

Communication from Public

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

Date Submitted: 05/04/2026 12:02 PM

Council File No: 15-0989-S68

Comments for Public Posting: Dear Councilmembers: We respectfully submit this public comment regarding Council File 15 0989 S68, concerning the negotiation of an Enhanced City Resources Master Agreement (ECRMA) between the City of Los Angeles and the Los Angeles Organizing Committee for the 2028 Olympic and Paralympic Games (LA28). We strongly support the Council’s direction to protect the City financially by requiring LA28 to reimburse the City for all Enhanced City Resources (ECR) that exceed normal and customary operations. However, we urge the Council to ensure that human rights protections—particularly labor rights enforcement, human trafficking prevention, and survivor services—are explicitly recognized, costed, and included as reimbursable Enhanced City Resources under the ECRMA. Human Rights Services Are Predictable Enhanced City Resources Mega events such as the Olympic and Paralympic Games predictably generate increased demand for City services related to labor exploitation, wage theft, and human trafficking, particularly in industries and geographic areas directly affected by Games operations, construction, hospitality, transportation, security, and temporary staffing. These impacts are not speculative. They are foreseeable consequences of Games related economic activity and therefore fall squarely within the scope of “Enhanced City Resources exceeding the City’s normal and customary operations required for and in direct support of the Games”, as described in Recommendation 1(a) of this motion. If these services are not clearly incorporated into the ECRMA, the City risks absorbing significant Games related costs through its General Fund or leaving critical community needs unmet. Direction Needed to Calculate Enhanced Human Rights–Related Costs To fully implement the intent of Council File 15 0989 S68, we urge the Council, in instructing the City Administrative Officer (CAO) and Chief Legislative Analyst (CLA), and in requesting the City Attorney, to ensure that the ECRMA requires advance calculation and reimbursement of enhanced human rights–related services. Specifically, we urge the Council to direct the following departments and offices to identify, quantify, and project their increased staffing, operational, and programmatic costs directly attributable to the Games, so those costs can be included in the ECRMA payment schedule under Recommendation 1(e): 1.

Bureau of Contract Administration (BCA) o Enforcement of the Sweat Free Procurement Ordinance and labor standards for Games related contracts and vendors o Increased audits, investigations, and compliance monitoring tied to LA28 procurement and construction 2. Office of Wage Standards (OWS) o Enhanced wage theft enforcement and worker complaint investigations o Expanded worker outreach and education in high risk Games impacted sectors o Multilingual services required by the surge in temporary and immigrant labor 3. Mayor's Office or Designated Lead Coordination Entity o Cross departmental coordination of the City's human rights and anti trafficking response o Interagency planning, reporting, and compliance functions connected to Games operations We also request these costs be calculated with reference to the Games Footprint for each venue and site, as required by Recommendation 1(d), recognizing that human rights impacts will be geographically concentrated in specific communities hosting venues, transportation hubs, and hospitality infrastructure Advance Payment and Contingency Funds Must Cover Human Rights Costs We also urge the Council to ensure that: • Advance payments under Recommendation 1(e) include human rights and anti trafficking service costs before they are incurred, rather than reimbursing the City after departments have already absorbed those expenses; and • The amendment to the Games Agreement contemplated in Recommendation 2 explicitly allows LA28 contingency funds to be used to cover unreimbursed human rights-related ECR, prior to declaration of any surplus or legacy disbursement. These protections are essential to prevent service gaps, workforce burnout, and financial strain on departments and nonprofit partners during the Games period.



Honorable Members of the Los Angeles City Council
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Council File 15-0989-S68 – Public Comment on Enhanced City Resources Master Agreement (ECRMA) with LA28

Dear Councilmembers:

We respectfully submit this public comment regarding **Council File 15-0989-S68**, concerning the negotiation of an Enhanced City Resources Master Agreement (ECRMA) between the City of Los Angeles and the Los Angeles Organizing Committee for the 2028 Olympic and Paralympic Games (LA28).

We strongly support the Council’s direction to protect the City financially by requiring LA28 to reimburse the City for all Enhanced City Resources (ECR) that exceed normal and customary operations. However, we urge the Council to ensure that **human rights protections—particularly labor rights enforcement, human trafficking prevention, and survivor services—are explicitly recognized, costed, and included as reimbursable Enhanced City Resources under the ECRMA.**

Human Rights Services Are Predictable Enhanced City Resources

Mega-events such as the Olympic and Paralympic Games predictably generate **increased demand for City services related to labor exploitation, wage theft, and human trafficking**, particularly in industries and geographic areas directly affected by Games operations, construction, hospitality, transportation, security, and temporary staffing.

These impacts are not speculative. They are foreseeable consequences of Games-related economic activity and therefore fall squarely within the scope of **“Enhanced City Resources exceeding the City’s normal and customary operations required for and in direct support of the Games”**, as described in Recommendation 1(a) of this motion.

If these services are not clearly incorporated into the ECRMA, the City risks absorbing significant Games-related costs through its General Fund or leaving critical community needs unmet.

Direction Needed to Calculate Enhanced Human Rights–Related Costs

To fully implement the intent of Council File 15-0989-S68, we urge the Council, in instructing the **City Administrative Officer (CAO)** and **Chief Legislative Analyst (CLA)**, and in requesting the **City Attorney**, to ensure that the ECRMA requires **advance calculation and reimbursement of enhanced human rights–related services**.

Specifically, we urge the Council to direct the following departments and offices to **identify, quantify, and project their increased staffing, operational, and programmatic costs directly attributable to the Games**, so those costs can be included in the ECRMA payment schedule under Recommendation 1(e):

1. **Bureau of Contract Administration (BCA)**
 - Enforcement of the Sweat-Free Procurement Ordinance and labor standards for Games-related contracts and vendors
 - Increased audits, investigations, and compliance monitoring tied to LA28 procurement and construction
2. **Office of Wage Standards (OWS)**
 - Enhanced wage theft enforcement and worker complaint investigations
 - Expanded worker outreach and education in high-risk Games-impacted sectors
 - Multilingual services required by the surge in temporary and immigrant labor
3. **Mayor’s Office or Designated Lead Coordination Entity**
 - Cross-departmental coordination of the City’s human rights and anti-trafficking response
 - Interagency planning, reporting, and compliance functions connected to Games operations

These requests are more fully detailed in our April response to LA28 draft human rights plan available [here](#).

We also request these costs be calculated with reference to the **Games Footprint for each venue and site**, as required by Recommendation 1(d), recognizing that human rights impacts will be geographically concentrated in specific communities hosting venues, transportation hubs, and hospitality infrastructure.

Advance Payment and Contingency Funds Must Cover Human Rights Costs

We also urge the Council to ensure that:

- **Advance payments** under Recommendation 1(e) include **human rights and anti-trafficking service costs before they are incurred**, rather than reimbursing the City after departments have already absorbed those expenses; and

- The amendment to the Games Agreement contemplated in Recommendation 2 explicitly allows **LA28 contingency funds to be used to cover unreimbursed human rights–related ECR**, prior to declaration of any surplus or legacy disbursement.

These protections are essential to prevent service gaps, workforce burnout, and financial strain on departments and nonprofit partners during the Games period.

Conclusion

Council File 15-0989-S68 provides an important opportunity for Los Angeles to ensure that the costs of hosting the Olympic and Paralympic Games are **fully borne by LA28—and not by City departments, community providers, or vulnerable residents**.

We respectfully urge the Council to ensure that the ECRMA:

- Explicitly recognizes labor rights enforcement, anti-trafficking prevention, and survivor services as Enhanced City Resources;
- Requires named departments to calculate and report their Games-related increases in service demand; and
- Includes those costs in advance payment schedules and contingency coverage.

Doing so will align financial protections with the City’s stated human rights commitments and ensure that Los Angeles sets a global standard not only for hosting the Games, but for doing so responsibly and equitably.

Please do not hesitate to contact us should you have any questions. Stephanie.Richard@lls.edu |

(213) 375-8377

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie Richard". The signature is fluid and cursive, with a long horizontal stroke at the end.

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