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

## Correspondence Received

MEMBERS OF THE BOARD

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

| | | | The following individuals submitted comments on agenda item: | |
|---|---|---|---|---|
| **Agenda #** | **Relate To** | **Position** | **Name** | **Comments** |
| 44. | | **Favor** | Paloma Bustos | |
| | | **Item Total** | **1** | |
| **Grand Total** | | | **1** | |

**As of: 10/7/2026 9:00:15 AM**

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

October 6, 2026

Los Angeles County Board of Supervisors
500 W Temple St
Los Angeles, CA 90012

**Reference: Reports on the First Responder Protocol and Advocacy Services for Commercially Sexually Exploited Children**
**File ID: 16-1656**

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

The Sunita Jain Anti-Trafficking Initiative appreciates the County's continued efforts to strengthen its response to child trafficking. We support the report's emphasis on a public health approach, voluntary services, and community-based responses. We encourage the County to carry that same approach into the First Responder Protocol.

As currently described, the protocol is activated when law enforcement has a child who is a possible or known victim of commercial sexual exploitation (CSEC) in custody and contacts the Child Protection Hotline. DCFS and an advocate then respond. Since then, the County has adopted a more comprehensive approach to child trafficking. In October 2024, the County approved its *Five-Year Strategic Plan to Prevent and Address Child Trafficking*, which expanded the County's response to address all forms of child trafficking, including labor trafficking and forced criminality. The Plan specifically calls for updating the First Responder Protocol to include a referral process and advocate response for children experiencing labor trafficking. Nearly two years later, that update has still not been completed.

Without an updated First Responder Protocol, CSEC continues to be the primary focus of the County's response process for youth. This can leave youth experiencing forced criminality at greater risk of being treated as offenders when they come into contact with law enforcement for offenses such as theft, drug sales, or other crimes. The Board should therefore prioritize updating the protocol so these encounters can also become opportunities to identify trafficking, screen youth, and connect them to supportive services.

The Board should also work to deprioritize law enforcement as the default first responder for trafficked youth. We encourage the County to strengthen other trusted entry points, including schools, healthcare providers, community-based organizations, outreach workers, outreach workers, drop-in centers, survivor advocates, and community-based mobile crisis teams. These settings can provide additional opportunities to identify trafficking and connect youth to specialized support without first requiring contact with law enforcement.

Loyola Law School
Sunita Jain Anti-Trafficking Initiative
919 Albany St., Los Angeles, CA 90015
Email: anti-trafficking@lls.edu | Phone: (213) 252-7742

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

Finally, we encourage the County to update the title and scope of future reports to reflect its commitment to addressing all forms of child trafficking. The current title, *Reports on the First Responder Protocol and Advocacy Services for Commercially Sexually Exploited Children*, continues to center CSEC. Future reports should reflect the County's broader Five-Year Strategic Plan and include labor trafficking and forced criminality.

We encourage the County to:

- **Review and update the First Responder Protocol within the next six months** to address labor trafficking and forced criminality.
- **Create more community-based pathways** for identifying all forms of child trafficking.
- **Train schools, healthcare providers, youth programs, and other trusted community partners** to identify trafficking and connect youth to services.
- **Track how youth enter the response system**, including whether they can access services without law enforcement involvement.
- **Request that LASD provide annual cost estimates** for its role in identifying and referring trafficked youth through the First Responder Protocol, along with the number of youth identified each year. This should include available data for 2024, 2025, and 2026.

Updating the County's approach in these ways, while also understanding the cost of law enforcement's role in the First Responder Protocol, would be more consistent with the County's public health approach and help ensure that young people can access support through settings they already know and trust.

Sincerely,

Paloma Bustos

Paloma Bustos, MSW
Policy Associate
Sunita Jain Anti-Trafficking Initiative
E-mail: paloma.bustos@lls.edu | Phone: (213) 357-1528