



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
10.		Favor	Nicholas Lampros	Bet Tzedek Legal Services submits the attached letter in strong support of Agenda Item No. 10, the Motion to move forward with the recommendations to reimagine Los Angeles County's approach to human trafficking.
			Paloma Bustos	
		Item Total	2	
Grand Total			2	

January 14, 2025

Board of Supervisors
County of Los Angeles, California
Kenneth Hanh Hall of Administration
500 West Temple Street
Los Angeles, CA 90012



***Re: Agenda Item 10, Motion by Supervisor Hilda L. Solis
Public Comment in SUPPORT of Moving Forward with Recommendations to
Reimagine Los Angeles County's Approach to Human Trafficking***

For the Board's January 14, 2025 Meeting, Agenda Item No. 10

To the Distinguished Members of the Board of Supervisors:

On behalf of Bet Tzedek Legal Services, we write in strong support of Agenda Item No. 10, the Motion to move forward with the recommendations to reimagine Los Angeles County's approach to human trafficking.

Bet Tzedek is a non-profit legal aid organization that has provided free legal services to low-income residents of Los Angeles for the past 50 years. We are particularly interested in this Motion because of our longstanding work to combat labor exploitation and human trafficking through our Employment Rights Project and our coalition work as part of the Los Angeles Regional Human Trafficking Task Force. Beyond our work in combating labor exploitation and human trafficking, we represent low-income individuals—regardless of immigration status—in a variety of other legal issues, including: helping undocumented children connect with their legal guardians to ensure their wellbeing and obtain Special Immigrant Juvenile Status, asylum, or other forms or relief to remain safely in the United States; defending tenants in unlawful detainer proceedings; and protecting seniors and dependent adults through advanced planning, healthcare and benefits consultation, and elder abuse and fraud protection.

We fully support the proposed creation of a countywide human trafficking prevention coordinating body and the establishment of a systematic data collection and sharing framework. These recommendations align with our mission to ensure that vulnerable individuals, particularly individuals in immigrant and marginalized communities, have equitable access to justice.

Specifically, we commend the Motion's emphasis on collaboration across County departments, agencies, and community-based organizations (CBOs)—a collective approach is crucial to effectively address the multifaceted issue of human trafficking. In fact, one of our current human trafficking cases came to us because of such a collaboration. One of our partner organizations recently referred a case to us where the Defendants lured our client, Ms. G, to the United States with false promises about pay and her ability to return home when she desired. After she arrived, they confiscated her passport and forced her to work unacceptably long

hours—sometimes 18 hours a day, all without pay or the breaks required by California law. They controlled her for years through fraud, coercion, and mental abuse. While Bet Tzedek is proud to work with her and seek monetary compensation for the exploitation she faced, not everyone is able to access legal services. Having a countywide human trafficking prevention coordinating body could help support wraparound services for survivors, as well as work to prevent human trafficking from ever happening in the first place.

Accordingly, we would like to be involved and play an active role in these important and impactful efforts. Over the years, Bet Tzedek has litigated many labor exploitation and human trafficking cases, represented survivors as victim's advocates in criminal proceedings, counseled clients through their recovery process, and educated countless individuals about their rights. As a member of the Los Angeles Regional Human Trafficking Task Force, we are eager to provide technical assistance or insight on any related issues.

Bet Tzedek appreciates this Board's past work to address human trafficking and encourages a continuation of this valuable work. Passing this motion is an important step forward in creating a more equitable and effective response to human trafficking in Los Angeles County, and we strongly encourage the Board's support of the Motion.

Sincerely,

Mary Tanagho Ross

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January 14, 2024

Los Angeles Board of Supervisors
Kenneth Hall Administration
500 W. Temple Street, Room 381-B
Los Angeles, CA 90012

Reference: **Motion by Supervisor Hilda L. Solis**
Moving Forward with Recommendations to Reimagine LA County's Approach to Human Trafficking

Dear Esteemed Members of the Los Angeles County Board of Supervisors,

On behalf of the Sunita Jain Anti-Trafficking Initiative (SJI), I am writing to express our strong support for the proposed feasibility studies to establish a countywide human trafficking prevention coordinating body and a systematic data collection and sharing protocol.

Human trafficking remains a pressing issue impacting individuals from all walks of life in Los Angeles County. A coordinated data collection system is not merely a technical tool—it is an **essential foundation** for designing prevention and intervention strategies that are survivor-centered, trauma-informed, and equity-driven. Furthermore, making this data publicly available on an annual basis ensures transparency and accountability. This approach will empower the community while ensuring that survivors are truly seen, supported, and empowered.

In addition to a coordinated data collection system, the County needs to invest in baseline data on the prevalence and dynamics of human trafficking in Los Angeles. It has been over 20 years since the issue of conducting a prevalence study on human trafficking in Los Angeles County was first raised, yet no concrete action has been taken. This lack of data has left us without a clear understanding of the problem, or the tools needed to address it effectively. The time is now for the County to allocate \$1.5 million to fund this critical effort. While this amount may seem significant during these challenging budgetary times, it pales in comparison to the resources currently spent combating human trafficking without the critical data needed to manage and resolve the issue strategically.

Thus, in addition to supporting the motion, the Sunita Jain Anti-Trafficking Initiative urges the County to allocate \$1.5 million to fund a prevalence study. Completing a comprehensive trafficking prevalence study will help Los Angeles area officials combat trafficking and serve survivors by:

1. Collecting demographic data on individuals experiencing human trafficking, including information on gender, race, age, and type of human trafficking.
2. Identifying geographic areas and hot spots where human trafficking is most prevalent.
3. Understanding high-risk industries experiencing human trafficking, including human trafficking for forced criminality.



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For Los Angeles County, this study would be transformative. The County's large size, diverse population, and unique challenges, such as its role as a hub for immigration and labor industries, make accurate data crucial. Further, this type of baseline data is necessary as the County shifts to a public health prevention focus to combat human trafficking. It will help Los Angeles to:

1. Develop targeted prevention programs, including outreach in vulnerable communities.
2. Enhance training for first responders to recognize trafficking indicators.
3. Provide insights on most effective ways to allocate resources to address this hidden issue within our community.
4. Identify and strengthen key partnerships and collaborations needed to prevent trafficking and support survivors.

This funding request aligns directly with the Los Angeles Board of Supervisors' adoption of a long-term public health approach to trafficking. Only through collaboration among County departments, community-based organizations, and survivors themselves can we address the root causes of human trafficking, such as economic instability, immigration vulnerabilities, and systemic inequities. By doing so, we can prevent human trafficking in our county and drive meaningful, lasting change. Funding the first-ever prevalence study in Los Angeles County is a critical step toward achieving this goal.

I respectfully urge the Board to approve this motion and prioritize the allocation of funds for a prevalence study. With accurate data and a coordinated prevention effort, Los Angeles County has the chance to lead the nation in rethinking how we address and ultimately end human trafficking.

Lastly, Sunita Jain Anti-Trafficking Initiative emphasizes the critical need to proactively protect workers from trafficking, especially following natural disasters. Given the evidence that labor trafficking increases after such events, the County must integrate these prevention strategies into its coordinated response as it enhances its efforts in the coming months. Implementing preventive measures before trafficking occurs is essential to a public health approach. We have attached SJI's full recommendations on this matter for your consideration (*Attachment A*).

Thank you for your leadership and commitment to addressing this urgent issue.

Sincerely,

Paloma Bustos, MSW

Policy Associate

[Sunita Jain Anti-Trafficking Initiative](#)

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ATTACHEMENT A

PROTECTING WORKERS FROM TRAFFICKING IN DISASTER RELIEF EFFORTS

The link between human trafficking and responses to natural disasters is well-documented.¹ One of the largest labor trafficking cases in the United States, *David et al. v. Signal International LLC et al.*, involved individuals recruited to rebuild and repair oil rigs and marine facilities damaged by Hurricane Katrina nearly 20 years ago. A 2024 study further highlighted this connection, revealing a significant prevalence of labor trafficking among construction workers engaged in post-disaster recovery. Specifically, surveys of 903 construction workers in Houston, conducted between August 2022 and August 2023, found that over 77% had experienced either labor trafficking or labor exploitation while working in construction. Based on these findings, researchers estimated that more than one in five construction workers in Houston have experienced labor trafficking in the construction industry during their lifetimes.²

The construction industry is consistently among the top sectors for identified labor trafficking cases. For instance, in 2021, the National Human Trafficking Hotline reported that the most common industries for labor trafficking were domestic servitude, agriculture, and construction (NHTH, 2022). Additionally, a 2014 study focusing on undocumented migrant workers in San Diego found that labor abuses were most prevalent in construction and janitorial services. (Zhang, Spiller, Finch, & Qin, 2014).

Systemic problems inherent within the construction industry contribute to worker vulnerability. For instance, labor exploitation can occur due to an abundance of workers being misclassified as independent contractors rather than employees, making them ineligible for labor protections such as unemployment and workers' compensation (Galemba, 2023). Additionally, many workers in the construction industry are either undocumented (Passel & Cohn, 2016; Svajlenka, 2020) or have an H-2B guestworker visa (GAO, 2020), both of which are groups more vulnerable to workplace exploitation (Fussell, 2011; Gleeson, 2010; Juravich et al., 2015; Southern Poverty Law Center, 2014). There have also been instances where workers with H-2A visas, intended for agricultural jobs, were illegally redirected to reconstruction efforts.³

As climate change intensifies the frequency and severity of natural disasters, the demand for construction workers in recovery and reconstruction efforts is expected to rise. This escalating

¹ Katherine Hoogesteyn, et. al. *The Intersection of Human Trafficking and Natural Disasters: A Scoping Review TRAUMA, VIOLENCE, & ABUSE 2024*, Vol. 25(4) 2877–2890. Available at [hoogesteyn-et-al-2024-the-intersection-of-human-trafficking-and-natural-disasters-a-scoping-review.pdf](https://www.hoogesteyn-et-al-2024-the-intersection-of-human-trafficking-and-natural-disasters-a-scoping-review.pdf)

² Kelle Barrick et al. Labor Trafficking in Construction During the Recovery and Reconstruction from a Natural Disaster (Sept. 2024) at 5. Available at https://www.acf.hhs.gov/sites/default/files/documents/opre/opre-HTPRAP-natural-disasters-oct24_0.pdf

³ Department of Health and Human Services, *Trafficking Prevention and Disaster Response* at 10 (Feb. 2018). Available at <https://nhttac.acf.hhs.gov/sites/default/files/2020-02/Trafficking%20Prevention%20and%20Disaster%20Response%20Literature%20Review.pdf>



need underscores the critical importance of addressing labor trafficking within the construction industry. Alarming, the same 2024 study in Houston revealed that 32% of workers in post-disaster construction reported experiencing labor trafficking, compared to 22% of the overall sample. These workers also faced higher rates of withheld pay or benefits, illegal recruitment fees, and threats of violence or denunciation to authorities. For instance, 25% paid illegal recruitment fees to secure these positions. Additionally, post-disaster relief workers also reported higher rates of threats of physical violence (6% vs. 1%), threats of harm to a personal or professional reputation (5% vs. 1%), and threats of denunciation to authorities (3% vs. 1%).⁴ These findings highlight the heightened vulnerability of construction workers in post-disaster scenarios and the urgent need for protective measures to prevent labor trafficking in such contexts.

Although no such research has been conducted in California, reports of exploitation and trafficking emerged from the Tubbs and Kincade fires in 2017 and 2019. Domestic workers and day laborers found themselves abruptly unemployed, without access to unemployment benefits or government aid, increasing their vulnerability to human trafficking.⁵ Additionally, some workers remained in mandatory evacuation zones to continue earning a living, further exposing themselves to hazardous conditions and potential exploitation.

Even first responders, such as firefighters, have been documented to be vulnerable to human trafficking. According to the American Immigration Council, many firefighters in California are Mexican-born on temporary work visas.⁶ Additionally, up to 30% of those fighting Los Angeles County fire fires are incarcerated individuals earning \$10 a day.⁷

Labor needs and subsequent exploitation following natural disasters extend beyond construction and debris cleanup. Some trafficking victims have been employed in hospitality and maid

⁴ *Id.* at 9

⁵ The Guardian, *Laborers and domestic workers stay behind as thousands flee California wildfires* (2019) Available at <https://www.theguardian.com/us-news/2019/oct/30/california-fires-workers-kincade-easy>

⁶ American Immigration Council, *On the Beat[®]: New Roles and Challenges for Immigrant Police and Firefighters* (Dec 2007) at 3 Available at <https://www.americanimmigrationcouncil.org/sites/default/files/research/On%20the%20Beat%2012-07.pdf>; See also NPR, *Some Of The Firefighters Battling The Caldor Fire Are Mexican Nationals On Work Visas*; (Sept 2021). Available at <https://www.npr.org/2021/09/08/1035224871/some-of-the-firefighters-battling-the-caldor-fire-are-mexican-nationals-on-work->; Jean Guerro, *These people are bearing the brunt of California's Climate Crisis*, LA Times (Oct 2021) Available at <https://www.latimes.com/opinion/story/2021-10-28/farmworkers-immigrants-wildfires-california-climate-crisis>

⁷ Forbes, *Exploitation on the frontlines of L.A.'s raging fires* ((Jan 9, 2025) <https://www.forbes.com/sites/dougmelville/2025/01/09/inmates-makes-up-nearly-a-third-of-those-fighting-la-fires/>



services to accommodate displaced residents.⁸ Furthermore, sex trafficking has been documented to increase post-disaster due to heightened social and economic distress.⁹

Recommendations:

1. **Review Los Angeles County Procurement Policies:** Update procurement policies for all LA County contracted goods to prevent human trafficking. See additional information [here](#).
2. **Review Policies for Disaster Relief Efforts and Construction Workers:** Ensure robust and protective measures are in place to prevent human trafficking during rebuilding efforts. Disaster relief strategies should incorporate human trafficking prevention content.
3. **Support Statewide Legislation:** Protect temporary workers in California, especially those on temporary visas, including first responder firefighters. See additional information [here](#).
4. **Provide Supportive Services:** Offer assistance to domestic workers, day laborers, and others who have lost employment due to fires in Los Angeles, rendering them more vulnerable to sex and/or labor trafficking.
5. **Increase Public Awareness:** Educate the public about the risks of human trafficking in Los Angeles County, particularly in the aftermath of natural disasters, and provide information on available resources.

Protecting workers impacted by the fires and those contributing to rebuilding efforts in Los Angeles is crucial, especially considering the ongoing fires in Los Angeles County. It is imperative to uphold their safety and rights and to implement preventive measures against exploitation.

ABOUT SUNITA JAIN ANTI-TRAFFICKING INITIATIVE

The Sunita Jain Anti-Trafficking Policy Initiative (SJI) is a practitioner-led, survivor-informed, evidence-based, and community-informed think tank that intentionally fills gaps in human trafficking through an intersectional framework that fosters systemic change and progressive policy innovations.

FOR MORE INFORMATION

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⁸ Department of Health and Human Services, *Trafficking Prevention and Disaster Response* at 10 (Feb. 2018). Available at <https://nhttac.acf.hhs.gov/sites/default/files/2020-02/Trafficking%20Prevention%20and%20Disaster%20Response%20Literature%20Review.pdf>

⁹ *Id.* at 9



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