



LOS ANGELES COUNTY

CONSUMER & BUSINESS AFFAIRS

Board of Supervisors

June 6, 2025

Hilda L. Solis
First District

Holly J. Mitchell
Second District

Lindsey P. Horvath
Third District

Janice Hahn
Fourth District

Kathryn Barger
Fifth District

To: Supervisor Kathryn Barger, Chair
Supervisor Hilda L. Solis
Supervisor Holly J. Mitchell
Supervisor Lindsey P. Horvath
Supervisor Janice Hahn

Director
Rafael Carbajal

From: Rafael Carbajal
Director

Chief Deputy
Joel Ayala

REPORT ON PREVENTING HUMAN TRAFFICKING IN THE WAKE OF NATURAL DISASTERS (ITEM NO. 19, AGENDA OF APRIL 1, 2025)

On April 1, 2025, the Board of Supervisors (Board) directed the Department of Consumer and Business Affairs (DCBA) to take immediate action to augment resources and coordinate targeted outreach to help prevent individuals economically impacted by the January 2025 wildfires from becoming victims of human trafficking and to report back in writing in 60 days on progress made.¹ As directed in the motion, this effort was to include coordination with the Department of Economic Opportunity (DEO), Department of Children and Family Services (DCFS), Probation Department (PD), and the Department of Public Health's Office of Worker Safety and Health (OWSH), as well as the Los Angeles Regional Human Trafficking Task Force, Los Angeles County Child Trafficking Steering Committee, Los Angeles Worker Center Network, Los Angeles County Sheriff's Department, and Los Angeles County District Attorney's Office (DA).

This report will detail the department's ongoing efforts in this regard and highlight the coordinated actions of its partners as this large coalition continues to focus on this critical issue.

¹ <https://file.lacounty.gov/SDSInter/bos/supdocs/201703.pdf>



dcba.lacounty.gov
dcba@dcba.lacounty.gov

320 W. Temple St., Room G-10, Los Angeles CA, 90012-2706
(213) 974-1452 • (800) 593-8222 • Fax: (213) 687-1137

DCBA's OFFICE OF LABOR EQUITY AND OFFICE OF IMMIGRANT AFFAIRS

As the extent of the damage and destruction caused by the January 2025 wildfires became clear, DCBA, through its Office of Labor Equity (OLE) and Office of Immigrant Affairs (OIA), initiated its anti-trafficking strategy. This included the development of disaster-specific awareness materials for distribution at the Disaster Recovery Centers (DRC) and publication on Department and Countywide Communications platforms.

The OLE kicked off this effort by posting an alert on February 5, 2025 informing the public on how to identify and report labor exploitation and human trafficking.² This new resource, along with other worker's rights education, was also embedded within other DCBA disaster recovery resources, including OIA's extensive "Know Your Rights" digital hub.³ Specially trained OLE and OIA staff were placed at the two DRCs in Altadena and at UCLA, as well as within DCBA's call centers, and at resource hub pop-up events ready to address trafficking concerns. These staff were equipped with anti-trafficking educational materials and intake kits to perform immediate triage, counsel, and referrals to local job centers, day laborer service providers, and, if needed, immigration legal services and representation.

Subsequently in March, DCBA launched a new web page entitled "The Link Between Human Trafficking and Natural Disasters," which provided more substantive resources and links to trainings aimed to assist impacted residents and workers involved in the recovery and reconstruction effort.⁴ The web page also featured connections to support services for trafficking survivors and information on how to report suspected crimes. Links to this resource were featured on DCBA's multiple platforms, including social media, and became a fixture of the daily Coordinated Joint Information Center updates sent out to media outlets, wildfire impacted residents, and other subscribers.⁵

As of the time of this report, DCBA continues to ramp up its anti-trafficking efforts throughout the County, but particularly in the fire impacted areas. This includes merging disaster-specific collateral with existing OLE outreach activity related to enforcement of the County's minimum wage and Prevention of Human Trafficking ordinances. Routine OLE communications to businesses in the unincorporated areas now include information related to trafficking in disaster recovery zones. Mailers and other informative flyers, posters, and community presentations highlight links to OLE's human trafficking web pages. Training videos for disaster workers and first responders are being distributed to departments, including the County's Fire Department, the County Office of Emergency Management (OEM) and PD. OEM will continue to disseminate these materials to other relevant first responder agencies, as appropriate. OLE has also curated a new "trafficking survivor" PSA, providing a victim-focused perspective on recognizing exploitation. This

² <https://dcba.lacounty.gov/wildfires-and-trafficking/>

³ <https://oia.lacounty.gov/kyr/>

⁴ <https://dcba.lacounty.gov/human-trafficking-and-natural-disasters/>

⁵ 3.20.2025 CJIC Update

new video along with all other anti-trafficking material will be made available to partner departments and community stakeholders to use in their own individual outreach efforts.

Concurrently, OIA has also updated its digital platforms and incorporated disaster-related information and resources into its ongoing Mobile Social Services Navigation Program. As undocumented immigrants are the most vulnerable targets for traffickers, OIA has engaged in a broad campaign to spread awareness throughout the community. Efforts include a two-pronged approach that focuses on both the service providers and the impacted communities. OIA has hosted “Know Your Rights” webinars for County employees, Community Based Organizations (CBO) and other service providers, with a cumulative attendance exceeding 10,000 participants. They have also conducted in-person community presentations for disaster-impacted individuals and families at resource fairs and wildfire recovery mobile clinics events. Attendees receive immigration policy updates, information on how to identify *notario* fraud,⁶ and awareness of services provided by other County agencies, legal service providers, and enforcement agencies.

OIA also administers the RepresentLA immigration legal services program, which funds immigration legal service providers in the Labor Trafficking and Workplace Exploitation priority area to provide prospective trafficking survivors with essential legal advice and immigration representation. The RepresentLA Labor Trafficking and Workplace Exploitation legal service providers have conducted numerous workers’ rights presentations, and extensive legal counseling and service provision for fire-impacted workers.

ADDITIONAL COUNTY EFFORTS

DCBA represents only a fraction of the collective effort to spread awareness of human trafficking. Member departments of the Los Angeles Regional Human Trafficking Task Force and Los Angeles County Child Trafficking Steering Committee routinely meet and look to share resources and coordinate efforts, especially in times of emergency. This report highlights some of the ongoing outreach and enforcement work of our county partners:

Office of Worker Health and Safety

As part of its ongoing response to the January 2025 Wildfires, OWHS conducted 10 field visits to burn areas in Palisades and Altadena, reaching 184 workers. Site assessments focused on both observation and compliance support which involved speaking directly with workers and residents, providing informational fact sheets and resources for blood lead testing, and identifying potential needs for referrals to appropriate enforcement

⁶ Notario fraud involves individuals falsely claiming to be legal experts, such as attorneys, to exploit immigrants. The confusion often arises because “notario” means lawyer in some countries, while in the U.S., a notary public cannot give legal advice. This fraud can result in incorrect paperwork, missed deadlines, and false information, causing financial harm and legal problems for victims.

agencies. OWHS identified 58 sites presenting occupational health issues, nine involved concerns about fugitive dust exposure reported to Public Works, and 10 instances of Personal Protective Equipment (PPE) non-compliance reported to Cal/OSHA.

The OWHS outreach strategy includes proactive worksite condition observations via roaming drive-arounds, alongside direct worker engagement at key hubs like food trucks and other lunch areas. In these settings, OWHS distributes PPE and "Know Your Rights" materials, aiming to connect with workers in environments potentially more comfortable and accessible than their primary places of work.

In partnership with National Day Laborer Organizing Network, *Instituto de Educacion Popular del Sur de California* (IDEPSCA), UCLA Labor Occupational Safety and Health Program (LOSH), and Southern California Coalition for Occupational Safety and Health, OWHS is coordinating efforts to offer essential health and safety training for workers involved in wildfire debris efforts. To support this outreach, P100 respirators and other required PPE were secured for distribution at events, along with fit testing and education.

In a collaborative effort with DCBA, state labor agencies, and Public Works, OWHS developed a worker rights poster for display in burn areas. To ensure broad accessibility and understanding among diverse workers, the poster prioritizes visual elements to show necessary PPE. The limited text on the poster conveys critical messaging on required PPE, wage theft prevention, and universal workplace rights, regardless of immigration status.

Providing worker rights education remains a key focus for OWHS through partnerships with 14 trusted CBOs and workers' centers. This outreach targets workers across various high-hazard industries, including workers vulnerable to wage theft and trafficking, such as day laborers, domestic workers, caretakers within Residential Care Facilities for the Elderly, and massage sector workers. Engagement with these CBOs is a critical component of OWHS's strategy to connect with and assist workers at heightened risk of exploitation or trafficking. It is important to note that DPH and DCBA collaborate with many of the same CBOs under a shared goal of improving worker protection and preventing trafficking. OWHS' work is focused on worker health and safety issues, while DCBA's OLE engages with CBOs to inform workers of workplace protections within the County's authority.

Department of Children and Family Services

DCFS is currently implementing a new five-year strategic plan that is integrating labor trafficking information into community outreach materials, the Los Angeles County Human Trafficking website, DCFS policies, and Child Trafficking trainings. Further, DCFS has expanded its partnerships with entities that have expertise in labor trafficking to build knowledge and awareness of specialized services for those impacted by the current and future disasters and to create greater access to resources and support for children and

families impacted by trafficking. Additionally, child welfare prevention and intervention responses to child trafficking victims are currently being incorporated into DCFS policies to increase identification reporting, data collection, and trauma informed care to those who are at-risk or already victims of labor trafficking, regardless of immigration status. DCFS has a contract with the Coalition to Abolish Slavery and Trafficking (CAST) to provide free, countywide training on child trafficking to bring awareness and understanding of the dynamics of trafficking and to provide guidance on conducting a trauma-informed response. DCFS and CAST launched a brand-new “Human Trafficking of Minors 101” on March 6, 2025, providing an integrated, comprehensive training on child trafficking. This new training is available for County staff, partners, law enforcement, and the public.

DCFS also continues to work with Loyola University – Sujita Jain Initiative, CAST, Department of Public Health (DPH), LAUSD, Preventing and Addressing Child Trafficking (PACT) Project, and the Office of the County Counsel’s Affirmative Litigation and Consumer Protection Division to update the County’s human trafficking website to include resources that address trafficking during natural disasters. Updates will include new information and resources related to youth worker’s rights, enhanced training opportunities with links to on-demand human trafficking videos and materials hosted on PACT Project websites, and the inclusion of the free child trafficking training registration website. All resources made available on the website will also be distributed to partners, contractors, and DCFS Regional Community Alliances in all service planning areas.

Los Angeles District Attorney

The Labor Justice Unit (LJU) of the DA brings several years of prosecutorial experience in labor exploitation cases. In addition to their litigation efforts, they play a central role in convening and leading collaborative working groups comprised of key stakeholders across multiple sectors. These include labor unions, worker advocacy organizations, the California Department of Industrial Relations (DIR), California Civil Rights Division, U.S. Department of Labor (DOL), Homeland Security Investigations, City Attorneys, the California Attorney General’s Office, local law enforcement, nonprofit legal services, and academic institutions.

In response to the January 2025 wildfires, the DA has established a specialized interagency working group, the Rebuild LA Labor Exploitation Taskforce, leveraging pre-existing networks to coordinate efforts. This taskforce includes DCBA, DIR, DOL, County Counsel, AG, and the Contractors State License Board (CSLB). It is focused on intelligence sharing, avoiding duplication of efforts, maximizing coordinated responses, and strategically utilizing agency-specific expertise to support victims efficiently. This structure improves case triage, ensures broader coverage, and integrates diverse resources, such as data analysis, academic research, and cross-jurisdictional lessons learned.

Given the limited staffing of the LJU, which consists currently of two part-time trial attorneys and one supervising attorney, the DA is also developing charge evaluation guidelines for distribution to Line Operation Deputy District Attorneys (DDAs). These guidelines will outline applicable charges and best practices for filing and prosecuting labor exploitation and wage theft cases. This initiative is designed to expand the DA's prosecutorial impact by empowering a broader pool of prosecutors with specialized knowledge, allowing the LJU to focus on complex, high-impact cases without leaving lower-level cases unaddressed.

Department of Economic Opportunity

On April 14th, DEO launched its Fire Recovery and Resilience Workforce Program which provides immediate hiring and training support for impacted and dislocated workers from the January 2025 wildfires.⁷ Staff connect with both workers and businesses, helping individuals secure temporary paid work assignments and job training, while assisting employers interested in accessing hiring and training services. DEO has worked closely with the program's oversight team at the America's Job Center of California (AJCC) to foster participant awareness of County anti-trafficking resources.

DEO also continues to collaborate with OIA and other departments to raise public awareness and strengthen outreach, leveraging the Impacted Worker and Family Recovery centers and other appropriate population serving locations, including Worker Center Network organizations such as the Pilipino Worker Center. Engagement continues to activate additional partners and networks to provide education, including "Know Your Rights" trainings and information on the warning signs of trafficking.

BARRIERS ENCOUNTERED

Apprehension of victims to engage with anti-trafficking programming, particularly those with potential immigration issues, continues to be a considerable barrier to connecting victims with much needed assistance. Fear of federal immigration enforcement in our immigrant communities serves only to heighten an inherent mistrust of government entities. Undocumented workers that lost their jobs or had their hours cut as a result of the fires have little recourse and are generally wary of seeking new employment given the current political environment. OIA, through its outreach, sought to connect undocumented workers to legal service providers to assess the individual's circumstances and determine if they could qualify for immigration relief and perhaps a legal pathway to future work authorization, but found there was little enthusiasm to engage or follow up with counselors. More than ever, community partnerships and stakeholder collaborations are vital to strengthening resource networks, increasing trust and access, and reducing barriers to critical services for immigrant populations.

⁷ <https://opportunity.lacounty.gov/FireWorkforce/>

Funding and staffing challenges continue to limit the County and its community partners. For example, partners like Access to Prevention Advocacy Intervention & Treatment provide essential human trafficking prevention and intervention, including vital Mandarin-specific support for highly vulnerable individuals (such as those trafficked into labor or commercial sex), but their efforts are constrained by funding and resource limitations. Proposed budget cuts to the City of Los Angeles Day Laborer Centers will likely exacerbate gaps in existing programming. The competitive nature of the day labor market leads some workers to prioritize job acquisition over safety certifications. A lack of clear pathways or incentives for trained workers to secure safe employment remains an ongoing concern. If these cuts came to pass, an organization like IDEPSCA would have to close its Van Nuys, Cypress Park, and Harbor Community Job Centers, which would dismantle essential protections for vulnerable day laborers and domestic workers at greater risk of exploitation and human trafficking, particularly in the unregulated labor markets that can follow wildfires.

On the enforcement side, the DA's primary challenge is a shortage of trained criminal investigators and prosecutors to handle labor exploitation and human trafficking cases. With significant understaffing in the primary investigative agencies in Los Angeles, it is often difficult to convert civil or administrative investigations into criminal cases. Responding adequately to citizen complaints remains a systemic challenge.

Additionally, OWHS staffing capacity limits their ability to gather detailed violation data requested by Cal/OSHA. OWHS also lacks qualified personnel to conduct required medical clearance of PPE, fit testing logistics, and identification of potential usability issues, which can present some hurdles while educating workers in the field. Securing accessible locations for PPE storage near worker hubs also remains a challenge. In efforts to address limited capacity, OWHS is partnering with the UCLA Southern California Education and Research Center, UCLA Labor Occupational Safety & Health Program (LOSH), and IDEPSCA throughout June to provide fit testing and medical clearance to day laborers receiving P100 elastomeric respirators at job centers in Cypress Park and Van Nuys.

Of particular concern is the trend of homeowners, more so in the Palisades burn area, opting out of Army Corps of Engineers sponsored debris cleanup and instead hiring private contractors. This contributes to more informal and less closely regulated work environments. In these settings, the OWHS team has observed inconsistent or entirely absent use of PPE among workers. It is understood that precarious employment conditions, common within the construction industry, may compel workers, even those aware of their rights, to not exercise them due to fear of retaliation and potential job loss. These factors demonstrate that worker education on safety and rights alone won't ensure compliance. Enforcement actions that hold employers accountable are also needed.

County Counsel's Affirmative Litigation and Consumer Protection Division's Worker Protection Team continues to follow up on leads regarding worker exploitation in the Eaton burn area and vicinity. There have been reports of out-of-state workers being lured to California under false promises, the use of multiple unlicensed contractors to exploit temporary workers, and the use of unscrupulous third-party employers by allegedly legitimate businesses. At a minimum, these conditions pose potential short-term and long-term health risks faced by a non-union workforce engaged in recovery-related activities such as hazardous waste removal without proper PPE as observed by OWHS and others.

NEXT STEPS

Continued Stakeholder Engagement and Readiness

It remains critical that the County's collective effort continues to build and enhance relationships in the anti-trafficking space, maintaining close communication with all stakeholders, including construction and trade associations involved in the rebuild, and CBOs that are committed to assisting exploited and trafficked workers in need of help with legal issues, immigration issues, housing, job assistance, and financial resources. In the rare instance when victims do come forward, we must be ready and prepared to assist responsibly.

Outreach Education and Worker Support

OWHS will continue pivoting to worker hub outreach for broader engagement while ensuring ongoing, prominent display and dissemination of the worker rights posters co-branded between DCBA, DPH, and Cal/OSHA across the Eaton and Palisades burn areas. OWHS intends to maintain targeted worker rights education through its CBO partnerships, with plans to initiate collaborative health and safety training alongside community and academic partners, incorporating a Train-the-Trainer module specifically for staff at day laborer centers. Furthermore, they will partner with UCLA to manage the distribution of P100 respirators, accompanied by required fit testing and essential product safety education.

OIA will continue its targeted outreach and community engagement with individuals, households, and workers from and near the affected areas including maintaining partnerships and collaborations with trusted faith-based partners, social services providers, and worker advocates.

OLE is pursuing a new partnership with the Los Angeles Worker Center Network to conduct a worker and employer outreach, education, and support campaign. Objectives of this new campaign, while broad in scope, will develop and incorporate disaster-specific content and direct both digital and community engagement to include fire-impacted populations in the unincorporated areas of the County. Outreach and education will be

targeted to worker communities that represent low wage earners, trafficking victims, and historically disenfranchised communities. The Los Angeles Worker Center Network would potentially perform multilingual workshops, webinars, trainings, labor rights counseling, claims evaluation and referral services, and host a large-scale public event.

Employer Engagement and Enforcement Strategies

OWHS will develop specific outreach and enforcement strategies for employers, focusing on responsibilities, fair wages, and distribution of PPE. They will also explore and potentially develop solutions for post-training job placement and employer incentives, including the potential fast-tracking of building permits for compliant employers using trained workers. Observation of the disaster areas will continue with relevant agencies (South Coast Air Quality Management District, DCBA, Health Hazard Materials Division) to monitor conditions and share intelligence, while also coordinating with Cal/OSHA to reduce redundancy and expedite investigations, collaboration, and information flow as needed.

As directed by your Board, OLE is also actively engaging with the Internal Services Department and will issue out reminders to all County registered vendors and third-party employers of the County's Zero Tolerance Policy on Human Trafficking and including resources on how to spot signs of exploitation. A similar message will also go out to the County's network of contract managers to reassert the need to consider the trafficking policy in contract monitoring activities.

Training and Capacity Building

DCFS will continue free human trafficking trainings, both online and in-person, during a newly extended contract with CAST that extends through April 30, 2026. In addition, a new request for proposal will be released by July 2025 to establish a new Human Trafficking Training Services contract to further the goal of increased identification and support of those impacted by trafficking, including those who are vulnerable during natural disasters.

In addition, DCFS and PD will provide enhanced prevention education and awareness to system-involved youth to divert youth from becoming victims of trafficking and exploitation. Youth living at home, in placement, transitional housing, and detention facilities will have the opportunity to engage and participate in education and awareness activities for both labor and sex trafficking. The goal is to launch this enhanced curriculum by August 1, 2025.

PD will also distribute Human Trafficking Indicators Training to all contracted service providers working with juvenile and adult probationers, reinforcing compliance with the County's Zero Tolerance Policy on Human Trafficking. This includes strict prohibitions against severe forms of trafficking, forced labor, withholding identity documents, deceptive recruitment practices, charging recruitment fees, providing substandard

housing, failing to cover return transportation costs, and not providing required employment documentation.

In addition, PD will ensure all staff receive this information and will mandate completion of the Human Trafficking Indicators Training. This commitment is aimed at educating staff and equipping them to recognize, respond to, and share critical information on labor trafficking with those under their supervision.

The DA is exploring specialized training for local law enforcement agencies, with a focus on jurisdictions most affected. These agencies include the Pasadena Police Department, the Lost Hills, Altadena, and Crescenta Valley Stations of the Los Angeles County Sheriff's Department, and the West Valley, Van Nuys, Pacific, and West Divisions of the Los Angeles Police Department. The proposed training will be conducted at two levels: a patrol-level roll call briefing to promote basic recognition and referral, and a more comprehensive curriculum for detectives to support full criminal investigations and filings.

In addition, the DA plans to integrate local law enforcement agencies into the targeted taskforce to enhance their role in investigative efforts and bridge current capacity gaps. This is especially critical as regulatory agencies such as DIR, DCBA, and CSLB have very limited criminal investigative capacity and were already operating at full capacity prior to recent disasters.

Employment Services and Anti-Trafficking Integration

DEO is looking to leverage its High Road Training Partnerships program, which connects job seekers with industry-informed job training opportunities in high quality jobs and career pathways, to promote anti-trafficking awareness. Twenty organizations will be funded to provide training starting July 1, 2025, many of which will focus efforts within the domestic workers and construction industries, sectors particularly prone to trafficking activity. Plans are also underway to incorporate relevant anti-trafficking expertise into the initial services of the department's upcoming Center of Excellence to be located at the AJCC in the East Los Angeles/West San Gabriel Valley. Programming at this new center will be focused on serving immigrants and refugees, addressing barriers to employment unique to this vulnerable population with the intent to eventually share expertise with all AJCC locations.

Collaboration with Legal Service Providers

The OIA will continue to work with RepresentLA and the Mobile Immigration Program Legal (and Case Management) service providers to encourage active engagement with taskforce members and worker advocates. These partnerships are essential to respond to emerging needs including those requiring urgent operations to support workers suspected of workplace exploitation or trafficking.

Ongoing Updates and Strategic Alignment

Looking ahead, OIA and OLE will work with taskforce members to update its workers' resources pages at a consistent cadence to reflect new services, policy updates, and worker priorities. This will include the potential incorporation of recommendations pending from the Chief Executive Office in response to your Board's motion of February 4, 2025 "*Moving Forward with Recommendations to Reimagine LA County's Approach to Human Trafficking*" that will set a new standard for how the County combats labor and human trafficking and guide future efforts of DCBA and the broader coalition.⁸

If you need additional information, please contact me or Rose Basmadzhyan, Deputy Director of the Office of Labor Equity at RBasmadzhyan@DCBA.lacounty.gov or Rigo Reyes, Executive Director of the Office of Immigrant Affairs at RReyes@DCBA.lacounty.gov.

RC:JA:EV
CO:RB:RR:ph

c: Executive Office, Board of Supervisors
 Chief Executive Office
 County Counsel
 District Attorney
 Sheriff
 Children and Family Services
 Economic Opportunity
 Internal Services
 Public Health
 Probation

⁸ <https://file.lacounty.gov/SDSInter/bos/supdocs/199931.pdf>