

Communication from Public

Name: Paloma Bustos
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Comments for Public Posting: See attachment. Thank you, Paloma Bustos, Policy Associate,
Loyola Law School, Sunita Jain Anti-Trafficking Initiative



August 14, 2026

Los Angeles City Council
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

**Re: Council File 15-0989-S68 – Enhanced City Resources Master Agreement (ECRMA)
for the 2028 Olympic and Paralympic Games**

Dear Members of the Los Angeles City Council,

I am submitting this public comment on behalf of the Sunita Jain Anti-Trafficking Initiative (SJI) at Loyola Law School regarding the City's ongoing negotiations and planning for the 2028 Olympic and Paralympic Games.

Since last year, we have been advocating for human rights and trafficking prevention to be included in the City's planning and negotiations for the Games. In 2025, we released a report, *Preventing and Addressing Human Trafficking Related to Major Sporting Events in Los Angeles*, which describes the heightened risks of trafficking and labor exploitation connected to major sporting events and provides recommendations focused on prevention, worker protections, services, and accountability.¹

In April 2026, SJI built on those recommendations through its *Response and Recommendations to the LA28 Draft Human Rights Strategy*. That response identified specific steps needed to turn LA28's human rights commitments into concrete, funded actions. It also identified City functions that will require additional staffing and resources.² The report notes that LA28's Human Rights Strategy recognizes human trafficking and other human rights risks, but that these commitments need clear responsibilities, timelines, funding, and accountability in order to be effective.

For example, SJI recommended additional resources for the **Bureau of Contract Administration and Office of Wage Standards** to increase enforcement of the City's existing human trafficking posting requirements and conduct outreach, monitoring, and compliance work. We also recommended additional resources for the **Bureau of Contract Administration** to increase monitoring and enforcement of existing City procurement standards for Games-related contracts, including the Sweat-Free Procurement Ordinance and human trafficking zero-tolerance policies.

Our recommendations also call for increased worker outreach and enforcement of wage and labor protections by the Bureau of Contract Administration and Office of Wage Standards, as well as funding for the Mayor's Office or another designated City agency to coordinate **a formal, public-**





health-focused response involving City agencies, service providers, labor organizations, and community partners.

The exact cost of these City responsibilities has not yet been determined. Our recommendation is that the City assess the staffing and operational needs of the responsible agencies, calculate those costs, and include them in its ongoing negotiations with LA28. Our April response specifically states that increased enforcement and coordination will require supplemental City resources, separate from the funding recommended for external community partners.

During the City Council discussion on the ECRMA, several concerns were raised about the City's financial responsibility for costs that may remain after the Games are over. We believe the same approach should be taken with human rights risks. **If the City does not invest in prevention before and during the Games, it may be left responding to trafficking, labor exploitation, displacement, and other harms after they occur.**

This is why prevention matters. Early worker outreach, enforcement of labor standards, monitoring of contracts, stronger compliance with trafficking posting requirements, and coordination between City agencies and community partners can help identify and address problems before they grow. Investing in these systems upfront can help reduce both the human impact and the costs that the City and local service providers may otherwise face later.

As the City and LA28 continue negotiating Venue Services Agreements and other operational agreements, we urge the City to:

- Identify the staffing and resources City agencies will need to carry out human rights and trafficking-prevention responsibilities;
- Calculate those costs and include them in negotiations with LA28;
- Ensure that City agencies are not expected to absorb these additional responsibilities using only existing staff and resources; and
- Build clear human rights responsibilities, prevention measures, worker protections, community-based responses, and accountability into the agreements that are still being negotiated.

Financial protections are an important part of planning for the Games. Human rights prevention should be treated as part of that same risk planning. Investing in prevention now can help protect workers and communities while reducing the likelihood that the City will be left responding to preventable harms later.

Thank you for your consideration.





Sincerely,

Paloma Bustos

Paloma Bustos, MSW

Policy Associate

[Sunita Jain Anti-Trafficking Initiative](#)

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Endnotes

1. Sunita Jain Anti-Trafficking Initiative and Arnold & Porter, [*Preventing and Addressing Human Trafficking Related to Major Sporting Events in Los Angeles: Recommendations for the 2026 World Cup and 2028 Olympics*](#), Loyola Law School, 2025.

2. Sunita Jain Anti-Trafficking Initiative, [*SJI Response and Recommendations to LA28 Draft Human Rights Strategy*](#), submitted to the Los Angeles City Council Ad Hoc Committee on the Olympics and Paralympics and LA28, April 21, 2026.





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



Preventing and Addressing Human Trafficking Related to Major Sporting Events in Los Angeles: *Recommendations for the 2026 World Cup and 2028 Olympics*



Preventing and Addressing Human Trafficking Related to Major Sporting Events in Los Angeles: Recommendations for the 2026 World Cup and 2028 Olympics¹

Executive Summary

A. Heightened Risks of Labor Trafficking. Major sporting events such as the Olympics and World Cup create heightened risks of labor trafficking and exploitation due in part to the rapid influx of capital, large-scale infrastructure projects, and demand for temporary labor and services. Host countries often accelerate construction timelines for venues, transportation, and accommodations, and the demand for cheap labor leads to reliance on vulnerable migrant or informal workers who face unsafe conditions, excessive recruitment fees, wage theft, or debt bondage. Simultaneously, the surge in tourism and hospitality needs increases the need for labor and heightens the risk of labor trafficking. Weak oversight, limited grievance mechanisms, and lack of formal prevention mechanisms can compound these vulnerabilities.

In practice, many of the most serious trafficking risks arise well before workers arrive at a job site. Recruitment processes—including the charging of illegal recruitment fees, misinformation about terms of employment, document retention, and debt-based coercion—are consistently the weakest link in labor supply chains associated with major events. Without proactive oversight of recruitment pathways and worker onboarding, downstream enforcement and audits are often too late to prevent harm.

¹ This report focuses specifically on anti-trafficking approaches in the context of major sporting events. However, a human rights framework requires a broader lens—one that addresses diverse safety needs, including sexual assault, domestic violence, wage theft, and hate crimes. To be comprehensive, these violations must be integrated into planning, prevention, and response efforts alongside trafficking. An example of this integrated approach is the work of No Traffick Ahead, which is developing a regional human rights strategy across the nine-county Bay Area. Its central initiative is **Safety4theBay.org**, a community resource navigator that connects individuals to support and services. More information about this navigator is available [here](#). Los Angeles could certainly develop an adopt such a tool as part of a comprehensive human rights plan.



Additionally, under current U.S. immigration policies, the risks surrounding major sporting events are intensified by heightened federal security and enforcement measures. The federal government has reportedly allocated \$1 billion to Olympic security, yet there is justified concern that these efforts will prioritize immigration enforcement—such as ICE raids—over addressing genuine threats. Funding for major sporting events typically flows to law enforcement response rather than to victim services and resources. In this climate of workplace raids, deportations, and expanded federal security, labor trafficking survivors are even less likely to come forward for help, making detection and intervention increasingly difficult.

B. Historic Overemphasis on Sex Trafficking. Major sporting events have been accompanied by disproportionate fears of increased sex trafficking. Studies have consistently shown no empirical evidence linking sporting events to spikes in sex trafficking.² Well-meaning but misguided enforcement campaigns have diverted resources by not focusing on effective trafficking prevention strategies and increasing access to services leading up to major sporting events.

C. Limited Advancements in International Human Rights Protections. The International Olympic Committee (IOC) and FIFA have only recently begun integrating human rights and labor protections into host city agreements. The 2026 World Cup is the first in which human trafficking and human rights considerations are required in planning by the host nations as laid out in FIFA's 2026 Human Rights Bidding Requirements. In 2020, Tokyo's Sustainable Sourcing Code was the first explicitly to prohibit forced labor within Olympic supply chains. These recent frameworks, as well as the Paris 2024 Human Rights Strategy, represent progress but remain insufficient to confront the practical realities of preventing trafficking.

D. Ongoing Deficiencies in Preventing Trafficking. To date, no FIFA human rights framework or Organizing Committees for the Olympic Games (OCOG) plan has directly addressed trafficking. Despite this, there have been documented instances of labor trafficking issues at every Olympics and World Cup over the last decade. The 2022 Qatar World Cup starkly illustrated the human costs of inadequate safeguards: thousands of migrant workers endured exploitative conditions akin to forced labor despite formal welfare standards. These failures underscore the urgency for robust, enforceable protections in Los Angeles's preparation for the 2026 and 2028 events.

E. Leveraging Upcoming Games to Establish California as a Global Leader in Anti-Trafficking Efforts. Although it can and should be strengthened, the existing legal framework in California—including provisions at both the City and County levels—provides a significant foundation that can be leveraged to prevent and reduce Human Trafficking in connection with major sporting events such as the World Cup and the Olympics.

² There is no empirical data demonstrating an increase in sex trafficking associated with major sporting events. Conflating a rise in online advertisements selling sex with evidence of trafficking is misleading; advertisements reflect marketing activity, not proof of increased exploitation. More broadly, research in this area is limited because it is difficult to reliably distinguish sex trafficking from consensual sex work, which constrains the accuracy of existing studies.



F. Key Recommendations and Strategic Priorities. This paper outlines below concrete measures to prevent and address human trafficking, including providing funding for those measures. To prevent and address trafficking at every stage of the Olympics and World Cup (organizational, delivery, and legacy phases), the City and County (working with and funded by, as appropriate, FIFA and the Los Angeles Organizing Committee for the Olympic and Paralympic Games 2028 (LA28)) should:

Education	Enforce State, County, and City Public Posting and Training Requirements
Procurement	Enforce Existing Procurement Standards with Focus on Sporting Event Contractors
Coordination	Coordinate Response Across Agencies and Local Service Providers to Increase Access to Services for Victims of Trafficking (While Avoiding Unintended Consequences of Law Enforcement Response, Especially from ICE)
Victim Fund	Fund Increased Hotline & Service Needs Through A Specialized Victim Fund
Investment	Fund Long-Term Real Change Through Innovative Investments
Evaluation	Fund Independent Evaluations of Human Rights and Anti-Trafficking Efforts



An Overview of Human Trafficking at Major Sporting Events

Laws around the world, including in Los Angeles County, have long been established to prevent Human Trafficking. Nevertheless, an estimated \$236 billion in illegal profits is generated annually from the Forced Labor of over 27 million people around the world.ⁱ

Forced Labor is associated with nearly every part of the economy,ⁱⁱ including major sporting events like the Olympics and the World Cup, which generate billions of dollars in revenueⁱⁱⁱ and have been associated with “sportswashing” human rights abuses within host countries.³ As the Olympics and the World Cup draw millions of in-person spectators to host cities and countries and often require significant development of stadiums and urban infrastructure, the risk of Forced Labor is particularly high within the construction, service, merchandise, and hospitality industries, as well as the supply chains associated with these events.^{iv}

“Human Trafficking” means a crime involving the exploitation of a person for labor, services, or commercial sex

“Forced Labor” (also known as Labor Trafficking) means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. 22 U.S.C. § 7102(11)(b). (Forced labor risks frequently manifest during recruitment and mobilization, particularly where labor brokers, agents, or informal intermediaries operate without transparency or accountability. Prevention efforts must therefore address both recruitment practices and conditions of work.)

“Sex Trafficking” means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age. 22 U.S.C. § 7102(11)(a).

³ Events like the Olympics offer a chance for the host country to gain prestige on the global stage. For countries in which human rights violations are occurring, hosting an event of this magnitude is an opportunity to draw the public eye away from these violations and focus on the success of the host nation, in what is known as “sportswashing.” Berlin 1936, Beijing 2008, and Sochi 2014, discussed below, are all examples of how dictatorial and anti-democratic regimes have employed the Olympics as means to attract global audiences, money, and prestige to their nations while quieting critical voices elsewhere.



The Olympics and Forced Labor

For over 20 years, Forced Labor has been a documented but unaddressed issue as countries and cities prepare for and host the Olympics:



2004 ATHENS OLYMPICS

Reports on construction for the 2004 Olympic Games describe worksites staffed largely by migrant workers from Eastern Europe and South Asia. Investigations documented minimal supervision, lack of protective equipment, and poor safety conditions. While the Greek government reported 14 worker fatalities, on-site observers asserted that the actual number was significantly higher—with estimates reaching up to 40 deaths across Olympic-related projects.

2008 BEIJING OLYMPICS

Reports concerning preparations for the 2008 Olympic Games indicate that migrant workers faced exploitative labor conditions, including long hours, unpaid wages, and absence of formal employment contracts. Due to the workers' lack of legal residency status in Beijing and lack of contractual documentation, they reportedly had no meaningful avenues for legal redress for labor violations.



2016 RIO OLYMPICS

According to reports on the 2016 Olympic Games, labor trafficking reached particularly high levels during the construction phase. In one documented case, eleven men were trafficked from other parts of Brazil to work on Olympic venues and the athletes' village. Reports state that the workers were not paid the promised wages and were housed in dilapidated, rat-infested buildings, exemplifying severe exploitation during the Games' preparation period.

2020 TOKYO OLYMPICS

A report from the global union federation Building and Wood Workers' International (BWI) detailed extensive alleged labor rights violations during construction of Tokyo 2020 Olympic facilities. The report found low wages, excessive overtime, and weak grievance mechanisms, contributing to a pervasive "culture of fear." Workers at the Olympic Village reported being required to work 26–28 consecutive days.



2024 PARIS OLYMPICS

Reports and testimonies from undocumented migrant workers involved in building infrastructure for the 2024 Olympic Games reveal significant labor rights violations. French labor inspectors (URACTI) found in a March 2022 inspection that one in six workers at an Olympic construction site was undocumented, with many reportedly required to work outside the protections of French labor law.



Despite years of advocacy and mounting evidence, the International Olympic Committee (IOC) and host cities have failed to meaningfully address Human Trafficking risks associated with the Olympics.^v Only in recent years have host city contracts and bidding rules begun to reference human rights at all—and even then, express references to forced labor and trafficking have been largely absent.

Prior to 2020, host city or organizing committees rarely published standalone human rights plans. Human rights concerns were raised almost exclusively by non-governmental organizations, not embedded in binding commitments. While some bid documents and legislation included vague assurances, no dedicated implementation plans existed.

Growing public demand prompted incremental steps. Ahead of the Tokyo 2020 Olympics, “Guidelines for Safeguarding Human Rights at the Venues” were introduced, and in 2023 the Paris 2024 Human Rights Strategy pledged alignment with the UN Guiding Principles on Business and Human Rights. Yet neither document mentioned human trafficking or forced labor, nor did they establish enforceable mechanisms to prevent it.⁴ Only Tokyo’s 2020 sourcing guidelines explicitly referenced forced labor—and even then, they remained voluntary guidelines without concrete enforcement.^{5, vi}

Looking ahead to the games in Los Angeles, human rights and anti-trafficking goals are embedded for the first time in the governance documents through the IOC’s Strategic Framework and the LA28 Impact and Sustainability Plan. LA28 has adopted a Responsible Sourcing Code, requiring suppliers and contractors to adhere to labor-rights standards and prohibit trafficking, with compliance clauses in RFPs, internal training, and a sustainability management system for oversight.^{vii} The IOC’s Human Rights Advisory Committee adds independent monitoring. Thus, 2028 is Los Angeles’s chance to be a global leader in demonstrating practical steps a host City and County can take to prevent trafficking leading up to and during the Olympics as implementation and enforcement is largely left to the host.

⁴ Several earlier initiatives touched on labor rights but failed to confront trafficking directly. The Paris 2018 Social Charter promoted decent work and inclusive procurement. Tokyo’s 2019 Sustainable Sourcing Code prohibited suppliers from engaging in forced labor or trafficking and banned abusive practices such as withholding wages, excessive hours, passport confiscation, and deposit schemes.

⁵ Two years later, in 2022, the IOC’s “Strategic Framework on Human Rights” committed to integrating due diligence across procurement and host-city relations but still failed to mention human trafficking. IOC Strategic Framework on Human Rights (Sept. 2022), <https://stillmed.olympics.com/media/Documents/Beyond-the-Games/Human-Rights/IOC-Strategic-Framework-on-Human-Rights.pdf>.



The World Cup and Forced Labor

The World Cup similarly has a long history of overlooking trafficking risks:

2010 - South Africa

Trade unions noted labor abuses linked to construction projects that required labor strikes to resolve



2014 - Brazil

Trade unions noted labor abuses linked to construction projects that required labor strikes to resolve; eight workers lost their lives building stadiums; government agencies rescued over one-hundred workers from slavery-like conditions during expansion of an airport



2018 - Russia

Exploitation of construction workers included unpaid wages, unsafe working conditions, and lack of employment contracts



2022 - Qatar

Thousands of foreign workers involved in infrastructure projects died as a result of abusive practices



For years, FIFA's governance relied on broad human rights commitments without concrete protections against trafficking or forced labor. In 2017, FIFA pledged to respect the International Bill of Human Rights and the International Labour Organization's core labor standards under the UN Guiding Principles on Business and Human Rights.^{viii} The Sustainability Strategy for the 2018 World Cup in Russia included a joint plan with the local organizing committee that provided for labor inspections by the Building and Wood Workers' International.^{ix} Yet these measures were limited in scope and failed to establish enforceable mechanisms to prevent trafficking.

The 2022 international outcry over labor trafficking and human rights violations in Qatar finally forced FIFA to add a human rights component to its host selection process. FIFA has now embedded human rights goals, including labor rights, into the governance of the 2026 World Cup.^x Its Human Rights Policy and World Cup 2026 Sustainability and Human Rights Strategy establish mandatory due diligence and grievance procedures aligned with the UN Guiding Principles. Under the FWC26 Human Rights Framework, "forced labor and child labor is strictly prohibited and adequate measures are taken, individually and collectively, to prevent and sanction labor trafficking in relation to goods, services or procurement connected to the hosting and staging of the FIFA World Cup."^{xi} The framework further provides encouragement to implement targeted actions to address these issues, including:

- Preventing forced labor trafficking and child labor;
- Due diligence for potential high-risk procurements;
- Using a survivor-informed approach to identifying, combatting, and remedying forced labor trafficking; and
- Confidential procedures for reporting incidents of such prohibited conduct.

The 2026 FIFA World Cup therefore presents Los Angeles with an additional concrete opportunity to set enforceable standards and demonstrate accountability in practice. By implementing practical anti-trafficking prevention measures, Los Angeles can show how a host City or County can move beyond aspirational frameworks to real protections for workers. This moment is not only about hosting a global sporting event—it is about proving that mega-events can be organized without perpetuating Forced Labor or trafficking.

Sex Trafficking and Major Sporting Events

It is important to remember that Sex and Labor Trafficking are always present in cities hosting major sporting events. The increased awareness of Human Trafficking that comes with high-profile events like the Olympics, the World Cup, and the Super Bowl can have a positive impact and should be harnessed to address all forms of Human Trafficking in the long term. But, particularly as to Sex Trafficking, host cities must ensure that any measures they take do not rely on unconfirmed evidence and are structured to mitigate unintended consequences from criminal enforcement.

Since at least 2004, the Olympics and the World Cup have been associated with awareness campaigns concerning Sex Trafficking. However, there is no empirical data demonstrating that major sporting events lead to an increase in Sex Trafficking. Nevertheless, Sex Trafficking has



been the sensationalized focus of media, government agencies, and non-profit organizations in the leadup to and during major sporting events. For instance, fears of increased Sex Trafficking—including wild speculation that as many as tens of thousands of women and children might be sex trafficked—at the 2004 Olympics in Athens,^{xii} 2006 World Cup in Germany,^{xiii} 2010 Olympics in Vancouver,^{xiv} 2010 World Cup in South Africa,^{xv} 2014 World Cup in Brazil, and 2016 Olympics in Rio de Janeiro^{xvi} all proved to be unfounded. Sex Trafficking has also been strongly associated with the NFL Super Bowl in the media for many years despite the fact that research has not found supporting data for an increase in sex trafficking related to the Super Bowl.^{xvii}

This outsized focus on Sex Trafficking has had negative consequences, including diverting the focus and resources from Forced Labor risks related to major sporting events.^{xviii} Raids and crackdowns on sex workers by authorities preceding and during major sporting events also traumatized and criminalized both victims of sex trafficking and sex workers who are not being trafficked. In the leadup to the 2012 Olympic Games in London, for instance, authorities were criticized for endangering sex workers in targeted efforts to “clean up” the city. Despite legitimate concerns over conditions for migrant workers as the city prepared for the games, the media focused on fears of increased commercial sex and sex trafficking related to the event.^{xix} In another example, reports documented that Brazilian sex workers and others were negatively affected in the lead up to the 2014 World Cup and the 2016 Olympics as a result of the focus on Sex Trafficking.^{xx}

As Los Angeles prepares to host major sporting events, the City and County have a critical opportunity to raise awareness and establish a protective framework against Human Trafficking grounded in evidence-driven data. Sex and labor trafficking are not temporary phenomena tied only to high-profile gatherings—they are persistent realities in every city. The heightened visibility that accompanies events like the Olympics and the World Cup can and should be harnessed to build lasting awareness and systemic responses to all forms of trafficking. Importantly, this work must avoid the unintended consequences that have too often accompanied past sporting events, where unverified claims and a narrow focus on Sex Trafficking overshadowed broader realities. By centering research, survivor expertise, and comprehensive strategies, Los Angeles can set a precedent for responsible and enduring anti-trafficking leadership around major sporting events.



Upcoming Major Sporting Events in Los Angeles: 2026 World Cup and 2028 Olympics

Within the next three years, Los Angeles will host both the 2026 World Cup and the 2028 Olympics. As the City and the County prepare for these major sporting events, they and other stakeholders must work diligently to prevent and address trafficking in all phases of these events—organization, delivery, and legacy.⁶ These events also present the City and County with the opportunity to raise awareness of Human Trafficking and better protect Human Trafficking victims. This paper outlines below concrete measures to prevent and address Human Trafficking, including enforcing existing anti-trafficking mechanisms and specific funding recommendations. If implemented by the City and County, these measures would amount to a first-of-its-kind comprehensive response to address Human Trafficking at major sporting events that could serve as a starting place for other cities and countries to adopt and expand on in the future.

Note that these recommendations do not intend to propose a comprehensive human rights plan, which must also be developed to address the broader safety and social harms that accompany major sporting events.

Proposed Human Trafficking Measures and Strategic Implementation Suggestions for the City and County

To prevent and address trafficking at every stage of the Olympics and World Cup (organizational, delivery, and legacy phases), the City and County (working as appropriate with FIFA and LA28) should:

1. Enforce State, County, and City Public Posting and Training Requirements
2. Enforce Existing Procurement Standards with Focus on Sporting Event Contractors
3. Coordinate Response Across Agencies and Local Service Providers to Increase Access to Services for Victims of Trafficking (While Avoiding Unintended Consequences of Law Enforcement Response, Especially from ICE)
4. Fund Increased Hotline & Service Needs Through a Specialized Victim Fund
5. Fund Long-Term Real Change Through Innovative Investments
6. Invest in Evaluation of Impact

⁶ For purposes of this white paper, the “organization phase” refers to the planning and construction stage before the event; the “delivery phase” refers to the operations stage during the event itself; and the “legacy phase” refers to the long-term social, economic, and other impacts and programs after the event ends.





Recommendation #1:



Enforce State, County, and City Public Posting and Training Requirements

As the County's Department of Consumer and Business Affairs recently observed in its 2024 report on Reimagining Los Angeles County's Approach to Human Trafficking, "[t]o successfully reduce and eliminate [Human Trafficking] in any community, that community must have an awareness and understanding of [Human Trafficking]."^{xxi} Accordingly, a key component of addressing Human Trafficking, including Forced Labor, prior to and during any major sporting event within Los Angeles County is to maximize the use of all tools to educate stakeholders of the threat of Human Trafficking and the avenues available to address it. These existing educational tools include:

Posting Requirements

- **City of Los Angeles (2020):**
 - Los Angeles Municipal Code, Chapter V, Article 9, Section 59.00 ("Notices Related to Slavery and Human Trafficking")
 - Requires 13 specified businesses and establishments to post notices with information on human trafficking and available resources. These include: 1. On-sale premises licensees, 2. Adult or sexually oriented businesses, 3. **Primary airports**, 4. **Intercity passenger rail or light rail stations**, 5. Bus stations, 6. Truck stops, 7. Hospital emergency rooms, 8. Urgent care centers, 9. Farm labor contractors, 10. **Privately operated job recruitment centers**, 11. Roadside rest areas, 12. Massage or bodywork establishments, 13. **Hotels, motels, and bed-and-breakfast inns**.
 - Enforcement: A civil penalty of one thousand dollars (\$1,000) for a first offense and two thousand dollars (\$2,000) for each subsequent offense.
- **Los Angeles County (2021):**
 - Los Angeles County Code Title 13, Chapter 13.110
 - In addition to the 13 posting requirements in the City's municipal code (see above), requires 13 additional posting requirements in unincorporated areas of the County. These include: 1. Skilled nursing facilities, 2. Barbershops, hair salons, and nail salons, 3. Gas stations, 4. Retail stores selling food or household goods, 5. Shelters including domestic violence and homeless shelters, 6. Primary and reproductive/sexual health service providers, 7. **Garment manufacturing establishments**, 8. Warehouses or storage facilities for commercial goods, 9. **Construction sites for multi-family, commercial, or mixed-use developments**, 10. **Janitorial or building maintenance businesses**.
 - Enforcement: Administrative fines: Up to \$1,000 per violation, per day, after a 30-day correction period; Civil penalties: Up to \$2,500 per violation, per day, plus



possible injunctions through civil action; Misdemeanor prosecution: Fine up to \$1,000, or up to 6 months in County Jail, or both.

- **State of California (2024):**
 - Cal. Civ. Code § 52.66
 - Requires ticket sellers for sporting venues and arenas to include human trafficking information in electronic tickets.
 - This leverages mobile ticketing technology to deliver awareness directly to attendees at events like the Olympics and World Cup.

Training Requirements

- **Los Angeles County (2021):**
 - Los Angeles County Code Title 13, Chapter 13.110.070
 - Requires 26 listed businesses to show employees a 20-minute training video produced by the U.S. Department of Homeland Security.
 - Enforcement: Administrative fines, up to \$1,000 per violation, per day, after a 30-day correction period; Civil penalties, up to \$2,500 per violation, per day, plus possible injunctions through civil action; Misdemeanor prosecution, with fine up to \$1,000, or up to 6 months in County Jail, or both.
- **State of California (2018):**
 - Cal. Gov. Code § 12950.3 / SB 970 (2018)
 - Requires hotel and motel employees to receive at least 20 minutes of human trafficking awareness training.
 - Cal. Civ. Code § 52.6(e)–(f) / AB 2034 (2018)
 - Requires transit operators and employees in specified transportation sectors to receive similar training.

Recommendation #1A: Prioritize Outreach and Enforcement Efforts to Ensure Posting and Training At All Required Locations on Human Trafficking

The City and County should ensure that all City and County employees and others working on the upcoming Olympics and World Cup are fully informed of these existing notice and posting requirements. Notices and postings required by both the City and County can and should be tailored to each major sporting event, particularly in the business and establishments **bolded** above. Dissemination of information to the 26 categories of businesses required to post notices in Los Angeles County, and the 13 categories required in the City of Los Angeles, should begin immediately. These reminders should emphasize both the existing posting requirements and their heightened importance in light of upcoming major sporting events.



Within three months of providing this additional notice, City and County officials should increase and publicize enforcement efforts, including the collection of fines authorized for failure to post.

Notices should also be sent to transit operators, hotels, and the 26 categories of businesses in Los Angeles County that are obligated under state and local law to ensure all employees have documented completion of the required 20-minute training. Similarly, three months after these reminders are issued, City and County officials should intensify enforcement actions against non-compliance.

Finally, ticket vendors should immediately receive notices from City and County Agencies outlining the requirements of Cal. Civ. Code § 52.66 to place information on electronic tickets sold in connection with Olympic and World Cup events and asking them to follow up by reporting draft language to the City and County prior to electronic tickets being sent. If tickets have already been provided, the City and County should require updated tickets with the required language under California law be re-sent.

Recommendation #1B: Fund Additional Public Awareness Efforts

FIFA and LA28 should provide funding for a public awareness campaign to launch six months prior to each major sporting event. The campaign should highlight the connection between Human Trafficking and global sporting events, while increasing public understanding of how trafficking occurs and how to report it. It must provide information for a non-governmental, local hotline that the public and potential survivors can call for resources and help.

Rationale:

Such funding would strengthen business compliance with existing City and County posting requirements (for example, encouraging the public to look for mandated notices and reach out for help) and ensure that awareness reaches millions of spectators, workers, and community members across Los Angeles. By investing in prevention through education, FIFA and LA28 can demonstrate global leadership in safeguarding human rights and set a precedent for responsible hosting of major events.

NGOs with proven expertise are already positioned to lead this work. Local campaigns, such as No Traffick Ahead, which focused on the Bay Area, have also been developed. Campaigns such as these include survivor-informed campaign message development and production, multilingual printed materials, public-facing PSA film / athlete ambassador usage, paid media amplification, stipends for frontline lived-experience contributors, relevant trainings for businesses and services (hospitality, tourism, transport), and additional hotline reporting.

With targeted funding provided by FIFA and LA28, organizations like No Traffick Ahead could scale their campaigns in Los Angeles to meet the unique challenges and opportunities



presented by these events, ensuring that awareness efforts are evidence-based, survivor-centered, and locally resonant.

Cost Estimate:

Funding should be \$200,000 to \$300,000 for each campaign (one for World Cup and one for Olympics).⁷



Recommendation #2:



Enforce Existing Procurement Standards with Focus on Sporting Event Contractors

Existing procurement measures and standard contract language provide an opportunity for the City and County to prevent and reduce Human Trafficking. Although these mechanisms provide a framework, the City and County need to fully leverage their procurement power to robustly combat Human Trafficking related to the major sporting events and long-term.

In its 2024 report to the City Council regarding Protocols Against Forced Labor in City Procurement,^{xxii} the Los Angeles City Procurement Officer and Bureau of Contract Administration concluded that, although the City administers an ordinance that prohibits sweatshop working conditions for the City's commodities contractors, it was "likely" that in light of the \$4.5 billion annually in the City's procurement contracts, goods and services that are procured by the City "have been used towards forced labor whether it be in the production of purchased goods or planting and harvesting of raw materials to produce the purchased goods." In a 2025 report backed by the Los Angeles County Board of Supervisors, the county Internal Services Department highlighted that the County lacks a Board policy explicitly prohibiting contractors from engaging in human trafficking, but service contracts included a general Zero Tolerance provision.^{xxiii} Thus although these City and County level policies could be strengthened (and recent such recommendations to do so should be implemented), existing legal mechanisms could be better enforced with particular focus on Olympic- and FIFA-related contracts (including contracts in which LA28 might be the contracting party) including:

- **Los Angeles City (2005):**
 - Los Angeles Charter, Div. 10, Article 17, Sec. 10.43 (2005) ("Sweat-Free Procurement Ordinance")
 - Defines forced labor to include child labor, slave labor or any similar practice of forcing individuals to perform services or work performed by a person for a company that habitually violates laws governing wages, employee benefits, occupational health and safety, non-discrimination or freedom of association. Sec. 10.43.1.

⁷ For comparison, in 2020, the Santa Clarita Transportation Authority received \$350,000 from the U.S. Department of Transportation to conduct training and implement a public awareness campaign around human trafficking limited to the transportation system. Valley Transportation Authority, *Federal Grant Augments VTA Efforts to Combat Human Trafficking* (Jan. 28, 2020), www.vta.org/blog/federal-grant-augments-vta-efforts-combat-human-trafficking.



- Seeks to eliminate the use of sweatshop providers by requiring contractors that provide “equipment, goods, materials and supplies” over \$25,000 to sign a contractor code of conduct that acknowledges their compliance with human and labor rights and labor obligations. Sec. 10.43.2, 10.43.3.
 - Enforcement: Department of General Services can impose various remedies ranging from additional training to termination of contract and imposing penalties of up to 20% of value of contract. Sec. 10.43.5.
- Los Angeles Municipal Code Sections 187 and 188
 - Require payment of minimum hourly wage and providing certain other benefits (such as sick time).
 - Enforcement: Labor Compliance Program (LCP) monitors and enforces prevailing wage requirements to ensure that all public works contractors are paying workers the appropriate wage; LCP staff proactively reviews payrolls, conducts site visits, and investigates all worker complaints.^{xxiv}
- **Los Angeles County:**
 - Zero Tolerance Policy on Human Trafficking
 - Model contract 8.53 “Compliance with County’s Zero Tolerance Policy on *Human Trafficking*,”^{xxv} provides:

Contractor acknowledges that the County has established a Zero Tolerance Policy on Human Trafficking prohibiting contractors from engaging in Human Trafficking.

If a Contractor or member of Contractor’s staff is convicted of a human trafficking offense, the County will require that the Contractor or member of Contractor’s staff be removed immediately from performing services under the Contract. County will not be under any obligation to disclose confidential information regarding the offenses other than those required by law.

Recommendation #2A: Enforce County and City Existing Human Trafficking Procurement Policies with Focus on Sporting Event Contractors

The City and County should, at a minimum, ensure robust enforcement of the existing procurement measures outlined above, focusing on contractors and contracts related to the Olympics and the World Cup.

Recommendation #2B: Quickly Adopt IDS Proposed Updates to LA County Procurement Policy with LA City Adopting Mirroring Protections

In response to a motion introduced by Supervisor Holly J. Mitchell on Preventing Human Trafficking in the Wake of Natural Disasters,^{xxvi} the Los Angeles County Internal Services



Department (ISD) and the Department of Consumer and Business Affairs (DCBA) have released reports suggesting changes to the procurement practices of the County to further address Human Trafficking.^{xxvii} These include expanded worker education and outreach efforts, plans for additional Human Trafficking training, and updates to the County's Zero tolerance policy on Human Trafficking Procurement to strengthen accountability among vendors and contractors. Those suggested changes have not yet been fully implemented.^{xxviii} The County should follow the recommendations of the ISD and update its policies by December 2026, and the City should implement equivalent measures.

Indeed, robust procurement practices have been proven to be effective at the federal level, and the County and City should strive to follow that model. LA28 (to the extent it is a contracting party) should do the same. Federal procurement policies have been effective in preventing Human Trafficking by initiating over 180 investigations into Forced Labor within federal contracts between 2017 and 2023. These investigations led to corrective actions (such as suspensions, debarments, and compliance agreements), ensuring better protection for workers. As a result of these policies, only one federal contract was reportedly terminated in those eight years, highlighting the success of the measures in maintaining ethical practices.^{xxix} Adoption by the City, County, and LA28 of similar policies would enhance these efforts due to the large procurement expenditures by these entities, requiring businesses to adopt explicit ethical practices to apply for and continue City and County (and LA28) contracts.

Recommendation #2C: Enforce Sweat Shop Ordinances

The Fair Games Coalition has called for LA28 to ensure union jobs that support families through living wages and the "safe and dignified treatment of immigrant communities."^{xxx} These actions prevent trafficking. Therefore, in addition to ensuring enforcement of its zero policy tolerance of trafficking, the City should also ensure robust enforcement of its ordinances, including ensuring that contractors and contracts related to the Olympics and the World Cup pay prevailing wages to their employees.

Recommendation #2D: FIFA and LA28 Should Pay for and Publish an Independent Audit of Contracts Related to Sporting Events

FIFA and LA28 should provide funding for independent, worker-led workplace audits of contracts tied to supporting the World Cup and Olympics. These audits must be published to ensure transparency⁸ and accountability.

⁸ Funding and conducting audits of game-related contracts should be considered a minimum baseline investment. As FIFA and LA28 work to strengthen their human rights strategies to combat Human Trafficking, additional measures could include:

- Supporting the implementation of a Human Rights Due Diligence (HRDD) process throughout the events, including spot checks, worker interviews, grievance intake and referral systems, and capacity building for contractors and stakeholders.
- Developing guidance on supplier, provider, and facility screening for major sporting events to ensure ethical sourcing and reduce human and labor rights risks at scale.



Rationale:

To safeguard workers during the World Cup and Olympics, independent audits are essential to uncover hidden risks in subcontracting networks and identify violations such as wage theft, recruitment fees, and unsafe conditions. NGOs with expertise in supplier and workplace assessments—such as Verité^{xxxi}—can center worker voices and ensure that findings reflect lived experiences. Publishing audit results would strengthen compliance with procurement requirements, increase accountability for sponsors and contractors, and set a global precedent for responsible hosting of sporting events.

Cost Estimate:

Comprehensive worker-led audits range from \$10,000–\$20,000 per audit, depending on the depth of worker interviews and subcontractor mapping. Priority audits should include 15-20 audits for each event (World Cup and Olympics), and include contracts related to construction, janitorial/maintenance, catering, security, and merchandising. The timing of the audits should range from review of contractor work in the lead-up to the events (9-36 months prior to the events), as well as audits of work done immediately prior to and during the events.⁹

The total investment would likely fall between \$150,000–\$400,000 per event cycle for a total of \$300,000–\$800,000. FIFA and LA28 should each contribute \$75,000–\$200,000 per event cycle, ensuring that the most vulnerable workers are protected and that Los Angeles sets a model for transparent, responsible event hosting.



Recommendation #3:



Coordinate Response Across Agencies and Local Service Providers to Increase Access to Services for Victims of Trafficking (While Avoiding Unintended Consequences of Law Enforcement Response, Especially from ICE)

Recommendation #3A: Coordinate Response by City and County Agencies for a Public Health Approach

The City and County must coordinate a public health-centered response to Human Trafficking across agencies in preparation for upcoming global sporting events. This approach should prioritize the protection of vulnerable communities and the delivery of survivor-centered services, rather than relying on punitive, law enforcement-driven strategies. Coordination should also formally include major employers, labor suppliers, and recruitment partners involved

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- Transferring learnings and skills to the Olympics and FIFA process through training and capacity building to proactively address risks before major sporting events.

⁹ Note that, while independent audits are essential, experience shows they are most effective when combined with ongoing worker-level engagement rather than point-in-time assessments. Continuous mechanisms that allow workers to confirm recruitment conditions, employment terms, and well-being over time significantly strengthen the credibility and impact of audit findings.



in delivering services for the events. Without employer participation, early warning signs of exploitation often remain invisible to public agencies until harm has already occurred.

Rationale:

A public health framework avoids the unintended and harmful consequences that enforcement-focused responses have historically produced, particularly against sex workers and marginalized groups during major sporting events (*see supra* Part I). This is especially critical given the scale of federal security investments tied to the Olympics and World Cup, and the justified concerns raised by immigrant rights groups and unions about enforcement actions targeting Los Angeles's most vulnerable communities. By centering prevention, harm reduction, and access to services, the City and County can mitigate risks, strengthen trust with affected populations, and ensure that anti-trafficking efforts do not inadvertently perpetuate fear or abuse.

Implementation:

Beginning six months prior to each major sporting event, government agencies should convene monthly coordination meetings to develop strategies, align action plans, and monitor enforcement efforts. These meetings must include public health officials, social service providers, immigrant rights advocates, and survivor-led organizations to ensure a comprehensive, community-driven response.

The Mayor's Office should convene these meetings. Agencies who should be required to send members to these monthly meetings must include:

- Office of the Mayor (mayor.lacity.gov),
- LA City Emergency Management Department (emergency.lacity.gov),
- LA City Office of Wage Standards (wagesla.lacity.gov),
- LA City Department of Public Works (dpw.lacity.gov),
- LA City Bureau of Contract Administration (bca.lacity.gov),
- LA City Community Investment for Families Department (communityinvestment.lacity.gov),
- LA County Department of Public Health (publichealth.lacounty.gov),
- LA County Department of Consumer and Business Affairs (dcba.lacounty.gov), including the Office of Labor Equity
- LA County Office of Immigration Affairs (oia.lacounty.gov), and
- LA County Office of Emergency Management (ceo.lacounty.gov/emergency-management).

Recommendation #3B: To Prevent Human Trafficking, the Rights of Immigrants and Workers Must be Safeguarded

As Los Angeles prepares to host the 2026 World Cup and the 2028 Olympics, unions and immigrant rights groups are urging strong safeguards to protect workers and immigrants in light of heightened federal enforcement and expanded federal security during the games. These



protections must be formally incorporated into the Games' Human Rights Action Plans and negotiated MOUs with federal agencies.

Required Safeguards in MOUs:

- Protection from Enforcement: Secure guarantees from ICE and CBP that no raids or arrests will occur near venues, and ensure event security is separated from immigration enforcement to prevent fear and rights abuses.
- Non-Discrimination: Establish policies prohibiting racial profiling, arbitrary detention, and restrictions on freedom of expression or peaceful protest.
- Community Involvement: Guarantee close collaboration with unions, immigrant rights groups, and anti-trafficking NGOs to design, implement, and monitor protections.

Cost Estimate:

To implement these safeguards effectively, NGOs will require resources for legal monitoring and community engagement at a cost of \$150,000 for each event. FIFA and LA28 should each contribute \$150,000 to ensure adequate funding and accountability.



Recommendation #4:



Fund Increased Hotline & Service Needs Through a Specialized Victim Fund

Recommendation #4A: Increase Funding for Local NGO Hotline

FIFA and LA28 should provide additional funding to strengthen the specialized human trafficking hotline operated by the Coalition to Abolish Slavery & Trafficking (CAST) in Los Angeles. As the City and County prepare for the World Cup and Olympics, hotline capacity must be expanded to address increased risks of trafficking and labor exploitation, as well as heightened public awareness efforts. Hotline data and service-provider insights should be systematically fed back into prevention efforts, including procurement oversight and contractor monitoring so that recurring risks can be addressed structurally rather than reactively.

Rationale:

CAST already operates a trusted hotline serving survivors, but call volumes are expected to rise with the influx of temporary workers and vulnerable migrants. Expanded awareness campaigns around human trafficking during the games will also generate more referrals from workers, community members, and service providers, further increasing demand on hotline staff. To ensure timely response, multilingual access, and survivor-centered referrals, CAST requires supplemental funding to expand staffing, technology, and outreach.

Cost Estimate:

The estimated cost to sustain and scale the hotline is \$500,000 during the lead-up to and during the games, covering trained advocates, extended hours, and translation services. FIFA and



LA28 should each contribute \$250,000, ensuring Los Angeles has the infrastructure needed to prevent trafficking and protect workers during these global events.

Recommendation #4B: Provide Additional Money and Resources for Victim Fund

FIFA and LA28 should provide dedicated funding to establish and expand a Victim Fund to support anti-trafficking services in Los Angeles during the World Cup and Olympics. Funding must begin two years prior to each event and continue throughout the games to meet increased demand.

Rationale:

Services for Human Trafficking survivors have historically been underfunded. With expected increases in labor trafficking and reporting and attention to all forms of trafficking during major sporting events, service providers will face heightened demand for outreach, collaborative efforts, and preventive activities. Los Angeles County already has a trusted network of specialized providers—including the Coalition to Abolish Slavery & Trafficking (CAST), Thai CDC, YMCA, and other community-based social and legal services organizations—that can deliver survivor-centered services. Allowing these and other specialized anti-trafficking providers to apply for funding in advance will ensure they can staff needs, while permitting additional funding requests during the events themselves will guarantee flexibility to meet urgent needs.

Cost Estimate:

Funding should be sufficient to cover expanded outreach, housing, case management, and legal services. The estimated range for these services is \$1,000,000–\$2,000,000 over the three-year cycle for each major sporting event. At least \$1,000,000 each in funding should be provided directly by FIFA and LA28 to ensure accountability and adequate resourcing for survivor services.



Recommendation #5:



Fund Long-Term Real Change Through Innovative Investments

In addition to the specific areas for funding identified above, FIFA and LA28 should establish a separate dedicated funding pool to which local organizations and government agencies can apply to obtain the resources needed to implement creative ideas to prevent and address trafficking during major sporting events. These funds should be designed to support projects that lead-up to and during the 2026 World Cup and 2028 Olympics.

Rationale:

To effectively prevent trafficking around major sporting events, FIFA and LA28 must also invest and foster innovation and evidence-based strategies tailored to the unique challenges of global sporting events. Major events like the World Cup and Olympics create complex labor supply chains, heightened migration, and increased risks of exploitation. Addressing these realities requires more than traditional service delivery and enforcement efforts—it demands creative



approaches grounded in research and proven practices, such as worker-led monitoring, multilingual outreach campaigns, survivor-centered technology solutions, and community-driven prevention models.

Given the limited resources available to local agencies and NGOs, FIFA and LA28 must provide direct funding to ensure adequate capacity and encourage innovation. Two separate pools of funds should be created:

- Prevention & Innovation Pool. Available up to two years in advance of each event to pilot projects that test new evidence-based strategies. Eligible projects should include worker-facing tools that provide clear information on rights, recruitment conditions, and grievance pathways, as well as systems that enable ethical employers to demonstrate compliance through verifiable worker feedback.
- Crisis Response Pool. Available before, during, and immediately after the events to fund rapid interventions, emergency services, and adaptive solutions that respond to real-time trafficking risks.

This additional funding structure ensures that resources are not only sufficient but also flexible and forward-looking, empowering organizations to design creative, research-driven initiatives that prevent trafficking and protect vulnerable workers during sporting events that can be replicated at future venues.

Cost Estimate:

The pools should be funded at \$1,000,000 by FIFA and \$1,000,000 by LA28.



Recommendation #6:



Fund Independent Evaluations of Human Rights and Anti-Trafficking Efforts

FIFA and LA28 should allocate funding to support independent evaluations of all human rights and anti-trafficking initiatives implemented in connection with the 2026 World Cup and 2028 Olympics. Evaluations should be conducted by trusted research institutions and made publicly available.

Rationale:

Major sporting events bring heightened risks of trafficking, worker exploitation, and immigrant rights violations. While funding for hotlines, victim services, and safeguards is essential, it is equally critical to assess whether these measures have been effective. Independent evaluations will provide evidence of outcomes, identify gaps, and generate lessons that can strengthen future events. Evaluations should explicitly assess recruitment practices and worker onboarding experiences, including whether workers incurred recruitment debt, understood their employment terms, and had safe avenues to raise concerns.

Evaluations should include:



- Impact Assessment. Measuring the reach and effectiveness of hotlines, victim services, procurement policies, and outreach campaigns.
- Compliance Review. Assessing whether MOUs with federal agencies and non-discrimination policies were upheld.
- Community Feedback. Gathering input from unions, immigrant rights groups, NGOs, and survivors to ensure protections were meaningful.
- Legacy Planning. Documenting how investments created lasting infrastructure in Los Angeles beyond the events.

Cost Estimate:

Independent evaluations should be funded at \$500,000 per event cycle (a total of \$1 million), with FIFA and LA28 each contributing half of that sum. This modest investment will ensure accountability, transparency, and credibility, while reinforcing the legacy of human rights protections tied to global sporting events.



Conclusion

The World Cup and Olympics generate **billions of dollars in revenue**.^{xxxii} Against this backdrop, an investment of **just \$2.75 – \$3.1 million per organizing body**—far less than one percent of projected FIFA and Olympic revenues—is a **minimal cost** to prevent trafficking, protect workers and immigrants, and strengthen human rights infrastructure. This is particularly true in light of LA28 currently predicting a surplus/profit from the Olympic games.^{xxxiii}

This modest funding ensures that Los Angeles not only hosts safe and celebratory games but also leaves behind a **lasting legacy of justice and dignity**. By committing to these investments, FIFA and LA28 can demonstrate that global sports are not only about competition and spectacle, but also about **human rights leadership**.



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.

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Appendix A

Recommendation	Summary of Purpose	Estimated Total Cost	FIFA Contribution	LA28 Contribution
#1B: Fund Public Awareness Campaigns	Launch awareness campaign six months prior to events; education, compliance, outreach	\$400,000-\$600,000	\$200,000-\$300,000	\$200,000-\$300,000
#2D: Fund and Publish Independent Audits of Event-Related Contracts	Worker-led audits of stadiums, hotels, transit hubs, and service contractors	\$300,000-\$800,000	\$150,000-\$400,000	\$150,000-\$400,000
#3B: Safeguard Immigrant & Worker Rights	Legal monitoring, community engagement, MOUs with ICE/CBP	\$300,000	\$150,000	\$150,000
#4A: Fund Increased Access to Local Anti-Trafficking Hotline (CAST)	Expand hotline capacity, staffing, multilingual services, outreach	\$500,000	\$250,000	\$250,000
#4B: Victim Fund for Service Providers	Support survivor services (housing, case management, legal aid, outreach)	\$1,000,000-\$2,000,000	\$500,000-\$1,000,000	\$500,000-\$1,000,000
#5: Funding Pools for Innovative Anti-Trafficking Initiatives	Creative outreach, prevention campaigns, crisis intervention	\$2,000,000	\$1,000,000	\$1,000,000
#6: Fund Independent Evaluations of Human Rights & Anti-Trafficking Efforts	Independent research, compliance review, community feedback, legacy planning	\$1,000,000	\$500,000	\$500,000

- **Total Investment Needed:** \$5.5 million – \$6.2 million
- **FIFA Total:** \$2.75 million – \$3.1 million
- **LA28 Total:** \$2.75 million – \$3.1 million



Appendix B

FIFA's projected revenue for the 2026 World Cup is **\$8.9–\$11 billion**, while the Los Angeles 2028 Olympics are expected to generate **\$13–\$17 billion** for the Southern California economy. Against these totals, the proposed **\$2.75 million investment by FIFA and \$2.75 million by LA28** represents **approximately 0.025%–0.031% of FIFA's revenues** and **0.016%–0.021% of Olympic revenues**.

Event	Projected Revenue	Proposed Investment	% of Revenue
FIFA World Cup 2026	\$8.9–\$11 billion	\$2.75 million	~0.025–0.031%
Los Angeles Olympics 2028	\$13–\$17 billion	\$2.75 million	~0.016–0.021%



Appendix C

City & County Human Trafficking Action Chart

Recommendation	Action Required	Enforcement Mechanism	Timeline	Enforcement Priorities / Agencies
#1: Enforce Posting Requirements (City of LA)	Ensure 13 categories of businesses (airports, bus stations, hotels, massage parlors, hospitals, etc.) post mandated notices on trafficking	Civil penalties: \$1,000 first offense; \$2,000 subsequent offenses	Immediate reminders; enforcement within 3 months	LA City Bureau of Contract Administration, Office of Wage Standards
#1: Enforce Posting Requirements (LA County)	Ensure 13 additional categories (nursing facilities, salons, gas stations, garment factories, shelters, construction sites, etc.) comply with posting mandates	Administrative fines up to \$1,000/day; civil penalties up to \$2,500/day; misdemeanor prosecution	Immediate reminders; enforcement within 3 months	LA County DCBA, Office of Labor Equity
#1: Enforce State Ticketing Requirement (Cal. Civ. Code § 52.66)	Require ticket vendors for Olympics & World Cup to include trafficking info on electronic tickets; review draft language before distribution	Mandatory compliance under state law; re-send updated tickets if already issued without required language	Immediate notices to vendors	City & County Counsel; Ticketing vendors
#1: Enforce Training Requirements (LA County Code § 13.110.070)	Ensure 25 categories of businesses show DHS 20-minute trafficking awareness video to employees	Administrative fines up to \$1,000/day; civil penalties up to \$2,500/day; misdemeanor prosecution	Notices issued immediately; enforcement within 3 months	LA County DCBA, Office of Labor Equity
#1: Enforce State Training Requirements (SB 970 & AB 2034)	Require hotel/motel employees and transit operators to complete trafficking awareness training	State law mandates compliance; penalties for non-compliance	Ongoing; intensified enforcement 3 months after reminders	State Labor Commissioner; Transit Authorities
#2: Enforce Existing Procurement Standards	Fully leverage 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	Begin immediately; ongoing monitoring	City Bureau of Contract Administration; County ISD



#2B: Adopt IDS Proposed Updates	Quickly adopt LA County Internal Services Department's drafted ordinances prohibiting trafficking; City should mirror protections	Ordinance pending with County Counsel (2025 report back)	Adoption prior to Olympics & World Cup	County Counsel; City Council
#2C: Enforce Sweat-Free Ordinances	Ensure contractors pay prevailing wages and comply with labor rights obligations under City ordinances	Enforcement by Labor Compliance Program (payroll review, site visits, worker complaint investigations)	Ongoing; intensified enforcement during event preparation	City Bureau of Contract Administration, Office of Wage Standards
#3A: Coordinate Public Health– Focused Response	Mayor's Office convenes monthly inter-agency meetings six months prior to events; prioritize survivor-centered services and harm reduction	Coordination mandate; enforcement through agency participation requirements	Begin 6 months prior to events; monthly meetings	Required agencies: Mayor's Office, LA City Emergency Management, Office of Wage Standards, Public Works, Bureau of Contract Administration, Community Investment for Families, LA County Public Health, DCBA/Office of Labor Equity, Office of Immigration Affairs, County Office of Emergency Management
#3B: Safeguard Immigrant & Worker Rights	Incorporate protections into Human Rights Action Plans and negotiate MOUs with federal agencies	MOUs must include: (1) Protection from Enforcement (no ICE/CBP raids near venues); (2) Non-Discrimination (ban racial profiling, arbitrary detention, restrictions on peaceful protest); (3) Community Involvement (collaboration with unions, immigrant rights groups, NGOs)	Negotiation and adoption prior to Olympics & World Cup	Mayor's Office; County Office of Immigration Affairs; Unions; Immigrant Rights Groups; Federal Agencies (ICE, CBP)



- ⁱ *Profits and poverty: The economics of forced labour*; International Labour Organization, (2d ed., Geneva: International Labour Office, 2024). <https://www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour>
- ⁱⁱ ILO, *Profits and poverty*, *supra*.
- ⁱⁱⁱ James McBride et al., *The Economics of Hosting the Olympic Games*, Council on Foreign Relations (July 20, 2024), www.cfr.org/backgrounder/economics-hosting-olympic-games; Matt Slater, *FIFA revenues projected to surpass \$10bn with 2026 World Cup*, New York Times (June 11, 2025), <https://www.nytimes.com/athletic/6417221/2025/06/11/fifa-2026-world-cup-revenue/>.
- ^{iv} *What's the Cost of a Rumour? A Guide to Sorting Out the Myths and the Facts About Sporting Events and Trafficking*, Global Alliance Against Traffic in Women, (2011) ("GAATW Report"), <https://www.gaattw.org/publications/WhatstheCostofaRumour.11.15.2011.pdf>.
- ^v Michelle Lillie, *Human Trafficking Surrounding the Olympics*, Human Trafficking Search (Aug. 5, 2016), <https://humantraffickingsearch.org/201685human-trafficking-surrounding-the-olympics/>; *Human Trafficking and Forced Labor in the Context of the Olympics and Major Sporting Events*, Ohio State Univ., Global Human Trafficking Blog, (Mar. 5, 2018), <https://u.osu.edu/osuhtblog/2018/03/05/human-trafficking-and-forced-labor-in-the-context-of-the-olympics-and-major-sporting-events/>; Megan Scopp, *The Role of Major Sporting Events in Human Rights Violations: FIFA, the Olympics, and Beyond*, Human Rights Rsch. Ctr. (Apr. 10, 2025), <https://www.humanrightsresearch.org/post/the-role-of-major-sporting-events-in-human-rights-violations-fifa-the-olympics-and-beyond> (last visited Dec. 4, 2025).
- ^{vi} Guidelines for safeguarding human rights at the venues: Tokyo 2020 :Legacy edition for future organisers / The Tokyo Organising Committee of the Olympic and Paralympic Games, <https://library.olympics.com/Default/doc/SYRACUSE/1854633/guidelines-for-safeguarding-human-rights-at-the-venues-tokyo-2020-legacy-edition-for-future-organise?lg=en-GB>.
- ^{vii} LA28 Responsible Sourcing Code, <https://la28.app.box.com/s/zt3tdunqmo7jlp1uenikrgsms7ywal8v>.
- ^{viii} FIFA, *FIFA's Human Rights Policy 1* (May 2017), https://media.business-humanrights.org/media/documents/files/documents/FIFAs_Human_Rights_Policy_0.pdf.
- ^{ix} FIFA, *Sustainability Strategy for the 2018 FIFA World Cup Russia 1* (July 2015), <https://www.icsspe.org/system/files/FIFA%20%20Sustainability%20Strategy%20for%202018%20FIFA%20World%20Cup.pdf>
- ^x FIFA, *World Cup 2026 Sustainability and Human Rights Strategy: Social Pillar*, <https://inside.fifa.com/tournament-organisation/world-cup-2026-sustainability-strategy/social-pillar>.
- ^{xi} FWC26 Human Rights Framework (2024), https://www.sporhumanrights.org/media/oq5n0wgz/fwc26-human-rights-framework_final_en_24-july-2024_updates_clean.pdf.
- ^{xii} Brenton J. Oliver & Amanda De Lisio, *Rights, not rescue trafficking (in)securities at the sport mega-event*, FRONTIERS 5 (Sept. 10, 2023), <https://www.frontiersin.org/journals/sports-and-active-living/articles/10.3389/fspor.2023.1207595/full>; Kayla Lynn Anderson, *Cases of Forced Labor and Policy Responses Regarding Human Trafficking Legislation at Mega Sporting Events* (Master's Thesis), Univ. Kansas (May 27-Aug. 31, 2015), <https://kuscholarworks.ku.edu/server/api/core/bitstreams/39764298-f367-4497-9c35-b1cd508d6937/content>; Amanda De Lisio, Philip Hubbard, Michael Silk, *Economies of (Alleged) Deviance: Sex Work and the Sport MegaEvent*. Sexuality Rsch. & Soc. Pol'y, 1-11, Advance online publication (Feb. 2018), https://eprints.bournemouth.ac.uk/30316/21/Lisio2019_Article_EconomiesOfAllegedDevianceSexW.pdf; *Human Rights Risk Mitigation in the Sports Context* (White Paper) Centre for Sport & Human Rights (Jan. 31, 2017), <https://www.sporhumanrights.org/library/human-rights-risk-mitigation-in-the-sports-context>; GAATW Report *supra*.
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- ^{xiv} *Sex Work and the Sport MegaEvent supra*; Deering *supra*.
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- ^{xvi} *Human Rights Risk Mitigation in the Sports Context supra*; Anderson *supra*; Gregory Mitchell, *Evangelical Ecstasy Meets Feminist Fury: Sex Trafficking, Moral Panics, And Homonationalism During Global Sporting Events*, GLQ (Duke Univ. Press June 1, 2016), <https://read.dukeupress.edu/glq/article-abstract/22/3/325/34968/Evangelical-Ecstasy-Meets-Feminist-FurySex?redirectedFrom=fulltext>; Oliver & De Lisio *supra*; Daniela Heerdt, *Blurred lines of responsibility and accountability: Human rights abuses at mega-sporting events*, Doctoral Thesis Tilburg Univ. (2021), <https://research.tilburguniversity.edu/en/publications/blurred-lines-of-responsibility-and-accountability-human-rights-a/>; Philip Hubbard, *The 2016 Rio Olympics made sex work more dangerous*, Kings Coll. London (Apr. 4, 2019), <https://www.kcl.ac.uk/news/the-2016-rio-olympics-made-sex-work-more-dangerous>.
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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.”

...

“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 **fund 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 increase 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 **establishment 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 (SJ) is an evidence-based and survivor-informed think tank based out of Loyola Law School. SJ 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 SJ**

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