posting Requirements (City of LA) to Increase Public Awareness	Ensure 13 categories of businesses (airports, bus stations, hotels, massage parlors, hospitals, etc.) post mandated notices on trafficking	City Sends Immediate Requirements to Businesses Increased Enforcement of non-posting by city begins no later than 7/1/2027 increased enforcement ends 7/1/2028.	To be determined by LA City Bureau of Contract Administration, Office of Wage Standards for 1 year of increased enforcement and cost of mailing all businesses reminders	LA City Bureau of Contract Administration, Office of Wage Standards
Fund and Publish Independent Audits of Event-Related Contracts	Worker-led audits of stadiums, hotels, transit hubs, and service contractors	LA28 executes Contract with Independent Auditor with Expertise in Human Trafficking by 10/1/2026. Audits of contracts	$400,000	LA28/Contractor

		supporting Olympics begin no later than 1/1/2028-end 7/30/2028.		
Fund Increased Enforcement of Existing Procurement Standards	Fully leverage City procurement power to prevent trafficking in contracts tied to Olympics & World Cup-Enforcement through Sweat-Free Procurement Ordinance, Zero Tolerance policies, and prevailing wage requirements Remedies include training, contract termination, penalties up to 20% of contract value	Increased monitoring of contracts begins no later than 7/1/2027.	To be determined by LA City Bureau of Contract Administration for 1 year of increased monitoring/enforcement of sporting contracts	City Bureau of Contract Administration
Safeguard Immigrant & Worker Rights	Legal monitoring, community engagement, MOUs with ICE/CBP	LA28 contract signed with local NGOs by 10/1/2026. Increased legal monitoring and outreach by 3/1/2028 or in coordination with increased security presence for games.	$150,000	LA28/Contractor
Increased Outreach and Enforcement Sweat-Free	Ensure sporting event contractors/businesses pay prevailing wages	Increased outreach and enforcement of workers' rights involved	To be determined by LA City Bureau of Contract Administration,	City Bureau of Contract Administration, Office of Wage Standards

Ordinances/Wage & Hour Laws	and comply with labor rights obligations under City ordinances	starting no later than 1/1/2027 ending increased enforcement by 7/30/2028.	Office of Wage Standards for 1.5 years of increased outreach/ enforcement of Labor Compliance Program (payroll review, site visits, worker complaint investigations)	
Coordinate Public Health–Focused Response	Create a formal, cross-agency, public health–focused coordination structure to align prevention, outreach, and survivor services across stakeholders and ensure consistent, proactive responses to human trafficking risks.	Mayor's Office convenes monthly inter-agency meetings starting no later than 1/1/2028 to prioritize learning from agency efforts to date. Last meeting by 10/30/2028 for reflection and next steps after evaluation/report.	To be determined by LA Mayor's Office for 9-month Coordinator position to facilitate monthly meetings six months prior and three months after games	LA Mayor's Office or agency designee
Fund Increased Access to Local Anti-Trafficking Hotline	Expand hotline capacity, staffing, multilingual services, outreach	LA28 Contract signed with local NGO 10/1/2026. Increased support begins with reporting no later than 1/1/2028–ends 7/30/2028.	$250,000	LA28/Local Hotline
Victim Fund for Service Providers	Support survivor services (housing, case management, legal aid, outreach)	LA28 contracts signed with local NGOs by 10/1/2026.	$1,000,000	LA28/approx., 5 Local NGOs

		Increased support periods begin with reporting no later than 1/1/2028 –ends 7/30/2028.		
Funding for Innovative Anti-Trafficking Prevention Initiatives	Creative outreach, prevention campaigns, crisis intervention	LA28 contracts signed with local NGOs by 10/1/2026. Increased support periods and reporting begin as soon as 1/1/2027 –ends 7/30/2028.	$1,000,000	LA28/approx., 5 local NGOs
Fund Independent Evaluations of Human Rights & Anti-Trafficking Efforts	Independent research, compliance review, community feedback, legacy planning	LA28 contract signed with University/Firm by 10/1/2026. Evaluator to design reporting deliverables with each contractor no later than 1/1/2027. Evaluator to collect reporting information by 7/30/2028. Evaluation report provide to LA28 and City no later than 10/1/2028.	$500,000	LA28/Independent Evaluator

The recommendations outlined above represent an estimated total funding commitment of approximately **$3.6 million from LA28 to** support external partners. In addition, increased enforcement and coordination responsibilities will require supplemental resources from the City of Los Angeles, with total costs to be determined based on City agency assessments of staffing and operational needs.

III. Operationalizing LA28's Stated Anti-Trafficking Measures Using Evidence-Based Recommendations

The LA28 Draft Human Rights Strategy indicates that LA28 is already implementing policies to address human trafficking risks and intends to expand these efforts ahead of and during the Games. These efforts include: (1) public awareness and reporting mechanisms; (2) due diligence guidelines for vendors and contractors; (3) protocols for responding to trafficking incidents; (4) collaboration with organizations that provide services to victims and support prevention efforts; and (5) accountability, monitoring and evaluation of human rights risks and impacts.

While these measures are necessary, they are not actionable in LA28 Human Rights Plan. The Strategy does not provide the level of specificity, resourcing, or accountability required to operationalize these commitments at the scale of the Games. The following sections analyze each measure by identifying key gaps and using the actionable and timebound recommendations from the chart above proposes concrete, evidence-based measures LA28 can take to ensure effective prevention, protection, and response.

1) Human Trafficking Public Awareness and Reporting

What LA28's Draft Strategy Says

LA28 states it will publicize reporting channels, maintain a hotline and website, and distribute informational materials at venues and online. It references existing posting requirements for hotels and motels:

> *"LA28 intends to publicize redress mechanisms for individuals to raise concerns and seek remediation. LA28 will also maintain a reporting hotline and website for individuals or groups to report, including anonymously, Games-related problems for which other reporting mechanisms do not exist. The LA28 reporting channels will be well-publicized and accessible."*
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> ...
>
> *"Informational materials, such as brochures, posters, and/or digital content, will be available at event venues, non-Games venues, and online. For example, hotels, motels, and inns are required to post notices to combat human trafficking in conspicuous locations. Bystanders will be able to report concerns to authorities and other stakeholders with technology tools like multilingual hotlines to facilitate reporting and assistance for trafficking victims or others who have suffered human rights violations."*

Gap

The draft does **not** specify: Who will design and produce materials, when it will launch, how it will reach the workers most at risk, how the city will use its existing authority to help raise public awareness, and what resources will be needed.

SJI Recommendations

To effectively address the gaps in public awareness and reporting identified in the LA28 Draft Human Rights Strategy, SJI recommends that LA28 **fund and implement a comprehensive public awareness campaign** focused on human trafficking risks associated with major sporting events. This campaign should prioritize **prevention**, **education**, and **multilingual outreach** to ensure that workers, businesses, and the public understand how trafficking occurs and how to seek help. The campaign should be developed in partnership with a qualified public relations firm or local NGO, with a contract executed by **October 1, 2026**, and implementation beginning no later than **January 1, 2028**, continuing through the duration of the Games. SJI recommends allocating approximately **$300,000** for this effort, with LA28 responsible for funding and overseeing implementation in coordination with external partners.

In addition, SJI recommends that LA28 **support increased City enforcement of existing human trafficking posting requirements** to ensure that **mandated notices** are **visible** and **accessible** across high-risk sectors. A Los Angeles city ordinance already requires 13 categories of businesses—including hotels, transportation hubs, and other public-facing establishments—to post information about human trafficking and available resources. However, compliance remains inconsistent without proactive enforcement. To address this, the City should immediately issue compliance notices to covered businesses and implement a period of increased enforcement beginning no later than **July 1, 2027**, and continuing through **July 1, 2028**. While the funding required for this effort should be determined by the City based on enforcement needs, it will likely involve additional resources for the Bureau of Contract Administration and the Office of Wage Standards to conduct outreach, monitoring, and compliance actions and this increased cost should be calculated and passed on to LA28 in accordance with the game's agreement on enhanced city services.

Justification

Major sporting events dramatically increase the number of workers, travelers, and temporary laborers moving through a city, creating conditions where exploitation can occur long before the Games begin. Workers in construction, hospitality, transportation, and temporary labor sectors often receive little to no information about their rights, the risks they may face, or how to seek help. Without early, multilingual, and culturally relevant outreach, many never learn about available protections or reporting pathways.

Public awareness is also essential because trafficking thrives in environments where the public does not recognize the signs or know how to respond. Los Angeles Municipal Code, Chapter V, Article 9, Section 59.00 ("Notices Related to Slavery and Human Trafficking") mandates posting on human trafficking for 13 types of businesses — but compliance is inconsistent, and thousands of covered businesses fail to display required notices unless enforcement is proactive. A

well-funded, survivor-informed public outreach campaign paired with city notices and enforcement to businesses to post about human trafficking as required by current city ordinance ensures that accurate information reaches workers, visitors, and community members at the scale required for events of this magnitude.

2) Due Diligence Guidelines for Vendors, Sponsors, and Contractors

What LA28's Draft Strategy Says

LA28 will provide due diligence guidelines outlining human rights responsibilities, including preventing trafficking. It also indicates that LA28 has the right to conduct audits of this compliance:

> "*LA28 expects our contractors and subcontractors to uphold labor rights. The Responsible Sourcing Guidelines for Service Providers require all suppliers and subcontractors to comply with all applicable legislation pertaining to human rights, including working conditions, health and safety requirements, and guidelines in international texts including the UNGP's, and to permit LA28 to conduct audits of their compliance.* "

Gap

Guidelines alone are **insufficient**. Evidence from prior Olympics and World Cups shows that voluntary standards do not prevent exploitation in subcontracting chains or recruitment systems. Los Angeles City already has strong procurement standards that can and should be enforced under Charter, Div. 10, Article 17, Sec. 10.43 (2005) ("Sweat-Free Procurement Ordinance') and LA28 should commit to conducting audits to ensure that these standards are adhered to and, corrective action can be taken before and during the games.

SJI Recommendations

To address these risks, SJI recommends that **LA28 fund independent audits of event-related contracts** across high-risk sectors, including construction, hospitality, security, and event services. LA28 should contract with an independent auditor with expertise in human trafficking and labor rights by **October 1, 2026**, with audits commencing no later than **January 1, 2028**, and continuing through the Games. SJI recommends allocating approximately **$400,000** to support this audit program.

In parallel, LA28 should **fund increased enforcement of existing City procurement standards**, including the Sweat-Free Procurement Ordinance and Zero Tolerance policies related to human trafficking. Increased monitoring of Games-related contracts should begin no later than **July 1, 2027**, with funding requirements to be determined by the City's Bureau of Contract Administration based on staffing and enforcement needs and passed on to LA28 in accordance with the game's agreement on enhanced city services.

Justification

The greatest trafficking risks connected to major sporting events occur in the recruitment and labor-supply systems that feed construction, hospitality, security, and event-services sectors. Workers are often charged illegal recruitment fees, misled about job conditions, or pressured into debt-based arrangements before they ever arrive in Los Angeles. Once workers are bound by debt or misinformation, downstream enforcement is rarely sufficient to prevent exploitation.

Voluntary guidelines do not address these structural risks. Past Olympics and World Cups have repeatedly shown that unenforced standards allow abusive subcontracting, wage theft, and coercive recruitment to flourish. Subcontracting chains can be long and opaque, making it easy for contractors to disclaim responsibility for abuses occurring at lower tiers.

Independent, worker-informed audits and enforceable procurement requirements are therefore essential. They create transparency in recruitment pathways, ensure contractors disclose subcontracting structures, and allow for early detection of coercive practices. Without binding requirements and independent verification, trafficking risks remain hidden until after harm has occurred

3) Protocols for Responding to Trafficking Incidents

What LA28's Draft Strategy Says

LA28 commits to establishing protocols for responding to trafficking incidents, including victim support and legal action. The draft states:

> *"U.S. federal authorities have enacted a broad range of laws, regulations, and programs to reduce the risk of human trafficking. For example, the Department of Homeland Security's (DHS) Homeland Security Investigations (HSI) unit runs the Victim Assistance Program to support victims of federal crimes, including human trafficking, child exploitation, and sex tourism…. "*
>
> *"Victims and others may contact multiple hotline numbers to report suspected human trafficking; these mechanisms will be publicized widely, including at transportation hubs, hotels, Games venues, and in other locations across the city. Specifically, persons seeking to report possible trafficking violations in the run-up to or during the Games should call the National Trafficking Hotline at (888) 373-7888 or text "Help" to the Be Free line (233-733)."*

Gap

The draft does not address the increased fear of immigration enforcement due to national security designations and ongoing federal immigration enforcement, in Los Angeles a city of immigrant workers. In fact, it highlights law enforcement, including DHS, as a viable victim services partner. Further, it depends on existing city anti-trafficking resources, which are already underfunded and stretched too thin.

SJI Recommendations

To ensure safe and effective access to services, SJI recommends that LA28 f**und expanded legal monitoring and outreach to safeguard immigrant and worker rights and prevent human trafficking** during the Games. LA28 should contract with one or more local NGOs by **October 1, 2026**, with legal monitoring and outreach beginning no later than **March 1, 2028**, or in coordination with increased security operations. SJI recommends allocating approximately **$150,000** for this effort.

SJI further recommends that LA28 **fund expanded capacity for a local anti-trafficking hotline that operates independently of law enforcement** and provides multilingual, trauma-informed intake and referrals. LA28 should contract with a local provider by **October 1, 2026**, with expanded services beginning **January 1, 2028**, and continuing through the Games. SJI recommends allocating approximately **$250,000** to support increased staffing, language access, and outreach.

Justification

During major sporting events, the combination of increased federal security and heightened immigration scrutiny creates an environment where many workers — especially immigrants — fear reporting exploitation. When workers believe that seeking help may expose them to detention or deportation, trafficking goes unreported and unaddressed.

Effective response must therefore prioritize independent legal monitoring and outreach for workers during periods of heightened national security presence. Additionally, increased funding for a local hotline not connected to law enforcement that provides multilingual trauma-informed intake, and referrals to community-based organizations that workers already trust is needed.

Demand for hotline support should increases during mega-events, especially with dedicated human trafficking awareness campaigns. Without expanded capacity, survivors face long wait times or are turned away. Dedicated funding for hotline expansion and legal monitoring ensures that the system can respond effectively when incidents occur during major sporting events.

4) Collaboration and Services To Prevent Human Trafficking

What LA28's Draft Strategy Says

LA28 emphasizes collaboration with organizations that identify and support trafficking survivors. The draft states**:**

> *"As noted previously, these Games have been designated as a National Special Security Event (NSSE). (See section on Safety and Security). In this context, local, state, national, and international law enforcement agencies will ramp up information sharing and coordination. Law enforcement personnel will be visible at event venues, transportation hubs, and popular gathering places and will contribute to the effort to prevent human trafficking more effectively during the Games.*

"Victim-focused, trauma-informed redress mechanisms are essential for survivors of human trafficking. Advocacy groups work independently or closely with law enforcement agencies to deliver justice to violators and assist victims in multiple languages to pursue redress and protections. Multiple stakeholders also offer robust legal services for such victims. LA28 is in touch with groups that help support survivors in connection with this Strategy"

Gap

LA28's commitment to services and collaboration aligns with best practices, but to be effective at the scale required for the Games, that collaboration must be formalized, resourced, and structured—not simply acknowledged.

The draft plan also places significant emphasis on collaboration with law enforcement. Given the well-documented dynamics of human trafficking and the consistent evidence that fear of law enforcement reduces reporting and access to help for many survivors—particularly immigrant workers—this emphasis is misplaced. A law-enforcement-centered approach can undermine prevention and deter victims from seeking assistance. For these reasons, the focus on law enforcement should be reconsidered in favor of a public-health, survivor-centered model that prioritizes safety, trust, and access to services. Evidence from prior mega-events demonstrates that informal or ad hoc collaboration is insufficient to address trafficking risks. A formal coordination structure (building on existing interagency coordination structures where possible) is needed to bring together government agencies, service providers, labor organizations, and community groups in a sustained and organized manner grounded in a public health, survivor-centered approach

Finally, there is no mention of resources or collaboration with community partners to prevent trafficking before it occurs, both in the lead-up to and during the Games. As it currently stands, the focus is only on serving victims after the fact when prevention should be a core element of LA28's human rights plan.

SJI Recommendations

To ensure effective coordination, SJI recommends that LA28 support the e**stablishment of a formal, public health–focused coordination structure** led by the Mayor's Office or a designated agency. This structure should convene government agencies, service providers, labor organizations, and community-based organizations to coordinate anti-trafficking efforts in a sustained and organized manner. Monthly interagency meetings should begin no later than **January 1, 2028**, and continue through **October 30, 2028**. Funding requirements should be determined by the City but should include support for a dedicated coordinator. and passed on to LA28 in accordance with the game's agreement on enhanced city services.

SJI also recommends that LA28 establish a **dedicated victim services fund to expand capacity among local organizations** providing housing, case management, legal services, and outreach for trafficking survivors. LA28 should contract with approximately **five local NGOs** by **October 1, 2026**, with expanded services beginning no later than **January 1, 2028**, and continuing through the Games. SJI recommends allocating approximately **$1,000,000** to support this effort.

In addition, SJI recommends that LA28 **establish a prevention and innovation fund** to support community-based organizations in developing and implementing evidence-based anti-trafficking initiatives. Contracts should be executed by **October 1, 2026**, with implementation beginning as early as **January 1, 2027**, and continuing through the Games. SJI recommends allocating approximately **$1,000,000** for this fund.

Justification

Collaboration during major sporting events must be structured, sustained, and grounded in a public-health approach. Past events have shown that informal or ad hoc coordination leads to gaps in communication, inconsistent responses, and missed opportunities to prevent harm. A public-health model emphasizes prevention, early intervention, and access to services — rather than enforcement-driven strategies that can deter reporting.

Service providers in Los Angeles already operate at or near capacity, and major sporting events significantly increase demand for emergency housing, legal assistance, case management, and crisis intervention. Without early investment, survivors may face long waitlists or be unable to access services at all. Dedicated funding and a formal coordination structure ensure that these partners can scale their work to meet the demands of the Games

Mega-events also tend to direct the majority of resources toward law enforcement and security, leaving prevention efforts for human rights and trafficking prevention unfunded. Dedicated funding for proactive prevention measures ensures that vulnerable communities are not victimized in the first place and allow organizations to reach workers early, identify risks before harm occurs, and provide support in real time**. It is this focus on prevention that LA28's draft human rights plan currently lacks and the draft plan must be updated to better prioritize and resource.**

5) Accountability and Measurable Impact

What LA28's Draft Strategy Says

LA28's draft commits to monitoring itself and receiving feedback and reviewing its human rights risks before, during, and after the Games. The draft states**:**

> *"As part of the execution of this Strategy and to contribute to its effectiveness, LA28 intends to review human rights risks encountered, mitigated, and resolved in the lead-up to and during the Games, as well as those that may require further follow-up after the Games. This monitoring process will include regular communication with LA28 staff and volunteers, suppliers and their related coalitions, contractors, venue officials and staff, government officials, labor unions, stakeholder groups, and others as appropriate, to identify concerns and evaluate progress in addressing them. LA28 will continue to monitor opportunities for best practices to inform our approach."*

Gap

While the draft outlines an internal monitoring and communication process, it does not establish an independent accountability mechanism.

SJI Recommendations

To ensure accountability, credibility, and measurable impact, SJI recommends that LA28 retain an **independent evaluator to oversee the implementation and effectiveness of all human rights and anti-trafficking initiatives** associated with the Games. This evaluator should be responsible for establishing baseline human rights conditions prior to implementation, defining clear and measurable key performance indicators (KPIs), and assessing implementation progress and outcomes over time.

LA28 should execute a contract with a qualified independent evaluator no later than **October 1, 2026**. The evaluator should establish baseline metrics by **January 1, 2027**, develop reporting frameworks in coordination with implementing partners, and collect and analyze data throughout the pre-Games and Games-time period. A final evaluation report should be delivered to LA28 and the City no later than **October 1, 2028**. SJI recommends allocating approximately **$500,000** to support evaluation, KPI development, data collection, and public reporting.

This independent evaluation framework is essential to ensuring that LA28's commitments are not only implemented, but demonstrably effective. It should include publicly available reporting, interim assessments, and a final post-Games analysis to measure outcomes and identify areas for improvement. In addition to tracking performance, the evaluation should serve as a mechanism for transparency and accountability, providing a clear record of actions taken and their impact.

Justification

Accountability is essential because past Olympics have repeatedly failed to prevent trafficking despite human rights plans being in place. Without independent evaluation, it is impossible to determine whether prevention measures were implemented, whether they were effective, or where improvements are needed.

A strong evaluation framework includes baseline data, clear performance indicators, reporting, and a final assessment after the Games. This ensures transparency, allows for course corrections, and creates a legacy of learning that future host cities can build upon. Independent evaluation also strengthens public trust and demonstrates that Los Angeles is committed not only to promises around human rights but to measurable outcomes.

IV. Conclusion

LA28's existing commitments provide a necessary foundation for addressing human trafficking risks, but without the operational measures described above, they will remain insufficient to address the scale and complexity of those risks. The evidence is clear that effective prevention requires enforceable procurement standards, oversight of recruitment practices, survivor-centered response systems, and sustained investment in prevention and services.

By strengthening each of its stated measures with funded, time-bound, and enforceable actions, LA28 can transform its Strategy into a fully operational plan that aligns with both the evidence base and the City's vision for a safe, inclusive, and equitable Games legacy.

ABOUT THE SUNITA JAIN ANTI TRAFFICKING INITIATIVE

The Sunita Jain Anti-Trafficking Policy Initiative (SJI) is an evidence-based and survivor-informed think tank based out of Loyola Law School. SJI intentionally works towards systemic change and filling the gaps in human trafficking prevention by focusing its policy advocacy on the intersectionality of 5 pillars: Government Accountability, Racial Justice, Immigrant Justice, Climate Justice and Economic Justice. **16. About SJI**

FOR MORE INFORMATION
Stephanie Richard, Esq., Policy Director — stephanie.richard@lls.edu — (213) 736-8148
Paloma Bustos, MSW, Policy Associate — paloma.bustos@lls.edu — (213) 252-7447

Sunita Jain Anti-Trafficking Initiative
Loyola Law School, 919 Albany St, Los Angeles, CA 90015
Phone: (213) 252-7442 — Email: anti-trafficking@lls.edu

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