



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*



This report was prepared by the [Sunita Jain Anti-Trafficking Initiative \(SJI\)](#) at Loyola Law School in collaboration with [Arnold & Porter](#).

For inquiries regarding this report, please contact:

**Sunita Jain Anti-Trafficking Initiative
Loyola Law School**

919 Albany St, Los Angeles, CA 90015

Email: anti-trafficking@lls.edu Website: www.lls.edu/sunitajain

© 2025 Sunita Jain Anti-Trafficking Initiative and Arnold & Porter. All rights reserved.



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 (JRACTI) 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. For example, local campaigns, such as No Traffick Ahead, which focused on the Bay Area, have 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 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

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.



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.

- 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:



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

- 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.
- 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.



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 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 a local service provider 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:

Los Angeles 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, the local hotline 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 service providers and community-based legal services organizations—that can deliver survivor-centered services. Allowing these 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:

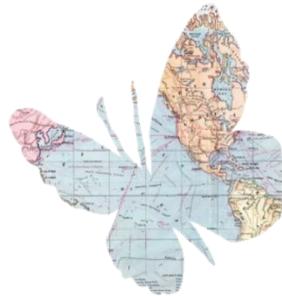
Independent evaluations should be funded at \$500,000 per event cycle (a total of \$1 million), with FIFA and LA28 each contributing half of that sum. This modest investment will ensure accountability, transparency, and credibility, while reinforcing the legacy of human rights protections tied to global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

FOLLOW US

Stay connected by following us on social media, where we share updates on our advocacy, highlight survivor-centered initiatives, and post opportunities to get involved.

- [Instagram](#)
- [Facebook](#)
- [LinkedIn](#)
- [YouTube](#)
- [X](#)
- [BlueSky](#)

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	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



<p>#2B: Adopt IDS Proposed Updates</p>	<p>Quickly adopt LA County Internal Services Department's drafted ordinances prohibiting trafficking; City should mirror protections</p>	<p>Ordinance pending with County Counsel (2025 report back)</p>	<p>Adoption prior to Olympics & World Cup</p>	<p>County Counsel; City Council</p>
<p>#2C: Enforce Sweat-Free Ordinances</p>	<p>Ensure contractors pay prevailing wages and comply with labor rights obligations under City ordinances</p>	<p>Enforcement by Labor Compliance Program (payroll review, site visits, worker complaint investigations)</p>	<p>Ongoing; intensified enforcement during event preparation</p>	<p>City Bureau of Contract Administration, Office of Wage Standards</p>
<p>#3A: Coordinate Public Health-Focused Response</p>	<p>Mayor's Office convenes monthly inter-agency meetings six months prior to events; prioritize survivor-centered services and harm reduction</p>	<p>Coordination mandate; enforcement through agency participation requirements</p>	<p>Begin 6 months prior to events; monthly meetings</p>	<p>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</p>
<p>#3B: Safeguard Immigrant & Worker Rights</p>	<p>Incorporate protections into Human Rights Action Plans and negotiate MOUs with federal agencies</p>	<p>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)</p>	<p>Negotiation and adoption prior to Olympics & World Cup</p>	<p>Mayor's Office; County Office of Immigration Affairs; Unions; Immigrant Rights Groups; Federal Agencies (ICE, CBP)</p>



-
- 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/oq5n0wgez/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*.
- ^{xiii} Oliver & De Lisio *supra*; *Sex Work and the Sport MegaEvent supra*; Sonja Dolinsek, *World Cup 2014: On myths and reality of sex trafficking*, Al Jazeera (June 7, 2014), <https://www.aljazeera.com/opinions/2014/6/7/world-cup-2014-on-myths-and-reality-of-sex-trafficking>; Kathleen Deering, Kate Shannon, *Fears of an influx of sex workers to major sporting events are unfounded*, BMJ 345 (Sept. 3, 2012), <https://www.bmj.com/content/345/bmj.e5845>.
- ^{xiv} *Sex Work and the Sport MegaEvent supra*; Deering *supra*.
- ^{xv} *Sex Work and the Sport MegaEvent supra*; Dolinsek *supra*; Deering *supra*; *Human Rights Risk Mitigation in the Sports Context supra*.
- ^{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>.

^{xvii} Allison Grossman, *The Super Bowl is NOT a large Human Trafficking event*, Woodhull Freedom Found. (Feb. 6, 2025), <https://www.woodhullfoundation.org/fact-checked/super-bowl-and-sex-trafficking/>; Arielle Robinson, *Sex workers often harmed by Super Bowl sex trafficking narrative, advocates say*, La. Illuminator (Feb. 16, 2025), <https://lailluminator.com/2025/02/16/sex-trafficking/>; Mathew Cimtile, *Does the Super Bowl increase Human Trafficking in host city?*, Univ. of S. Fla. News (Feb. 4, 2025), <https://www.stpetersburg.usf.edu/news/2025/does-the-super-bowl-increase-human-trafficking-in-host-city.aspx>; Paula Cornell, *The Truth About Human Trafficking During the Super Bowl*, Love Justice Int'l (Feb. 4, 2025), <https://www.lovejustice.ngo/blog/the-truth-about-human-trafficking-during-the-super-bowl/>; Naoka Foreman, *Sex workers push back on Super Bowl trafficking narrative*, The Nev. Indep. (Feb. 9, 2024), <https://thenevadaindependent.com/article/sex-workers-push-back-on-super-bowl-trafficking-narrative>; Noah Berlatsky, *Sex workers and advocates organize to stop trafficking raids around Super Bowl*, Prism (Feb. 7, 2024), <https://prismreports.org/2024/02/07/sex-workers-las-vegas-super-bowl/>; *Is the Super Bowl the Largest Human Trafficking Event in the World?*, IJM (Jan. 31, 2020, updated Jan. 2024), <https://www.ijm.org/news/is-the-super-bowl-the-largest-human-trafficking-event-in-the-world/>; Abigail Higgins, *Increased sex trafficking during the Super Bowl is a dangerous Myth, these L.A. sex workers say*, Wash. Post (Feb. 8, 2022), <https://www.washingtonpost.com/lifestyle/2022/02/08/sex-workers-trafficking-super-bowl/>; *Human Trafficking and the Super Bowl*, Freedom Network USA (Feb. 5, 2021), <https://freedomnetworkusa.org/2021/02/05/human-trafficking-and-the-super-bowl/>; Lauren Martin & Annie Hill, *Debunking the Myth of 'Super Bowl Sex Trafficking': Media hype or evidenced-based coverage*, Anti-Trafficking Review, No. 13, 13-29 (Sept. 2019), <https://www.antitraffickingreview.org/index.php/atjournal/article/view/404/336>; *Worried about Human Trafficking and the Super Bowl? Consider your Nachos*, Polaris Project (Jan. 30, 2019), <https://polarisproject.org/blog/2019/01/worried-about-human-trafficking-and-the-super-bowl-consider-your-nachos/>; *Minneapolis Sex Workers Legal Training Mitigates Super Bowl Crackdown Fears*, Unicorn Riot (Feb. 3, 2018), <https://unicornriot.ninja/2018/minneapolis-sex-workers-legal-training-mitigates-super-bowl-crackdown-fears/>; Kyle Miller et al., *Do Public Events Affect Sex Trafficking Activity?*, Carnegie Mellon Univ. (Feb. 16, 2016), <https://arxiv.org/pdf/1602.05048>.

^{xviii} See GAATW Report *supra*; Higgins *supra*; Hubbard *supra*; Berlatsky *supra*; Robinson *supra*; Foreman *supra*; Oliver & De Lisio *supra*; Mitchell *supra*; Dolinsek *supra*; Ronald Weitzer, *New Directions in Research on Human Trafficking*, The Annals of the Am. Acad. of Pol. & Soc. Sci. (Mar. 28, 2014), <https://www.jstor.org/stable/i24540178>; Cynthia Soohoo, *Criminalization of Trafficking Victims*, CUNY (Apr.-May 2015), https://upr-info.org/sites/default/files/documents/2015-04/js50_upr22_usa_e_coverpage.pdf; Elizabeth Nolan Brown, *It's Time to Retire Super Bowl 'Sex Trafficking' Stings and Myths*, Reason (Feb. 5, 2024), <https://reason.com/2024/02/05/its-time-to-retire-super-bowl-sex-trafficking-stings-and-myths/>.

^{xix} Jamie Doward, *London 2012 Olympics: Crackdown on brothels 'puts sex workers at risk'*, The Observer (Apr. 9, 2011); <https://www.theguardian.com/uk/2011/apr/10/brothel-crackdown-london-olympics-risk>; GAATW Report *supra*.

^{xx} Human Rights Risk Mitigation in the Sports Context *supra*; Anderson *supra*; Mitchell *supra*; Oliver & De Lisio *supra*; Heerdt, *supra*; Hubbard *supra*.

^{xxi} *Report on Reimagining Los Angeles County's Approach to Human Trafficking*, L.A. Cnty. Off. of Consumer Bus. & Affs. (Mar. 19, 2024) at 9, https://dcba.lacounty.gov/wp-content/uploads/2024/07/2024-03-20ReportBackonReimaginingtheCounty_sApproachtoHumanTrafficking_rc.pdf.

^{xxii} Letter from Matthew W. Szabo to L.A. City Counsel re: Protocols Against Forced Labor in City Procurement (Sept. 25, 2024), https://cityclerk.lacity.org/onlinedocs/2023/23-1364_misc_9-25-24.pdf.

^{xxiii} Letter from Michael Own to L.A. Cnty. Bd. of Supervisors re: Report Back of Preventing Human Trafficking in the Wake of Natural Disaster Motion (June 2, 2025), [1185461_ISD-ReportBackonPreventingHumanTraffickingintheWakeofNaturalDisasters-June2025.pdf](https://www.lacounty.gov/wp-content/uploads/2025/06/1185461_ISD-ReportBackonPreventingHumanTraffickingintheWakeofNaturalDisasters-June2025.pdf).

^{xxiv} See Letter from Matthew W. Szabo to L.A. City Counsel re: Protocols Against Forced Labor in City Procurement (Sept. 25, 2024), https://cityclerk.lacity.org/onlinedocs/2023/23-1364_misc_9-25-24.pdf.



-
- ^{xxv} L.A. Cnty. RFP Contract (sample), https://file.lacounty.gov/SDSInter/isd/dbw/1080698_Sample_RFP_Contract_and_Exhibits.pdf.
- ^{xxvi} Revised Motion by L.A. Cnty. Supervisor Holly J. Mitchell, Preventing Human Trafficking in the Wake of Natural Disaster (Apr. 1, 2025), <file.lacounty.gov/SDSInter/bos/supdocs/201703.pdf>.
- ^{xxvii} Letter from Rafael Carbajal to L.A. Cnty. Supervisors re: Report on Preventing Human Trafficking in the Wake of Natural Disasters (June 6, 2025), file.lacounty.gov/SDSInter/bos/bc/1185810_2025-06-06ReportonPreventingHumanTraffickingintheWakeofNaturalDisasters_rc.pdf; Letter from Michael Own to L.A. Cnty. Bd. of Supervisors re: Report Back of Preventing Human Trafficking in the Wake of Natural Disaster Motion (June 2, 2025), file.lacounty.gov/SDSInter/bos/bc/1185461_ISD-ReportBackonPreventingHumanTraffickingintheWakeofNaturalDisasters-June2025.pdf.
- ^{xxviii} *Community Advocates Respond to LA County's Report on Preventing Human Trafficking After Disasters*, Loyola L. Sch. (June 16, 2025), www.lls.edu/academics/experientiallearning/sunita-jain/news/pressreleases/la-county-trafficking-report/.
- ^{xxix} See Sunita Jain Anti-Trafficking Policy Initiative, *Eight Years of Federal Procurement Policies Demonstrate the Impact to Prevent Trafficking Globally* (Nov. 2024), FACTSHEET_How Federal Procurement Policies have Prevented Human Trafficking (2017-2024).pdf.
- ^{xxx} Unite Here Local 11, Fair Games: A New Deal for Our Future, <https://www.unitehere11.org/fair28/>.
- ^{xxxi} Verité, *Supplier and workplace assessments*, <https://verite.org/expertise/supplier-and-workplace-assessments/>.
- ^{xxxii} Mekahlo Medina, Jonathan Lloyd, *New report estimates the economic impact of 2028 LA Olympics for 5 counties*, NBC LA, (2028 Olympics predicted to have \$13-18B in economic regional impact, with a budget of around \$6.9B) (Dec. 4, 2025), <https://www.nbclosangeles.com/olympics-2028-los-angeles/olympics-la-county-economy/3811740/>; Rory Carroll, *Los Angeles Olympic organizers top \$2 billion in commercial revenue*, Reuters, (Dec. 4, 2025), <https://www.reuters.com/sports/los-angeles-2028-olympic-organizers-top-2-billion-commercial-revenue-2025-12-04/>; Inside FIFA, *Unprecedented revenue target to make football truly global* (FIFA 2023-2026 Budget Cycle projected to generate record revenue of over \$13B), <https://inside.fifa.com/official-documents/annual-report/2024/financials/revised-2023-2026-budget>.
- ^{xxxiii} Carroll, *supra*.

