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EVALUATING THE COST OF HUMAN TRAFFICKING OPERATIONS

Understanding Who is Affected, What These Operations Cost, and What Outcomes They Produce



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EVALUATING THE COST AND IMPACT OF HUMAN TRAFFICKING ENFORCEMENT OPERATIONS:

Understanding Who Is Affected, What These Operations Cost, and What Outcomes They Produce



By: Paloma Bustos

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INTRODUCTION

Public discussion on human trafficking has often centered the use of law enforcement operations as a key response to identify and "rescue" survivors, hold traffickers accountable, and prevent further exploitation. In turn, arrest and "rescue" numbers are frequently presented as evidence of success and used to support continued enforcement operations and funding. Yet available reporting does not provide a complete picture of who is affected by these operations, what they cost, or what outcomes they produce.

Understanding these outcomes is especially important because enforcement operations can affect more people than suspected traffickers. Those encountered during these operations may include trafficking survivors, people experiencing other forms of abuse and/or exploitation, and people voluntarily engaged in commercial sex. These operations may also affect communities that already face greater barriers to safety and accessing services, including those experiencing poverty or housing instability, immigrants, LGBTQ+ individuals, and people of color. Without better data, it is difficult to determine whether these operations are achieving their intended goals of identifying survivors, preventing trafficking, and protecting public safety.

WHAT AVAILABLE DATA SHOWS

Operation Reclaim & Rebuild, an annual statewide, multi-agency enforcement operation focused on sex trafficking and commercial sexual exploitation, provides one example of what current reporting shows and what it leaves unanswered. In 2025, this operation took place over seven days with participation from 107 law enforcement agencies statewide, including the Los Angeles Sheriff Department (LASD) and the Los Angeles Police Department (LAPD). Participating law enforcement agencies reported 547 arrests, including 212 people categorized as commercial sex workers, representing approximately 39% of all arrests reported for the operation. During the same operation, 177 individuals were reported as

"rescued."[1]

Measure	Reported Number
Duration of operation (calendar days)	7
Participating law enforcement agencies	107
Statewide arrests	547

However, the available data does not show whether these operations help or harm victims and vulnerable community members, or what these operations cost at the local and statewide levels. What the available data do clearly show is that most reported arrests are **not** for human trafficking charges, and less than 10% involve people categorized as suspected traffickers or pimps.

Operation Reclaim & Rebuild – Reported Arrests (2025)

Arrest Category	Number	Percentage of Total Arrests
Commercial sex workers	212	38.8%
Buyers	285	52.1%
Pimping/Pandering/Supervising	48	8.8%
Human Trafficking (Penal Code § 236.1)	0	0%
Total arrests	**547**	**100%**
Reported as "rescued" / identified victims	177	N/A

Note: The listed arrest categories account for 545 of the 547 reported arrests. The remaining two arrests are not accounted for in this breakdown.

In the 2025 operation, approximately 91% of arrests involved commercial sex workers or buyers, while no arrests were reported under California's human trafficking statute (Penal Code § 236.1). These findings raise questions about how the success of anti-trafficking operations is measured, particularly when arrests of individuals who are not necessarily suspected of trafficking others are included in reported enforcement outcomes.

[1] Los Angeles Police Department, "Operation Reclaim & Rebuild," News Release NR25021DM, February 4, 2025, https://www.lapdonline.org/newsroom/operation-reclaim-rebuild-nr25021dm/

Los Angeles County Human Trafficking Task Force Data, 2015–2023

Los Angeles County data reported by the LA Regional Human Trafficking Task Force over nearly a decade show similar concerns about transparency and the ability to assess the overall costs and impacts of anti-trafficking enforcement operations. From 2015 through October 31, 2023, the Task Force reported identifying 487 victims and making 2,681 arrests as part of its sex trafficking enforcement activities.[2] Of those arrests, 987 involved male sex buyers and 416 involved adults categorized as commercial sex workers, together representing approximately 52% of reported arrests. Although the County provides additional arrest categories, the available reporting does not indicate how many arrests resulted in trafficking charges or convictions, whether individuals arrested as commercial sex workers were experiencing trafficking or exploitation, or whether identified victims were connected to services. The report also does not provide the costs of these enforcement activities.

LA Regional Human Trafficking Task Force, 2015 – October 31, 2023

Reported Category	Number	Percentage of Total Arrests	Criminal Prosecution Outcomes
Male sex buyers	987	36.8%	Not reported
Adult commercial sex workers	416	15.5%	Not reported
Pimps/traffickers	493	18.4%	Not reported
Internet perpetrators of CSE	537	20.0%	Not reported
Related arrests	258	9.6%	Not reported
Total arrests reported	**2,681**	**100%**	**Not reported**
Victims identified (adults)	123	N/A	N/A
Victims identified (minors)	364	N/A	N/A
Total victims identified	**487**	**N/A**	**N/A**
Federal Cases Filed	14	N/A	14 Federal cases filed

***Source**: Los Angeles County, Reimagining Los Angeles County's Approach to Human Trafficking (2024), p. 9,*

***Note:** The five categories total 2,691, while the County reports 2,681 total arrests. Percentages use the reported total of 2,681. The County reported 14 federal cases filed but did not identify which arrests led to those cases or provide prosecution outcomes by arrest category.*

[2] Los Angeles County, Reimagining Los Angeles County's Approach to Human Trafficking (2024). https://file.lacounty.gov/SDSInter/bos/supdocs/185170.pdf

Operation Reclaim & Rebuild Arrest Trends, 2022–2026

A significant concern with anti-trafficking enforcement operations is that arrests of sex workers are counted alongside arrests of suspected traffickers and buyers when reporting the results of these operations. Between 2022 and 2025, Operation Reclaim & Rebuild reported 1,948 arrests statewide. Of those arrests, 719, or nearly 37%, involved individuals categorized as commercial sex workers rather than people suspected of trafficking others or buying commercial sex.

Including these arrests in the overall totals can give the public a misleading impression of the operations' success in identifying and holding traffickers accountable. These operations are intended to identify trafficking survivors and those responsible for exploiting them. Yet a substantial share of arrests involves people who may themselves be vulnerable to trafficking or other forms of exploitation.

Arresting these individuals can also increase their vulnerability to future exploitation. Criminal records can create additional barriers to housing, employment, and access to services, making it harder for people to achieve stability and safety. These consequences raise questions about whether enforcement operations are protecting vulnerable individuals or creating additional challenges for the very communities they are intended to help.

Operation Reclaim & Rebuild – Commercial Sex Worker Arrests, 2022–2025

Year	Commercial Sex Worker Arrests	Total Arrests	Share of Total
2022	214	494	43.3%
2023	113	368	30.7%
2024	180	539	33.4%
2025	212	547	38.8%
4-Year Total	**719**	**1,948**	**36.9%**

The most recent data from Operation Reclaim & Rebuild raises additional concerns about transparency. In 2026, 212 arrests, or nearly 35% of the total, were classified as “other,” a much larger share than in previous years. Unlike previous reports, the 2026 data do not separately identify arrests of commercial sex workers.[3] While some of these arrests may be included in the “other” category, the available data do not confirm this. Without a clearer breakdown, it is difficult to

[3] Los Angeles Regional Human Trafficking Task Force, “L.A. Regional Human Trafficking Task Force Announces Arrests and Rescues by CA Law Enforcement During Operation Reclaim and Rebuild,” February 4, 2026. https://scvnews.com/l-a-regional-human-trafficking-task-force-announces-arrests-and-rescues-by-ca-law-enforcement-during-operation-reclaim-and-rebuild/

determine who was arrested and whether the operation continued to criminalize people who may be vulnerable to trafficking or exploitation.

Operation Reclaim & Rebuild – Reported Arrests (2026)

Arrest Category	Number	Percentage of Total Arrests
Males arrested for solicitation (sex buyers)	328	53.7%
Suspected traffickers/exploiters	71	11.6%
Other arrests (categories not specified)	212	34.7%
Total arrests	**611**	**100%**
Reported victims recovered (adults)	156	N/A
Reported victims recovered (minors)	14	N/A
Total reported victims recovered	**170**	**N/A**

Note: Categories reflect the terminology used in the 2026 law enforcement environment. The announcement does not define the categories associated with the remaining 212 arrests or separately identify arrests of commercial sex workers. It also does not identify which criminal charges were filed against suspected traffickers and exploiters.

UNINTENDED CONSEQUENCES OF ARRESTS AND CRIMINAL RECORDS

Arrests during anti-trafficking operations can have consequences beyond the immediate enforcement action. People arrested for conduct connected to trafficking or exploitation may face criminal records that create lasting barriers to education, employment, housing, and custody proceedings. These consequences can also affect people voluntarily engaged in commercial sex and buyers, particularly those already facing poverty, housing instability, and other barriers to safety.

A 2026 *Skid Row Women's Needs Assessment* by the Downtown Women's Action Coalition documented additional concerns about the impacts of policing on vulnerable communities. From 2020 through 2024, LAPD recorded 1,428 arrests of women in Skid Row, including 861 arrests of Black women and 333 arrests of Latina women. Women engaged in sex work also described police harassment, threats of arrest, and barriers to reporting violence. These findings highlight how enforcement practices can create additional barriers to safety and protection for communities already experiencing poverty and housing instability.[4]

[4] Downtown Women's Action Coalition, Skid Row Women's Needs Assessment (2026), pp. 108, 117–120.

California law provides relief for eligible trafficking-related records, but obtaining and implementing that relief can be a lengthy process. For survivors arrested or convicted for conduct connected to their trafficking, navigating the legal process to clear their records can be difficult. Survivors may be required to provide detailed information about their trafficking experience, which can be retraumatizing. Courts must process petitions, determine eligibility, and ensure that records are ultimately sealed or destroyed. Delays can extend the period during which a survivor continues to experience the consequences of a criminal record. These challenges are compounded by limited access to legal assistance and the lack of dedicated County and State funding to help survivors navigate trafficking-related record relief.

The risk of criminalization is further complicated by the fact that trafficking survivors may not be identified during their first encounter with law enforcement. A person may have multiple encounters with law enforcement or service providers before being identified as a trafficking survivor. Research has found that survivors may need time to build trust before disclosing their experiences or accepting support.[5] A single encounter may therefore provide an incomplete picture of whether trafficking is occurring or whether someone may need assistance. A decision not to disclose trafficking or accept services during one encounter should not prevent future opportunities for identification and voluntary support.

ESTIMATING THE PUBLIC COST OF ENFORCEMENT OPERATIONS

The concerns surrounding the costs and impacts of anti-trafficking enforcement operations are not new. In 2021, USC Gould School of Law's International Human Rights Clinic examined anti-sex-trafficking enforcement operations, including those conducted in Los Angeles County. The report found that operations resulted in arrests of people engaged in commercial sex and buyers while identifying relatively few trafficking victims or suspected traffickers. Researchers also documented harmful enforcement practices, including the criminalization and re-traumatization of potential survivors.[6]

[5] U.S. Department of Health and Human Services, Study of HHS Programs Serving Human Trafficking Victims (2009); Identifying and Supporting Trafficked Individuals: Provider and Community Organization Perspectives on Existing Sociotechnical Approaches, Journal of the American Medical Informatics Association (2026).
[6] USC Gould School of Law, International Human Rights Clinic, Over-Policing Sex Trafficking: How U.S. Law Enforcement Should Reform Operations (2021).

KEY FINDING — USC GOULD SCHOOL OF LAW (2021)

"Anti-sex trafficking operations identify few victims or traffickers"

USC researchers found that these operations can result in arrests and harmful treatment of trafficking survivors and sex workers, with disproportionate impacts on marginalized communities

Source: USC International Human Rights Clinic, Over-Policing Sex Trafficking (2021).

What USC Recommended in 2021

- Limit enforcement operations and expand public health approaches.
- Redirect funding toward more effective, less harmful victim identification methods.
- Improve transparency and oversight of enforcement operations.
- Strengthen prevention efforts that reduce vulnerability to trafficking.
- Expand access to comprehensive survivor services.
- Improve coordination between law enforcement, service providers, communities, and sex workers.

Summarized from USC International Human Rights Clinic, Over-Policing Sex Trafficking (2021)

The study also identified significant gaps in transparency. Of the 16 agencies that received public-records requests as part of the study, 11 denied or failed to respond to requests for information about operational funding, arrests, and outcomes. Despite these findings and the report's recommendations for reform, significant questions remain five years later about who is arrested, what happens after an arrest, whether identified victims receive supportive services, and how much these operations cost.

LIMITATIONS IN REPORTING AND DATA COLLECTION

Arrest totals presented as results of "anti-trafficking" operations may give the public a misleading impression of how many trafficking cases actually result from these efforts and their broader impacts on vulnerable communities, particularly when information about trafficking charges, convictions, and other outcomes is not consistently reported.

These reporting gaps are also connected to how law enforcement records are organized and maintained. In response to a public records request, LASD indicated that arrest, booking, and

incident records are generally organized by information such as a person's name, offense, arrest location, deputy, or station, rather than by a specific enforcement operation. This makes it difficult to track what happened to individuals encountered during operations such as Reclaim & Rebuild, including whether someone arrested or cited was later identified as a trafficking survivor or connected to services.

ESTIMATING THE PUBLIC COST OF ENFORCEMENT OPERATIONS

Given Los Angeles County's commitment to a public health approach to addressing human trafficking, it is important, after more than two decades of relying heavily on law enforcement-led interventions, to evaluate the costs and outcomes of operations conducted in the name of preventing trafficking.

An important part of this evaluation is understanding how public resources are being spent and what results those investments produce. While overall law enforcement budgets are publicly reported, the amount spent specifically on anti-trafficking enforcement operations is generally not disclosed. As a result, the public cannot determine how much is being invested in these operations, how much each identified trafficking victim or arrested trafficker costs taxpayers, or whether these expenditures represent the most effective use of limited resources.

Understanding these costs is particularly important because anti-trafficking operations often involve multiple law enforcement agencies and substantial expenditures, including personnel time, overtime, surveillance, transportation, booking, and related operational costs. Yet these costs are not typically reported in a manner that allows policymakers or the public to assess their return on investment.

Without a clear understanding of these expenditures and their outcomes, it is difficult to evaluate whether enforcement-focused approaches are achieving their intended goals or how they compare with alternative investments in prevention, housing, outreach, and survivor services. For example, the County has not publicly reported the cost of identifying a potential trafficking survivor through these operations. Without this information, it is impossible to meaningfully assess the efficiency of current strategies or compare them to community-based approaches designed to reduce vulnerability to trafficking before exploitation occurs.

Illustrating Potential Enforcement Costs

The full cost of individual human trafficking enforcement operations remains unclear, but published law enforcement rates can help illustrate potential expenses.

Los Angeles County's published staffing rates for fiscal year 2025–26 list an hourly cost of

$119.81 for a generalist sheriff's deputy and $157.49 for a sergeant, including liability costs.[7] Using these rates, the following table illustrates what an operation could cost the County under an assumed staffing scenario.

Illustrative Staffing Costs for an Enforcement Operation

Hypothetical staffing: Eight deputies and two sergeants working 10 hours per day.

Deployment Period	Estimated Staffing Cost
1 day	12,734.6
7 days	89,142.2

***Note**: These figures are hypothetical and do not represent actual expenditures for Operation Reclaim & Rebuild. They assume the same ten-person team works 10 hours each day. The estimates exclude additional expenses, including equipment, transportation, overtime adjustments, booking, detention, and prosecution.*

Illustrating Potential Statewide Costs

Because Operation Reclaim & Rebuild is conducted annually across multiple jurisdictions, its potential statewide cost raises additional questions about how public resources are being used.

Using the same hypothetical staffing scenario, if 80 law enforcement agencies each deployed a ten-person team for seven 10-hour days, personnel expenses alone would total approximately $7.1 million. Based on the 71 suspected traffickers or exploiters reported in 2026, this would equal approximately $100,400 in hypothetical staffing costs per suspected trafficker or exploiter arrested.



[7] Los Angeles County Sheriff's Department, Supplemental Law Enforcement Services Rates, Fiscal Year 2025–26, Exhibit A, p. 1.

Illustrative Statewide Staffing Costs – Operation Reclaim & Rebuild (2026)

Measure	Hypothetical Estimate
Law enforcement agencies	80
Officers per agency	10
Hours per day	10
Days of operation	7
Total estimated staffing costs	**$7,131,376**
Reported suspected traffickers/exploiters arrested	71
Estimated staffing cost per suspected trafficker/exploiter arrested	**$100,442**

Note: These figures do not represent actual statewide spending or the actual cost of arresting any individual. They assume each agency deployed eight deputies and two sergeants for 10 hours over seven days, using Los Angeles County's published FY 2025–26 supplemental law enforcement rates. Actual staffing, hours, and costs may differ substantially. Other operational expenses are excluded.

Personnel expenses are also only part of the potential public cost. A December 2025 analysis by the Vera Institute of Justice estimated the average cost of incarceration in Los Angeles County jails at **$342.63 per person per day**.[8] Applying this rate to all 1,948 arrests reported statewide during Operation Reclaim & Rebuild between 2022 and 2025 would result in a hypothetical one-day incarceration cost of approximately $667,443. Of this amount, approximately $246,351 would be associated with the 719 individuals categorized as commercial sex workers, who accounted for nearly 37% of all arrests during this period.

These figures do not represent actual detention expenses, as it is unknown how many individuals were detained, where they were held, or for how long. The estimates apply Los Angeles County's average daily incarceration cost to statewide arrest totals solely for illustrative purposes. However, they highlight additional potential public costs that are not reflected in reported arrest totals, including costs associated with the criminalization of people who may be vulnerable to trafficking or exploitation

These examples demonstrate why the public and lawmakers need more detailed financial reporting. Information about actual city, county, and statewide expenditures, trafficking-related charges and convictions, and services provided to survivors is necessary to determine whether these annual operations are an effective use of public resources or whether similar investments in prevention, community-based outreach, and survivor services could produce better outcomes.

[8] The Vera Institute of Justice, One Year of Proposition 36 (December 2025), p. 3, endnote 4.

WHAT BETTER EVALUATION SHOULD INCLUDE

A strong evaluation framework should look beyond arrest and "rescue" totals. It should examine who is affected, whether potential survivors are identified before unnecessary criminalization, what outcomes result, what these operations cost, and whether people are connected to voluntary support. The following recommendations provide a framework for improving transparency, accountability, and survivor-centered responses.

1. Improve transparency and reporting on human trafficking enforcement operations

City, County, and State law enforcement should report available data on human trafficking enforcement operations for the last 5 years. Reporting should include the estimated cost of each operation, including staffing and deployment costs, overtime, equipment and operational expenses, booking and detention costs, and other identifiable public expenditures; the number of individuals contacted, detained, cited, and arrested by CA Penal code; the number identified as potential trafficking survivors and referred to services; available case outcome, including prosecutions filed directly linked to each operation; the type and setting of the operation; participating agencies; the agency responsible for citations or arrests; and definitions used for terms such as "rescued," "recovered," and "identified as a victim."

Reporting should also identify the estimated cost per potential trafficking survivor identified during each operation in which the County participates.

2. Address gaps in current data collection

Law enforcement should identify limitations in current data systems and develop a standardized method for tracking future human trafficking operations. Tracking should include the number of individuals encountered, detained, cited, or arrested; available demographic information; whether individuals were identified as potential trafficking victims; alleged offenses and case outcomes at one and two years; trafficking cases referred for prosecution, charges filed, and outcomes; whether potential victims were offered confidential access to a victim service provider or attorney; whether they accepted or declined the meeting or referral, where that information can be reported without compromising confidentiality; and the estimated overall cost of each operation in relation to outcomes such as victims identified and voluntarily connected to services. Local governments should also establish regular public reporting of summary data that protects privacy and allows costs and outcomes to be assessed over time.

3. Strengthen identification and prevent unnecessary criminalization

The City, County, and State departments should review existing protocols for identifying

potential trafficking survivors before citation, arrest, or detention. The review should consider trauma-informed screening, language access, privacy, forced criminality, and whether conduct leading to enforcement may be connected to trafficking, coercion, or exploitation. Community-based organizations and compensated survivors with lived experience should be included in this review.

4. Develop a non-coercive response for repeated enforcement contacts

The City, County and State should develop responses for individuals who are repeatedly encountered, cited, or arrested during trafficking operations, including those who decline services or do not wish to engage with law enforcement. A decision not to disclose trafficking or accept services during one encounter should not prevent future opportunities for identification and voluntary, community-based support. Access to services should not depend on participation in an investigation or prosecution.

5. Establish independent review of enforcement practices and impacts

Independent review should examine transparency, survivor identification, data collection, and compliance with City, County and State policies and procedures. Enforcement practices should also be assessed through a public health and trauma-informed framework, including the potential effects of arrest, detention, and criminal records on survivor safety, recovery, and access to services.

6. Compare the costs and outcomes of enforcement with community-based outreach

The City, County, and CA State should compare the costs and results of human trafficking enforcement operations with community-based outreach, prevention, and survivor support programs. This should include how much each approach costs, how many people are reached, how many potential survivors are identified, and how many are connected to voluntary services. This would help the County understand which approaches are most effective in preventing trafficking and supporting survivors.

CONCLUSION

Human trafficking enforcement operations should be evaluated by more than the number of arrests made or people reported as “rescued.” The public should be able to understand who

is affected, what these operations cost, whether potential survivors are being identified and connected to voluntary support, and whether enforcement leads to meaningful trafficking case outcomes. Greater transparency and consistent evaluation are necessary to determine whether these operations are advancing public safety and trafficking prevention without creating unnecessary harm.

To support this effort, the Sunita Jain Anti-Trafficking Initiative has prepared a proposed Los Angeles County motion requesting improved transparency, data collection, and evaluation of human trafficking enforcement operations. The proposed motion is included in Appendix A.

A public health approach to human trafficking requires looking beyond enforcement and investing in strategies that prevent exploitation, reduce harm, and support survivors. Better information about the costs and outcomes of enforcement operations can help policymakers make informed decisions about how public resources are used and whether greater investments in prevention, community-based outreach, and survivor services could achieve better outcomes.

ABOUT SJI

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

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APPENDIX A

Evaluating the Cost and Impact of Human Trafficking Enforcement Operations

Los Angeles County has committed to addressing human trafficking through a survivor-centered public health approach that emphasizes prevention, trauma-informed support, and reducing the criminalization of people experiencing trafficking. Putting that commitment into practice requires examining what happens when people who may be experiencing sex trafficking, labor trafficking, forced criminality, or other forms of exploitation encounter law enforcement during human trafficking operations. It also requires considering the impact of these operations on people who choose to engage in commercial sex. Potential survivors should be identified and connected to voluntary, community-based support rather than unnecessarily arrested or cited. Additionally, arrests of people voluntarily engaged in commercial sex should not, by themselves, be used as a measure of anti-trafficking success.

The County also needs better information about the cost and effectiveness of these operations. This includes the cost of identifying and assisting potential victims, whether individuals voluntarily connect with services, whether investigations result in trafficking charges and convictions, and the longer-term outcomes of those cases. Collecting this information would help the County better understand what it is investing in anti-trafficking enforcement and what results those investments produce.

Existing data from human trafficking enforcement operations involving the Los Angeles County Sheriff's Department (LASD) and the Los Angeles Regional Human Trafficking Task Force (LARHTTF) do not provide a clear estimate of the cost of each operation. They also do not show what proportion of individuals cited or arrested may have been potential trafficking victims or people voluntarily engaged in commercial sex. Without this information, the County cannot fully assess whether these enforcement operations reflect its commitment to prevention, trauma-informed care, and reducing the criminalization of survivors.

Data reported by the Los Angeles Regional Human Trafficking Task Force illustrate this gap. From 2015 through October 31, 2023, the Task Force reported identifying 487 victims and making 2,681 sex-trafficking-related arrests.[1] Of those arrests, 416 involved adults categorized as commercial sex workers, representing approximately 16% of the total. The available reporting does not indicate whether any individuals arrested as commercial sex workers were connected to services, whether they were experiencing trafficking or exploitation at the time of arrest, or whether they had a prior history of exploitation.

Data from the multi-agency Operation Reclaim & Rebuild raise similar questions. In 2025, the operation reported 547 arrests statewide, including 212 people categorized as commercial sex workers, representing approximately 39% of arrests. The operation also reported identifying 177 victims.[2] However, the available data do not show the cost of the operation, whether arrests of suspected traffickers resulted in trafficking charges or convictions, whether individuals identified as victims were connected to or accepted services, or whether people arrested as commercial sex workers may have also been experiencing trafficking or exploitation. Without this information, the County cannot fully assess the cost and effectiveness of these anti-trafficking operations, including whether people experiencing trafficking are being cited, arrested, or detained during human trafficking enforcement operations before or instead of being identified as potential survivors.

The 2026 Operation Reclaim & Rebuild data raise additional concerns about transparency. Of the 611 arrests reported statewide, 328 involved suspected sex buyers, 71 involved suspected traffickers or exploiters, and 212, approximately 35%, were classified as "other." Unlike previous years, the 2026 report did not separately identify arrests of commercial sex workers or specify the offenses associated with the "other" category.[3] This makes it difficult to determine who was arrested, whether individuals experiencing trafficking or exploitation may have been criminalized, and whether enforcement practices have changed over time.

These gaps in reporting are particularly concerning in operations where individuals may be experiencing trafficking or exploitation but are instead cited or arrested. In 2020, the Board adopted the motion *"Providing Outreach to Workers in the Massage Industry,"* recognizing that workers may face trafficking, language and cultural barriers, fear of authorities, and other barriers to seeking help.[4] The motion called for trauma-informed, culturally and linguistically appropriate outreach, education, and connection to services for massage workers. These concerns are also reflected in recent Los Angeles enforcement operations, where workers have been cited for commercial-sex-related conduct in the same locations where other workers were identified as possible trafficking victims. This raises an important question about whether people facing enforcement are also being screened for trafficking and offered voluntary support.

The County's ability to answer that question is limited by how LASD currently organizes and retrieves its records. LASD has reported challenges in retrieving arrest, booking, and incident records tied specifically to Operation Reclaim & Rebuild. Its records are generally organized by information such as the person's name, offense, arrest location, deputy, or station, rather than by the operation itself. These limitations make it difficult to determine whether individuals arrested or cited during the operation were later identified as trafficking survivors or connected to services.

These limitations point to a broader gap in how human trafficking enforcement operations are reported and evaluated. Available reporting does not provide enough information to determine whether individuals arrested or cited were people vulnerable to exploitation, people voluntarily engaged in commercial sex, or individuals experiencing trafficking. Public reporting has also largely emphasized arrest totals without providing enough information about who was arrested, what happened in those cases, how many suspected traffickers were ultimately charged or convicted, or what the operations cost.

This is particularly important because the County has already recognized the consequences of survivor criminalization. Its 2024 *Reimagining Los Angeles County's Approach to Human Trafficking* report found that criminal legal responses can leave survivors with records for crimes committed while under traffickers' control, including forced criminality.[5] The report also noted that criminal records can affect employment, housing, and custody proceedings**.**

These concerns are not new. In 2021, USC Gould School of Law's International Human Rights Clinic examined anti-sex-trafficking enforcement operations, including those conducted in Los Angeles County. The study found that these operations resulted in arrests of people engaged in commercial sex and buyers while identifying relatively few trafficking victims or suspected traffickers. Researchers also documented harmful enforcement practices, including the criminalization and re-traumatization of potential survivors, as well as significant gaps in transparency and reporting.[6]

For trafficking survivors, these consequences can be significant. Survivors may be criminalized for conduct connected to their exploitation, adding to existing trauma and create additional barriers to safety and recovery. It can also place the burden on survivors to later navigate a legal process to clear arrests or convictions connected to their trafficking. Relief after the fact does not address whether unnecessary criminalization could have been prevented in the first place. Understanding both the outcomes and impacts of these operations is essential to evaluating their effectiveness as anti-trafficking efforts.

The County's ongoing work to implement a public health approach has also identified improved data collection and program evaluation as important components of that approach. However, the County's 2025 feasibility work focused primarily on using existing data and did not propose new data-collection requirements. The gaps in enforcement reporting demonstrate the need to examine what additional information should be tracked by LASD to determine the overall effectiveness and cost of its anti-trafficking operations.

These concerns are especially timely as training for law enforcement personnel participating in Operation Reclaim & Rebuild is scheduled for December 1, 2026, ahead of the next

operation planned for February 2027. This provides an opportunity to review how information is collected and reported during these operations, including who is contacted, cited, or arrested, whether potential trafficking survivors are identified and referred to services, and what outcomes are tracked. It also presents an opportunity to strengthen screening and referral protocols to prevent unnecessary criminalization and ensure that individuals have access to voluntary support. Establishing consistent data collection and reporting practices before future operations would help the County better evaluate their costs, effectiveness, and impact on survivors.

I, THEREFORE, MOVE that the Board of Supervisors:

1. Improve transparency and reporting on human trafficking enforcement operations.

Request the Sheriff, through the Los Angeles Regional Human Trafficking Task Force, to report back on available data from 2022 through the most recent available year, including 2025, for Operation Reclaim & Rebuild and other human trafficking enforcement operations involving LASD, including:

- Estimated cost of each operation, including staffing and deployment, overtime, equipment, transportation, booking, detention, and other identifiable operational expenses, to the extent available.
- Personnel and staffing costs and other identifiable County expenditures, including expenditures by participating agencies where available.
- Number of individuals contacted, detained, cited, and arrested.
- Number identified as potential trafficking survivors.
- Number offered a confidential referral to voluntary services, and number accepting or declining, where reporting does not compromise confidentiality.
- Arrest or citation offenses.
- Available case outcomes, including trafficking referrals for prosecution, charges filed, and convictions where available.
- Type and setting of the operation.
- Participating agencies.
- Agency responsible for citations or arrests.

- Definitions of “rescued,” “recovered,” and “identified as a victim.”
- Estimated cost per potential trafficking survivor identified for each operation involving the County.
- Breakdown of citations and arrests by California Penal Code section and reported arrest category, including an explanation of any arrests categorized as “other.”
- Number of arrests resulting in charges or convictions under California Penal Code § 236.1, where available, distinguished from arrests for other offenses.

2. Address gaps in LASD’s current data collection.

Request LASD and LARHTTF to: (1) identify limitations in their current data systems and (2) develop recommendations for a standardized method of tracking future human trafficking enforcement operations. The tracking should include information needed to assess the cost and effectiveness of these operations, including:

- Number of individuals encountered, detained, cited, or arrested, including available demographic information and whether an individual was identified as a potential trafficking victim.
- Alleged offense associated with each citation or arrest, and available case outcomes at one year and two years.
- Number of trafficking cases referred for prosecution, charges filed, and available outcomes at one year and two years.
- Number of potential victims identified and whether they were offered a confidential opportunity to meet with a victim service provider or attorney.
- Whether individuals accepted or declined the meeting or referral, where this can be reported without compromising confidentiality.
- Estimated overall cost of each operation, including an itemized breakdown of staffing, overtime, equipment, operational expenses, booking, detention, and other identifiable public costs.
- Cost in relation to outcomes, including estimated cost per potential survivor identified and the number voluntarily connected to services.

- Recommendations for assigning a unique identifier to each enforcement operation so that contacts, citations, arrests, referrals, case outcomes, and expenditures can be linked to the operation.

- Recommendations for consistent arrest categories and definitions across operations, including separate reporting for commercial sex workers, suspected traffickers or exploiters, buyers, and arrests classified as "other."

The report should also recommend a process for regular public reporting of summary data that protects individual privacy and permits comparison of costs and outcomes over time.

3. Strengthen identification and prevent unnecessary criminalization during human trafficking enforcement operations.

Direct appropriate County departments, in consultation with LASD, County Counsel, community-based organizations, and compensated survivors with lived experience, to review existing protocols for identifying potential trafficking survivors during enforcement operations and determine whether additional protections are needed before citation, arrest, or detention, particularly for adults encountered in workplaces or other settings where trafficking or exploitation may be occurring, and individuals who may be experiencing forced criminality.

The review should consider:

- Trauma-informed screening and identification services.

- Language access and privacy protections.

- Whether conduct leading to citation, arrest, or detention may be connected to trafficking, coercion, or exploitation.

- Opportunities to identify potential survivors and connect them with voluntary support before unnecessary criminalization.

4. Develop a non-coercive response for individuals with repeated enforcement contacts.

Direct the Department of Public Health, in consultation with LASD, LARHTTF, appropriate County departments, community-based organizations, and survivors with lived experience, to develop recommendations for responding to individuals who are repeatedly encountered, cited, or arrested during human trafficking enforcement operations, including individuals who decline services or do not wish to engage with law enforcement.

A person's decision not to disclose trafficking or accept services during one encounter should not, by itself, be treated as evidence that trafficking is not occurring or prevent future opportunities for support.

Recommendations should identify ways to provide repeated, voluntary opportunities for trafficking identification and connection to community-based support without making access to services dependent on participation in an investigation or prosecution.

5. Establish independent review of enforcement practices and their impacts

Direct the Office of Inspector General to independently review LASD policies, practices, and available data concerning potential trafficking survivors encountered during human trafficking enforcement operations, including LASD's participation in LARHTTF operations, and identify gaps in transparency, survivor identification, data collection, and compliance with County policies and procedures.

Direct the Department of Public Health, in consultation with appropriate partners, to assess these practices through a public health and trauma-informed framework, including the potential impacts of arrest, detention, and criminal records on survivor safety, recovery, and access to services.

6. Compare enforcement costs and outcomes with community-based outreach.

Direct the Department of Public Health, in consultation with appropriate County departments, LASD, community-based organizations, and compensated survivors with lived experience, to develop a framework for comparing the costs and outcomes of human trafficking enforcement operations with community-based outreach, prevention, and survivor support programs.

The comparison should consider:

- Total expenditures associated with each approach.
- Number of individuals reached.
- Number of potential trafficking survivors identified.
- Number of individuals voluntarily connected to services.
- Other meaningful outcomes related to trafficking prevention and survivor safety.
- Estimated cost per potential trafficking survivor identified and voluntarily connected to services through each approach, where reliable data are available.

The report should identify gaps in available data and recommend a consistent approach to evaluating which strategies best advance trafficking prevention and survivor safety while protecting individuals' privacy.

References

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[3] Los Angeles Regional Human Trafficking Task Force, L.A. Regional Human Trafficking Task Force Announces Arrests and Rescues by CA Law Enforcement During Operation Reclaim and Rebuild, February 4, 2026.
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[6] USC Gould School of Law, International Human Rights Clinic, Over-Policing Sex Trafficking: How U.S. Law Enforcement Should Reform Operations (2021).