



PREVENTING HUMAN TRAFFICKING BEFORE AND DURING MAJOR SPORTING EVENTS

STEPHANIE RICHARD, DIRECTOR, SUNITA
JAIN ANTI-TRAFFICKING INITIATIVE,
LOYOLA LAW SCHOOL



SUNITA JAIN ANTI-TRAFFICKING INITIATIVE

We are an evidence-based, community-informed think tank that intentionally fills gaps in the prevention of human trafficking through an intersectional framework that fosters systemic change and progressive policy innovations.

We implement and support anti-trafficking strategies through an environmental, immigrant, economic and racial justice lens.



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



WHY HUMAN TRAFFICKING & MAJOR SPORTING EVENTS?



- Forced Labor Shown to Increase
 - No Evidence-Based Data Sex Trafficking Increases
- Unintended consequences of educating and focusing on Sex Trafficking creates harm for vulnerable communities



DOCUMENTED ABUSE

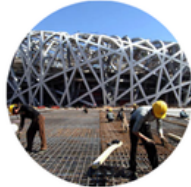


2004 ATHENS OLYMPICS

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

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



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



WHAT TRAFFICKING MAY LOOK LIKE IN LA

- Construction/Improvements for venues
 - Landscapers
 - Subcontracts for temporary workers (Take down /set up)
 - Hospitality Workers
 - Janitorial Services
 - Street Vendors
 - Forced Peddling
 - Supply chains for merchandise
- Increased purchase of commercial sex
 -



Know how to provide help

Available in English
& Spanish

<https://canva.link/j34r8xuvea96pc0>



KNOW THE SIGNS

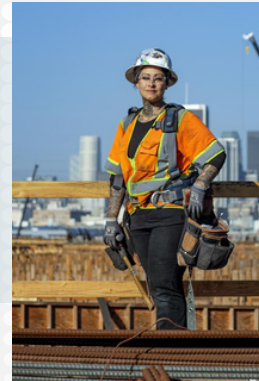
Large events can increase demand for temporary labor. Traffickers may use false promises to exploit workers.



- Promises of work or housing that seems too good to be true.
- Working in unsafe conditions or not being paid.
- Forced to work & live in the same place.

STAY SAFE

Protect yourself by asking questions and staying in touch with people you trust. Help should never come with pressure.



- Ask questions about pay, hours, and housing before you accept work.
- Keep your ID & personal documents with you.
- Meet in public & share your location with a trusted friend.

FINDING SUPPORT

If something feels wrong, you can ask for help. Supportive services are available regardless of job or immigration status.



- Reach out trusted organizations or worker centers.
- Save important numbers in your phone.
- You have the right to leave unsafe situations. You are not alone.

Human Trafficking happens when someone is controlled through force, threats or lies to make them work or perform sex acts. If you or someone you know may be in danger, call:

National Human Trafficking Hotline 888-373-7888



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



PUBLIC HEALTH APPROACH TO COMBATING TRAFFICKING BEFORE & DURING SPORTING EVENTS

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



HUMAN RIGHTS PLANS MUST BE FUNDED

Recommend	Purpose	FIFA	LA28
#1 Fund Public Awareness Campaigns	Launch awareness campaign six months prior to events;	\$300,000	\$300,000
#2: Fund and Publish Independent Audits of Event-Related Contracts	Worker-led audits of stadiums, hotels, transit hubs, and service contractors	\$400,000	\$400,000
#3: Safeguard Immigrant & Worker Rights	Legal monitoring, community engagement, MOUs with ICE/CBP	\$150,000	\$150,000
#4: Fund Increased Access to Local Hotline	Expand hotline capacity, staffing, multilingual services, outreach	\$250,000	\$250,000
#4: Victim Fund for Service Providers	Support survivor services	\$1,000,000	\$1,000,000
#5: Funding Pools for Innovative Anti-Trafficking	Creative outreach, prevention campaigns, crisis intervention	\$1,000,000	\$1,000,000
#6: Fund Independent Evaluations	Independent research	\$500,000	\$500,000



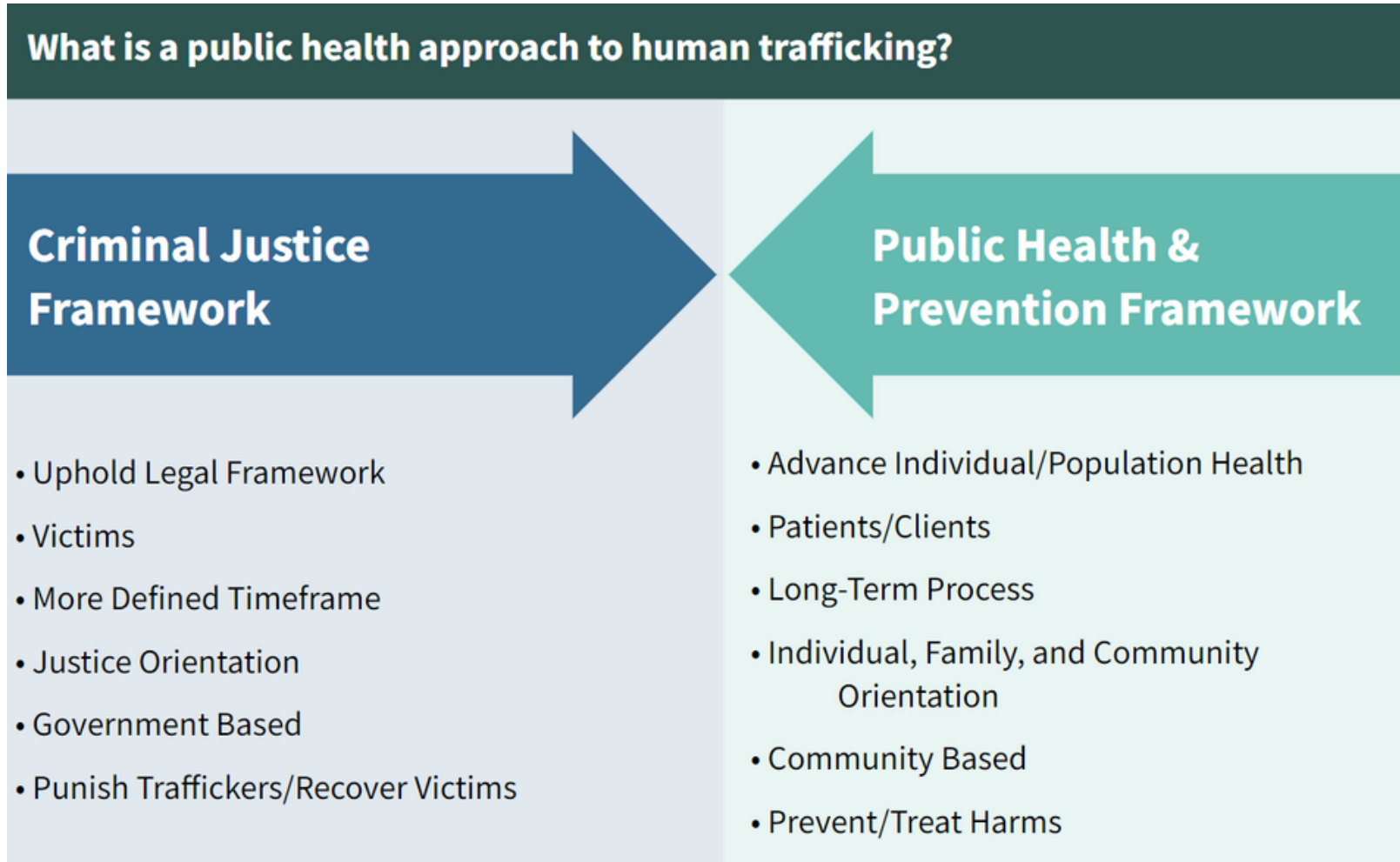
Appendix C
City & County Human Trafficking Action Chart

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

LA AGENCIES

#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)

PREVENTING HARM: A PUBLIC HEALTH APPROACH



EXAMPLES: PUBLIC HEALTH APPROACH



PREVALENCE STUDY

- LA would invest in knowing what trafficking looked like in our city & county
- LA would design outreach and service programs based on data



SURVIVOR VOICE & CHOICE

- Services would:
- ensure survivors consulted
- voluntary
- prioritize choice and empowerment
- Support accountability and change
- Focus on prevention based on survivor ideas



COMMUNITY-BASED OUTREACH MODEL

- Delivered through local, culturally responsive programs/ Peer advocates
- Individually designed for different communities/aspects of trafficking.
- Escape/leaving is on victims own terms.



WHY IT MATTERS

- Aims to prevent traumatization and system-based harm.
- Costs is far less than incarceration and reduces long-term system burden.
- Helps break cycle through early intervention.



PREVENTING HARM

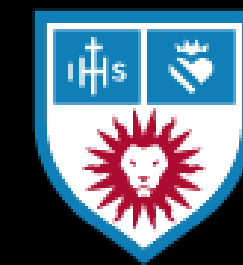
— QUESTIONS:

- Does investing in law enforcement operations and trafficking contribute to prevention and long-term safety for survivors? If so, how?
- How much does a law enforcement operation for human trafficking actually cost, and what are the results?



BASELINE: HUMAN TRAFFICKING

- Human trafficking at its core is about exploitation for commercial purposes.
- Individuals do not choose if they are sex or labor trafficked or both.
- The dynamics of why and how individuals are recruited into sex or labor trafficking is therefore strikingly similar as are the trauma bonds to the traffickers



Loyola Law School
Loyola Marymount University
Los Angeles

FEDERAL RESPONSE TO TRAFFICKING - TVPA

(Victims of Trafficking and Violence Prevention Act of 2000 can be found at <https://www.state.gov/j/tip/laws/61124.htm>)

TVPA

Created/Defined crimes of trafficking and forced labor

Protection to trafficked persons through immigration relief and other benefits

Created specialized funding for US service providers for first time

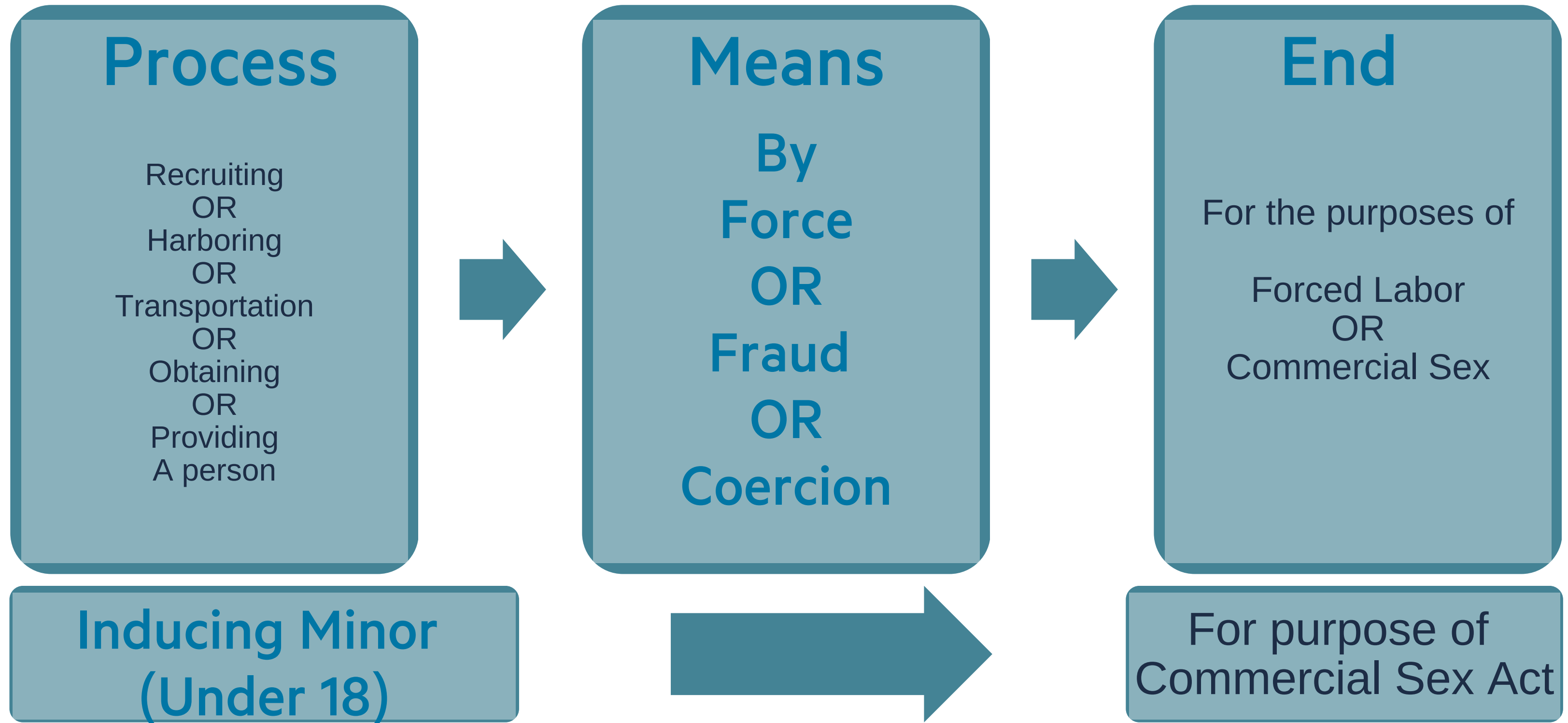
Reauthorized in 2003, 2005, 2008, 2013, 2017, 2018. 2022

HUMAN TRAFFICKING DEFINED – 22 USC § 7102(11)

The term “severe form of trafficking in persons” means:

- (A) sex trafficking 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; or
- (B) 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.

3 ELEMENTS OF TRAFFICKING - 22 USC § 7102(11)



CALIFORNIA STATE LAW AB 22 — CA TRAFFICKING VICTIM PROTECTION ACT (2005)

- **PENAL CODE § 236.1**
- **PROHIBITS HUMAN TRAFFICKING FOR**
 - certain sex offenses
 - forced labor or services

Coercion legally defined in CA Penal Code 236.1(h)(1) / 22 U.S.C. § 7102

**THREAT OF SERIOUS
HARM TO OR PHYSICAL
RESTRAINT AGAINST A
PERSON**

Any scheme, plan, or
pattern intended to
cause a person to
believe that failure to
act would result in
serious harm or
physical restraint

**ABUSE OR
THREATENED
ABUSE OF
LEGAL PROCESS**

Catch-All

ABUSE OF LEGAL PROCESS (TVPPRA 2008)

22 USC § 7102(1), 18 USC § 1589(c)(1) Forced Labor, 18 USC § 1591(e)(1) Sex Trafficking

**USE OR THREATENED
USE OF A LAW OR
LEGAL PROCESS**

- Administrative
- Civil
- Criminal



**IN ANY MANNER OR
FOR ANY PURPOSE
FOR WHICH THE LAW
WAS NOT DESIGNED**



**TO EXERT PRESSURE
ON ANOTHER PERSON
TO CAUSE/REFRAIN
THEM TO TAKE ACTION**



SERIOUS HARM (TVPA 2008)

18 USC § 1589(c)(2) Forced Labor, 18 USC § 1591(e)(4) Sex Trafficking

- **ANY HARM WHETHER:**
 - **PHYSICAL**
 - **PSYCHOLOGICAL**
 - **FINANCIAL**
 - **REPUTATIONAL HARM**
- **THAT IS SUFFICIENTLY SERIOUS UNDER ALL SURROUNDING CIRCUMSTANCES TO COMPEL A REASONABLE PERSON OF THE SAME BACKGROUND AND SAME CIRCUMSTANCES TO PERFORM LABOR OR COMMERCIAL SEX ACT TO AVOID HARM.**

**MISCONCEPTION #1:
TRAFFICKING REQUIRES
TRANSPORTATION ACROSS
BORDERS**

**Fact: No movement is
required**

PROCESS/ACTION

Recruiting; or

Harboring; or

Transportation; or

Obtaining; or

Providing

Misconception #2: You can consent to human trafficking

Fact: You can't consent to an illegal act.

No "Means" necessary for minors (under 18) induced into commercial sex act

MEANS

FORCE; OR

FRAUD; OR

COERCION

MISCONCEPTION #3: INDIVIDUALS CANNOT BE PAID FOR WORK

**FACT: LACK OF PAYMENT IS NOT
AN ELEMENT OF TRAFFICKING
CRIME. SOME TRAFFICKING
VICTIMS DO RECEIVE MONEY**

END/PURPOSE

Involuntary Servitude; or

Debt Bondage; or

Slavery; or

Sex Trafficking

LABOR EXPLOITATION

ACTIONS IN THE WORK PLACE THAT VIOLATE LABOR LAW.

Extreme exploitation absence of living wage or long work hours

Poor working conditions such as health and safety hazards

Arbitrary discipline, such as verbal or physical abuse

Fear and intimidation when they speak out, organize or attempt to form a union

LABOR EXPLOITATION

- “I DON’T FEEL LIKE I COULD FIND ANOTHER JOB.”
- CHILD LABOR
- MINORS UNDER THE LEGAL WORKING AGE

HUMAN TRAFFICKING

- “MY EMPLOYER SAID THAT IF I DIDN’T DO WHAT I WAS TOLD SHE WOULD CALL POLICE/DEPORT/BLACK LIST /HURT ME OR PEOPLE I CARE ABOUT.”



LABOR TRAFFICKING EXAMPLES

- Tara (19, USA) freed herself by running away after she was forced to work for no pay selling magazine subscriptions. When she was asked to leave, her traffickers smashed her cell phone and threatened her. She ran away to a local police station.
- Arnold (32, Philippines) was promised a good job in the US by a recruitment agency and secured a lawful visa to come to the US. He went into about \$5000 of debt to pay the placement fee. He and the other workers were told they would be arrested by the police and deported if they left. When one worker ran away, the employer posted a Wanted Sign in the house that said the runaway was wanted by the police.
- Maya (15, USA) was kidnapped by two men who kept her in a locked box. They sexually assaulted her and physically harmed her. When she was not forced inside the locked box, the men forced her to cultivate marijuana without pay.

SEX TRAFFICKING EXAMPLES

- Angela (15, United States) started running away at the age of 13 because of sexual abuse at home. She had contact with the Child Dependency system at least 11 separate times. At the age of 13, she was introduced by a friend to a man who forced her to engage in prostitution through beatings and other abuse. Angela was arrested two separate times. She has currently disappeared from the system.
- Jasmine (21, Korea) was promised a good job as a masseuse when she came to the US. When she arrived, she was told she already owed \$20,000 to the trafficker and that she had to pay this off working as a prostitute. She was forced to see up to 20 customers a day and knew her traffickers had connections to criminal gangs.
- Johnny (14, USA) knew he was gay at an early age. After suffering constant bullying at school and the pressure to conform at home, he ran away. He was raped on the street, and pretty soon he was selling his body to make money.

KEY QUESTIONS TO KEEP IN MIND

- Was the person recruited? What were they promised?
- Were passports or other identity documents taken?
- Was the person paid? How much? How many hours a day did the person work?
- What were the working conditions in the U.S.?
- Was the person coerced?
 - Force, Physical Threats, Legal threats, Plan to control
- Did the person try to leave? Could they stop working if they wanted to?
- Did someone have to do something illegal and someone else got money for it?
- Is the person afraid of his/her employer? Why?



WHAT INDUSTRIES ARE PEOPLE TRAFFICKED INTO?

Commercial Sex	Domestic Service/ Au Pairs	Restaurant Work	Hair Braiding Salons	Garment Industry	Magazine crews
Illegal Acts/Illegal Services	Nail/Massage Salons	Manufacturing work	Home care/ Elder care	Construction	Hospitality
Housekeeping	Janitorial	Forced peddling	Agricultural work	Cleaning business	Marriage

HUMAN TRAFFICKING FOR FORCED CRIMINALITY



- Commercial Sex
- Recruiting/Trafficking Others
- Smuggle, Sell, Cultivate, Use drugs
- Theft – Property, Auto
- Gang Activities
- Scams; Stolen Checks
- Identify Theft
- Benefits fraud
- Loitering for sales
- Truancy

**... CAN BE A FORM OF FORCED LABOR OR
SERVICES!**

PEER RECRUITMENT, TEACHING, FACILITATING TRAFFICKING

Assess for Each

IS THIS LABOR
TRAFFICKING FOR
FORCED CRIMINALITY?
WAS FORCE, FRAUD OR
COERCION USED BY
THIRD PARTY?



IS IT MUTAL AID?
IS SOMEONE HELPING
ANOTHER WITH NEEDS.

NOT COMMERICALLY
BENEFITING/NO THIRD
PARTY



Is a person using
force, fraud
or coercion
and trafficking
another

Is a person inducing
a child into
commercial sex and
commercially
benefiting?

THANK YOU

PLEASE TAKE THE SURVEY

[HTTPS://MYLMU.CO1.QUALTRICS.COM/JFE/FORM/SV_01BNFJCF3JGEH70](https://mylmuc01.qualtrics.com/jfe/form/sv_01BNFJCF3JGEH70)

FOR MORE INFORMATION, CONTACT:
STEPHANIE.RICHARD@LLS.EDU



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

