

Communication from Public

Name: Stephanie Richard, Sunita Jain Anti-Trafficking Initiative, Loyola Law School

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Comments for Public Posting: SJI Recommendations to Prevent Trafficking Before and During the Olympics vs. LA28 Draft Human Rights Strategy Submitted to: Los Angeles City Council Ad Hoc Committee on the Olympics and Paralympics From: Sunita Jain Anti-Trafficking Initiative (SJI), Loyola Law School Summary LA28's December 19, 2025 Draft Human Rights Strategy lists important commitments to prevent human trafficking but lacks the operational elements necessary to make those commitments effective. In December, the Sunita Jain Initiative (SJI) released concrete recommendations to prevent human trafficking before and during major sporting events. SJI closely reviewed LA28's draft human rights plan and found critical gaps in funding, binding measures, concrete objectives, timelines, and independent monitoring. We urge LA28 to adopt the concrete corrective actions below and publish a final operational plan with timelines, budgets, and KPIs to provide concrete milestones for the human rights strategy. Findings • Funding: SJI recommends a dedicated investment of \$2.75–\$3.5M by LA28 for prevention, survivor services, hotline capacity, and independent evaluation. LA28: no dedicated funding line, no victim fund, no cost estimates. Status: Not addressed. • Procurement & contracts: SJI calls for independent audits of sporting event contracts over \$400,000 for forced labor risks LA28: references Responsible Sourcing Guidelines and audits but provides no binding clause text, enforcement plan, or audit funding. Status: Not addressed. • Survivor outreach, services & hotline capacity: SJI calls for increased public awareness of labor trafficking, expanded hotline capacity and a specialized victim fund for a total investment of \$1.55 million. LA28: lists existing hotlines and will publicize reporting channels but does not commit funding or capacity increases. It also mentions public awareness and city posting requirements but has not plan for enforcement and compliance monitoring. Status: Partially addressed. • Immigration sensitive survivor protections: SJI recommends protocols to avoid immigration enforcement harms and funding for legal monitoring at \$150,000. LA28: highlights law enforcement coordination (NSSE) and does not address harms to vulnerable communities or propose a survivor protection MOU. Status: Not addressed. •

Prevention of trafficking: SJI recommends a \$1 million prevention fund for human trafficking efforts that local community-based organizations can apply to for support. LA28: provides no funding for prevention for community-based organizations. Status: Not addressed. • Independent monitoring & public reporting: SJI requires independent evaluation and public reporting funded at \$500,000. LA28: mentions audits but no independent evaluator, KPIs, baselines, or reporting cadence. Status: Not addressed. • Cross agency coordination with a public health approach: SJI calls for survivor first coordination and a public health approach. LA28: lists stakeholders and law enforcement coordination but lacks operational protocols and does not address concerns about law enforcement. Status: Partially addressed. Why the LA28 draft is not an operational plan The draft is a policy framework without objectives, action level protocols, budget commitments, timelines, or independent monitoring. Without these elements, commitments cannot be verified or enforced. The emphasis on security coordination (NSSE) heightens the risk that enforcement priorities could overshadow survivor centered protections unless explicit protocols, objectives, and budgets are adopted.



SJI Recommendations to Prevent Trafficking Before and During the Olympics vs. LA28 Draft Human Rights Strategy

Submitted to: Los Angeles City Council Ad Hoc Committee on the Olympics and Paralympics

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

Date: April 13, 2026

Summary

LA28's December 19, 2025 Draft Human Rights Strategy lists important commitments to prevent human trafficking but lacks the operational elements necessary to make those commitments effective. In December, the Sunita Jain Initiative (SJI) released concrete recommendations to [prevent human trafficking before and during major sporting events](#). SJI closely reviewed LA28's draft human rights plan and found critical gaps in funding, binding measures, concrete objectives, timelines, and independent monitoring. We urge LA28 to adopt the concrete corrective actions below and publish a final operational plan with timelines, budgets, and KPIs to provide concrete milestones for the human rights strategy.

Findings

- **Funding:** SJI recommends a dedicated investment of **\$2.75–\$3.5M** by LA28 for prevention, survivor services, hotline capacity, and independent evaluation. **LA28:** no dedicated funding line, no victim fund, no cost estimates. **Status: Not addressed.**
- **Procurement & contracts:** SJI calls for independent audits of sporting event contracts over **\$400,000** for forced labor risks. **LA28:** references Responsible Sourcing Guidelines and audits but provides no binding clause text, enforcement plan, or audit funding. **Status: Not addressed.**
- **Survivor outreach, services & hotline capacity:** SJI calls for increased public awareness of labor trafficking, expanded hotline capacity and a specialized victim fund for a total investment of **\$1.55 million**. **LA28:** lists existing hotlines and will publicize reporting channels but does not commit funding or capacity increases. It also mentions public awareness and city posting requirements but has no plan for enforcement and compliance monitoring. **Status: Partially addressed.**
- **Immigration-sensitive survivor protections:** SJI recommends protocols to avoid immigration enforcement harms and funding for legal monitoring at **\$150,000**. **LA28:** highlights law enforcement coordination (NSSE) and does not address harms to vulnerable communities or propose a survivor protection MOU. **Status: Not addressed.**
- **Prevention of trafficking:** SJI recommends a **\$1 million** prevention fund for human trafficking efforts that local community-based organizations can apply to for support. **LA28: provides no funding for prevention for community-based organizations. Status: Not addressed.**

- **Independent monitoring & public reporting:** SJI requires independent evaluation and public reporting funded at \$500,000. LA28: mentions audits but no independent evaluator, KPIs, baselines, or reporting cadence. **Status: Not addressed.**
- **Cross-agency coordination with a public health approach:** SJI calls for survivor first coordination and a public health approach. LA28: lists stakeholders and law enforcement coordination but lacks operational protocols and does not address concerns about law enforcement. **Status: Partially addressed.**

Why the LA28 draft is not an operational plan

The draft is a policy framework without objectives, action-level protocols, budget commitments, timelines, or independent monitoring. Without these elements, commitments cannot be verified or enforced. The emphasis on security coordination (NSSE) heightens the risk that enforcement priorities could overshadow survivor centered protections unless explicit protocols, objectives, and budgets are adopted.

Recommended corrective actions (prioritized, with timeline & funding requests)

- 1. Overall: Commit to an Anti-Trafficking Fund — \$3,500,000**
 - **Deadline: Decision within 90 days; fund operational within 120 days.**
 - **Funding: \$3,000,000.**
 - **Accountability: LA28 CFO publishes a one-page budget note and public spend reports.**
- 2. Fund a local NGO to lead public awareness & outreach — \$300,000**
 - **Action: Award \$300,000 to a qualified local NGO to design and run a labor-trafficking public awareness and outreach campaign targeted at workers, and sporting events businesses.**
 - **Deadline: Contract for Campaign signed within 120 days. Campaign to begin six months prior to the Olympics.**
 - **Deliverable: NGO submits campaign plan, target reach metrics, and a post-campaign impact summary.**
- 3. Fund independent audits of sporting-event contracts — \$300,000**
 - **Action: Contract an independent organization to audit procurement and labor practices across sporting-event contracts and supply chains.**
 - **Deadline: Contract signed within 120 days; audits commence 1 year before the Olympics.**
 - **Funding: \$300,000 for the initial audit program.**

- **Deliverable: Published audit scope, findings, and a remediation plan with timelines.**
- 4. Scale hotline and survivor services — \$1,250,000 total**
- **Action: Expand hotline staffing, multilingual triage, and referral pathways; fund NGOs to increase case management and emergency housing capacity.**
 - **Deadline: Sign MOUs with local providers within 120 days; hotline surge capacity live six months before games.**
 - **Funding: \$250,000 for hotline expansion; \$1,000,000 for survivor service capacity.**
 - **Deliverable: MOUs specifying service levels, response times, and referral protocols.**
- 5. Adopt survivor-protection MOU and legal monitoring — \$150,000**
- **Action: Execute a survivor-protection MOU with local agencies that (a) limits information-sharing with immigration enforcement absent survivor consent or imminent public-safety risk, (b) requires trauma-informed intake, and (c) establishes an independent legal monitoring and complaint channel for law-enforcement abuses.**
 - **Deadline: Sign MOU within 120 days.**
 - **Funding: \$150,000 to support legal monitoring, MOU implementation, and public posting.**
 - **Deliverable: Publicly posted MOU and MOU for outreach/services.**
- 6. Funding Innovative Human Trafficking Prevention — \$1,000,000**
- **Action: Create application fund for NGOs, Approve grant funding for innovative prevention projects**
 - **Deadline: Create fund within 120 days. Sign MOUs with providers within 270 days.**
 - **Funding: \$1,000,000 to be distributed for human trafficking prevention programs before and during the games.**
 - **Deliverable: Results of programs described in funding application provided to independent evaluator 30 days after games conclude.**
- 7. Hire an independent evaluator and publish KPIs — \$500,000**
- **Action: Retain an independent evaluator to set baselines, define KPIs, measure implementation, and publish findings.**

- **Deadline: Contract within 120 days; baseline report within 6 months; quarterly public reports thereafter.**
- **Funding: \$500,000 for evaluation, KPI development, and reporting.**
- **Deliverable: Public KPI and six month evaluation reports with final report due three months after the games.**

Total funding requested: \$3,500,000

Conclusion

LA28's stated commitments are necessary but insufficient. To prevent trafficking and protect survivors, LA28 must convert policy into funded, time-bound, enforceable actions with independent monitoring. We urge LA28 to adopt the corrective actions above, publish a final draft plan with these specific and time bound commitments and fund an independent evaluator to document its human right plan process and results.