

## Communication from Public

**Name:** Greater LA Small Business Coalition  
**Date Submitted:** 10/13/2025 06:52 PM  
**Council File No:** 23-0932  
**Comments for Public Posting:** See attached.



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

**Subject: OPPOSE - CLA Report Recommendations on Enforcement of Workplace Violations – CF: 23-0932**

Dear Council President and Members of the Los Angeles City Council:

On behalf of the greater Los Angeles business community—including organizations representing employers across retail, restaurants, health care, hospitality, construction, real estate and other key industries—we strongly oppose the recommendations outlined in the Chief Legislative Analyst’s report on Enforcement of Workplace Violations.

These recommendations would impose damaging consequences on every employer in Los Angeles—from major industries to the city’s thousands of small and minority-owned businesses that are already fighting to survive. Worse, the report was developed without any consultation with the business community. This irresponsible exclusion has produced recommendations that are unfair, discriminatory and disconnected from the realities employers and workers face.

To be clear, employers are firmly committed to protecting workers’ rights and complying with employment laws. Safe, fair workplaces are the foundation of strong businesses, thriving communities and opportunity for employees. These proposals, however, would do nothing to strengthen compliance or improve worker protections. Instead, they would outsource City enforcement to third-party advocacy groups—granting them sweeping powers to target industries based on accusations, not facts—while stripping away due process, jeopardizing employee privacy and eliminating impartiality. Specifically, the proposals would:

- **Undermine Employee Privacy:** The proposed “co-enforcement” model would deputize outside advocacy groups, potentially exposing sensitive employee data—including immigration status—at a time when fears around enforcement are already heightened. **Employees have a fundamental right to protect their personal information from unwanted and unwarranted government and third-party intrusion.** The CLA’s own report concedes that the government “cannot share records with external entities” yet provides no plan to mitigate these risks or explain how non-governmental organizations could enforce city or state laws without violating information-sharing restrictions, undermining employee and employer privacy.

- **Erode Due Process:** The report wrongly equates investigations with violations, labeling industries as “high risk” based on unproven allegations. It recommends costly enforcement sweeps and harsher penalties—targeting employers based on accusations alone—undermining due process. **Handing enforcement power to advocacy groups with vested interests further undermines impartiality, turning enforcement into an agenda-driven process instead of a fact-based one.**

Further, the report’s push for “regulation by shaming” through a public database of resolved violations is misguided. Many workplace cases involve fact-specific, good faith disputes—such as conflicting records over reimbursements or meal breaks—not malicious wage theft. Yet the proposal would lump these employers onto the same public list as bad actors, unfairly stigmatizing businesses and pressuring them into premature settlements to avoid reputational harm. It also hands trial attorneys a “shopping list” for lawsuits, inviting frivolous claims and higher penalties. Rather than improving compliance, this approach undermines due process and disproportionately harms small and minority-owned businesses.

- **Waste Scarce City Resources on Duplicative Programs:** California already has the strongest worker protections in the nation, enforced by multiple state and county agencies. The CLA’s recommendations duplicate this work at enormous cost—**\$3 million over nine months and \$30 million over ten years**—while offering no added benefit to workers. With City deficits mounting and essential services on the chopping block, pouring scarce resources into redundant programs is fiscally reckless.

These sweeping changes would raise costs, threaten jobs, and make Los Angeles even less affordable for families and businesses. Employers deserve a seat at the table before policies of this magnitude are considered.

We urge the Council to **reject these recommendations outright** and instead engage in meaningful dialogue with the business community to develop fair, effective, and fiscally responsible solutions.

Sincerely,

Stuart Waldman, President  
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Sean Piazza, Chair  
**California Alliance of Family Owned Businesses**

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Glenn Spencer, Senior Vice President  
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Bob Smith, Executive Director  
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