



October 31, 2019

Mr. Pedro Nava
Chairman Little Hoover Commission
925 L Street, Suite 805
Sacramento, CA 95814

RE: Coalition to Abolish Slavery & Trafficking (CAST) Written Testimony for the Little Hoover Commission

Dear Mr. Nava,

I am writing to provide the Coalition to Abolish Slavery & Trafficking’s (CAST’s) recommendations to serve as a resource in supporting California in combating sex and labor trafficking in our state.

Background

CAST was one of the first organizations set up in the United States to address human trafficking at both the grassroots and policy levels. It was founded in response to the discovery of 72 Thai workers who had been kept for seven years in slavery and debt bondage in East Los Angeles in 1998. CAST’s model is a ‘continuum of care’ designed to empower survivors to rebuild their lives - from providing social and legal services to facilitating survivor leadership in the anti-trafficking movement. Cast’s direct work with survivors informs our policy priorities and recommendations at local, state and national levels. Based in Los Angeles, we serve victims of all forms of human trafficking (labor and sex trafficking) - no matter their age, ethnicity, nationality or gender.

Now 21 years old, Cast has become a leader in the anti-trafficking movement in the United States. In 2003, CAST opened the first shelter in the country exclusively for survivors of human trafficking and 2018, we opened a second facility. In 2014, CAST was one of the first organizations given federal funds to provide training and technical assistance to lawyers and social service providers serving survivors across the country. Its clients come from almost every region of the world including Asia, Latin America, Eastern Europe, Africa as well as the United States. In 2017-18, CAST provided services to over 1,300 survivors and their family members - the highest number to date. CAST has also provided thousands of hours of technical consultation and training to organizations working on this issue across the country and internationally. Finally, CAST has

—
BOARD OF DIRECTORS
DR. KATHRYN MC MAHON
FOUNDER AND PRESIDENT
EMERITUS
CAL STATE UNIVERSITY
LONG BEACH
SR. ANNCARLA COSTELLO
PRESIDENT
SISTERS OF NOTRE DAME
PARESS SALINAS
VICE PRESIDENT
OVERBROOK ENTERTAINMENT
MOLLY RHODES
SECRETARY
APPAREL NEWS
BUTCH SCHUMAN
AGRO FARMING CORPORATION
STEVEN HIRSH
MERCANTILE CENTER
MICHAEL SINEL M.D.
CLINIC CARE SANTA MONICA
TABREZ NOORANI
INDIA TAKE ONE PRODUCTIONS
MIKE TROZZO
BISTRO STUDIOS
SR. LISA MEGAFFIN
SISTERS OF NOTRE DAME
KAY BUCK
CEO & EXECUTIVE DIRECTOR

invested in survivor voices in the movement through its survivor leadership programs, National Survivor Network and California-based Resilient Voices.¹

Since 2000, CAST has been instrumental in federal policy efforts to end human trafficking and to serve survivors better. We played an integral role in the passing of the original Trafficking Victims Protection Act of 2000 and every reauthorization since. We worked with federal agencies including the Department of Justice, Department of State, Department of Housing, Department of Health and Human Services, Department of Homeland Security, Department of Transportation, Department of Education and Department of Labor to implement the Federal Strategic Action Plan on Services for Victims of Human Trafficking in the United States from 2013-2017. We believe that combating trafficking requires a coordinated, inter-agency approach, and hope that a similar model can be instituted in California.²

At the state level, Cast works closely with California's legislature and government agencies. Successful measures include securing \$10 million in annual funds for comprehensive victim services, tackling transparency in business supply chains, regulating fraudulent foreign labor recruiters, providing victim access to information through hotline posting, and spearheading criminal justice reform measures to ensure that trafficking survivors are not arrested for crimes their traffickers forced them to commit.³ Since 2012, CAST has hosted the California Legislative Collaborative on Human Trafficking to share information on human trafficking policies across the state.⁴ In 2007, the Assembly Speaker appointed CAST to the California Alliance to Combat Trafficking and Slavery Task Force, which produced the first California Report on Human Trafficking. CAST also served as a member of the 2010 Attorney General Transition Team on addressing the crime of human trafficking. In its effort to coordinate anti-trafficking efforts statewide, CAST has worked closely with the Labor Commission, the Attorney General's Office, the Department of Social Services, and the Department of Fair Employment and Housing.

¹ Full summary of the NSN policy priorities 2017-2020 available here: <https://nationalsurvivornetwork.org/policy-advocacy/>.

² The full strategic federal action plan can be reviewed here at: <https://www.ovc.gov/pubs/FederalHumanTraffickingStrategicPlan.pdf>.

³ For a full summary of CAST's successful legislative work in California please visit <https://www.castla.org/human-trafficking/policy/>.

⁴ Summaries of legislation 2012-2019 passed in California impacting human trafficking can be found here: <https://www.castla.org/human-trafficking/policy/> Enacted California Legislation Impacting Human Trafficking Survivors 2012-2019.

Cast's experience over two decades has revealed a fragmented and inconsistent approach to combating human trafficking in California, and that 'on-the-ground' experience and practices are often not integrated into policy initiatives. We are therefore pleased to share with the Little Hoover Commission the following information on the extent of labor trafficking in California and our recommendations for effective policy changes:

California Must Focus on Sex and Labor Trafficking Equally

If there were easy legislative or policy solutions to ending human trafficking, we would have solved it by now.⁵ The only way to truly address the issue is to engage in a multi-tiered, statewide approach to increase protections for all vulnerable communities in a strategic and targeted manner.

One of the largest failures in the anti-trafficking movement is failing to give equal attention and resources to sex and labor trafficking. We fail survivors - and efforts to address human trafficking appropriately and comprehensively in our state - by primarily focusing on sex trafficking, when available data clearly shows that labor trafficking is at least equally prevalent in California.

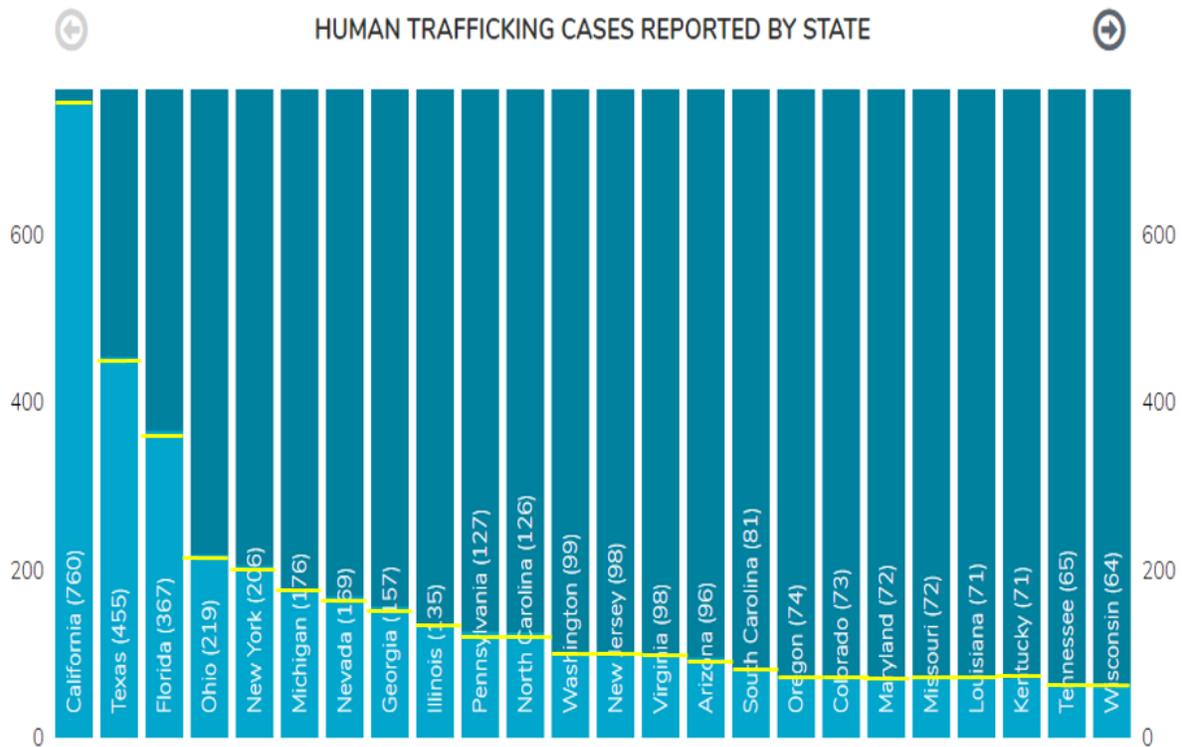
I. Extent of Trafficking in California

California's international border, numerous marine ports and airports, large runaway and homeless youth population, significant immigrant population, and large economy that attracts forced labor make it a magnet for human trafficking. Home to about 12% of the total U.S. population, our state experiences more than its "population share" of trafficking.

The National Human Trafficking Hotline (NHTH) does not capture all cases of human trafficking in the United States but it has received almost 200,000 calls from about 100,000 victims.⁶ Disturbingly, the NHTH data confirms that every year between 2007 and 2018, California led the nation in human trafficking cases by a wide margin. The following graph from the NHTH website for the first half of 2018 illustrates this.

⁵ To read CAST's full recommendations in this area please go to: How Do You Create Policy for the Anti-Trafficking Movement that Leads to Real Change? <https://www.castla.org/wp-content/themes/castla/assets/files/CASTPolicychangetips.pdf>.

⁶ "Hotline Statistics," National Human Trafficking Hotline, <https://humantraffickinghotline.org/states>.



The NHTH data is only a conservative estimate of the percentage of trafficking in the United States that occurs in California. From 2007 to 2018, NHTH found:

- **United States: 107,653 victims**
- **California: 15,738 victims**
- **California percentage: 15%**

Looking at the most recent hotline data, the percentage was 14.7% in 2017 and 16.4% in 2016. A conservative, rounded estimate for California is thus 15% of the total trafficking victims in the United States.

Of course, calls to a single hotline (and the resulting ‘cases’) represent only the tip of the iceberg - but the percentage attributable to California is reliable, increasing the likelihood that no other state has more trafficking victims or cases.

II. Trafficking in California – Recent Studies

California has never invested in a statewide prevalence study to truly understand the nature and extent of human trafficking in the state, but some of its larger cities and counties have conducted their own studies, with direct service providers such as CAST analyzing their data. The resulting information discussed below comes from urban areas such as Los Angeles, San Diego, San Jose,

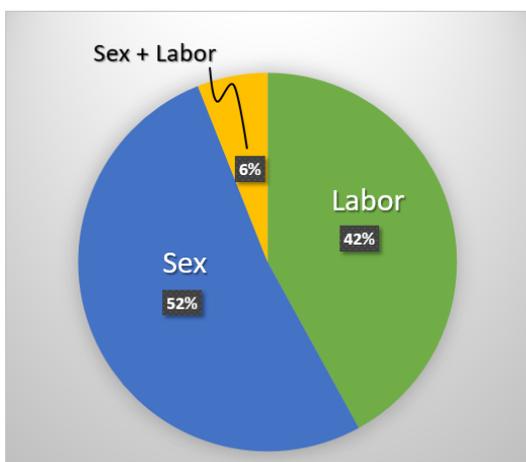
and San Francisco, and rural areas including the Central Valley. While these areas do not cover the entire state and the data is far from complete, when considered together they provide a better understanding of the nature and extent of trafficking in California.

III. Los Angeles

Because CAST may be the largest single service provider for trafficking victims in the nation, it has a substantial amount of data. Additionally, the majority of all of its client-victims were trafficked in California and for most of them CAST was able to conduct extensive interviews accurately revealing the nature and form of trafficking to which they were subject. Accordingly, CAST's data may well be the most informative for analyzing labor trafficking as a percentage of all trafficking in California.

CAST recently analyzed its data through early 2019. It conclusively shows that almost half of its clients were labor-trafficked:

CAST Data – Clients by Trafficking Category



The data from a large service provider in one California County thus shows that sex and labor trafficking occur in virtually equal proportions. CAST's data further show that hundreds of people have been victims of labor trafficking in the past several years.

Further, CAST recently worked with NERA Economic Consulting to compile a more detailed report based on a rigorous examination of over 500 confirmed cases of labor trafficked CAST clients. The high-level data analysis illuminated many notable understandings of labor trafficking, including: the wide range of demographics that are represented in labor trafficking cases, including Foreign Nationals, U.S. Citizens, males, females, transgender-identified and both adults and children; that labor traffickers are equally diverse and span a spectrum that can implicate spouses, family members and close friends, employment agencies, businesses, diplomats,

criminal organizations and some additional perpetrator types; and that labor trafficking occurs in a variety of industries in both formal and informal economies⁷

IV. Other Parts of the State

CAST has also compiled available data on sex and labor trafficking in California. As the chart below demonstrates, labor trafficking is equal to, if not more prevalent than, sex trafficking in many locations throughout our State

Table 1. Summary of Data Available on Studies of Human Trafficking in California⁸

<u>City / County</u>	<u>Sample Size</u>	<u>Labor %⁹</u>	<u>Child + Youth %¹⁰</u>
Los Angeles – CAST	1,327	48%	37.5%
Los Angeles – Covenant	72	50%	NA
Oakland – Covenant	26	60%	NA
San Francisco	452	48%	74%
Santa Clara County	185	47%	50% (<18)
Santa Clara Comm. Sol.	250	60%	39%
San Diego – labor study	38,458	NA	26% (aged 16-25)
San Diego – sex study	167	23% ¹¹	<i>(not reported)</i>
Orange County 2015	225	25%	21% (<18)
Orange County 2019	415	13%	27% (<18)
Sacramento	229	40%	35% (18-24)
Central Valley	480	25%	30% (<18)

⁷ Labor Trafficking Cases 2008-2018: Data Analysis, Philip Gnaedig, MSW, ASW, CAST (October 9, 2019). Available at: <https://www.castla.org/training-resources/resources/>.

⁸ The studies and data collections underlying this Table are discussed in CAST report LABOR TRAFFICKING IN CALIFORNIA, October 2019 Update at pages 4-17. Available at <https://www.castla.org/training-resources/resources/resources/>.

⁹ Includes trafficking identified as both sex and labor.

¹⁰ Not all studies break out the ages of victims. In general, a “child” or “minor” is considered to be a person under the age of 18, while “youth” generally means the age group of 18-24.

¹¹ From a subset of the study, which focused on sex trafficking. The figure is not representative of the actual mix of labor and sex trafficking in San Diego.

Fresno Co. EOC	1,114	38%	38%
----------------	-------	-----	-----

Based on the foregoing information, CAST provides the following recommendations to the Little Hoover Commission.

I. Sex and Labor Trafficking Must Be Addressed Together and Be Given Similar Attention

CAST believes that human trafficking - both sex and labor trafficking - should be addressed in similar ways and that the focus should be on the commercial exploitation of people for labor or services. CAST believes that focusing on one form of trafficking over another often wastes government resources and misinforms the public and government agencies on the nature of human trafficking and the many forms it takes.

Recommendations for Focusing On Sex and Labor Trafficking Equally:

- When legislators consider legislation, they must first assess if both labor and sex trafficking victims, as defined under California’s Penal Code Sec. 236.1, could be assisted by the proposed measures and enact legislation that addresses both groups.
- When training is provided by California government agencies or supported by State funding, equal information on both sex and labor trafficking should be provided.
- Prevention and outreach efforts, data collection, relevant law enforcement task forces, and specialized services programs must focus on both sex and labor trafficking to be eligible for State funding.

II. California Must Devote Significant Resources to Address This Issue, Including Investing in Good Data

In 2014, the California State Legislature took an important first step in improving access to comprehensive services for human trafficking survivors by approving a \$10 million, one-time funding request for organizations providing comprehensive direct services to trafficking victims. In 2015, the Legislature established a Human Trafficking Victim Assistance Fund, to which it allocated another \$10 million one-time award. In 2017, it approved an additional one-time funding request of \$5 million, and in 2018, another one-time funding request of \$10 million. Through each of these funding allocations, the California Office of Emergency Services (“Cal OES”) solicited funding proposals from human trafficking service providers and awarded funds to at

least 21 different providers across the state. Most recently, in June 2019, Governor Gavin Newsom signed a State budget that established **\$10 million annually** in continuing funding to human trafficking service providers.

During the first four years of the Cal OES Program, a total of 11,023 victims of human trafficking were served by the Cal OES funding allocations.¹² Together, these programs provided a total of 364,444 comprehensive services to victims of human trafficking, including, but not limited to, crisis counseling, case management, shelter services, and legal assistance. In the years to come, thousands more human trafficking survivors will be provided with essential services through the newly established, continuing 10 million allocation from California’s General Fund.

A. \$2.5 Million in Continuing Funding is Needed to Help Identify and Serve Survivors of Human Trafficking Through Training and Technical Consultation Resources¹³

While the ongoing \$10 million stable funding source for the provision of comprehensive services is a huge step forward for the State, the enactment failed to provide the full \$12.5 million originally requested. The additional \$2.5 million in continuing funding is needed for training and technical consultation resources that will help prevent trafficking in our State and enable service providers and first responders to identify and serve additional trafficking survivors, by ensuring those in the best position to prevent and early identify human trafficking survivors receive the support and training they need. This investment is needed to create a framework of training and support for agencies and first responders so that California spends its money with the highest level of impact when addressing the pervasive and insidious problem of human trafficking.

\$1.5 Million in Continuing Funding to Train First Responders

To develop curriculum and provide training on effective identification of human trafficking victims and services for this unique population, at least **\$1.5 million** must be secured annually. This funding will be used to develop and deliver statewide training to the diverse groups of front-line “responders,” including law enforcement agencies, labor inspectors, child welfare workers, school educators, health care providers, housing/homeless service providers, and public defenders, who may encounter a trafficking victim or one just escaping trafficking. **This \$1.5 million allocation would allow the state to provide three grants of \$500,000 each over a two-year period**, meaning that the state could choose to fund different types of statewide training programs for each two-year period. For example, over the first two-year period, one \$500,000

¹²Coalition to Abolish Slavery & Trafficking, Child Labor Trafficking in California Update (October 2019). Available at: <https://www.castla.org/training-resources/resources/>.

¹³ Full 2020 Budget Proposal for Training and Technical Assistance Available at: <https://www.castla.org/human-trafficking/policy/>.

grant could be used to train law enforcement agencies, another could train health care providers, and the third could train K-12 teachers statewide. Accordingly, the flexibility to fund different types of training over each two-year period would allow California to respond to practical experience in identifying the type of first responder training needed in any given year. **Continued funding for different types of responder-specific training would maximize outreach to the full panoply of human trafficking victims, both adults and children involved in either labor or sex trafficking.** As more individuals on the “front lines” are trained, more victims will be identified and connected with the services they need to escape from trafficking situations and rebuild their lives.

\$1 Million in Continuing Funding for Centralized Technical Support

To provide ongoing support to the newly funded trafficking programs and other programs identifying trafficking victims across California, an **annual \$1 million** is requested for ongoing, centralized, statewide technical consultation. This type of funding is based on domestic violence and sexual assault models of statewide technical assistance and support already available in California. It will provide victim service providers, law enforcement, and government agencies with a common resource across the state to field individual questions, coordinate law enforcement taskforces statewide, and assist those setting up new human trafficking programs or coordinating statewide services to ensure that the immediate and long-term needs of human trafficking survivors are met. **The agency receiving this funding, for example, could provide support, including but not limited to:**

- Best practice suggestions for prevention and early identification of human trafficking in California;
- Model training guidelines on victim identification that are trauma-informed and victim-centered;
- Support to comply with any legislatively enacted, statewide requirements for those organizations serving trafficking survivors and for any new agency starting anti-trafficking programs;
- Research and analysis for law enforcement agencies working with human trafficking victims on issues of privilege, confidentiality, and victim-centered protocols;
- Centralized provision of referrals for law enforcement agencies and other first responders to local programs and partners that can serve the needs of an identified trafficking victim;
- Dissemination of trafficking research study results to law enforcement, government agencies and service providers;
- Development of best practices for local taskforces in creating action plans to address trafficking; and
- Coordination of statewide train the trainer’s sessions to educate state, county, and city government agencies on the issue of all forms of human trafficking in California, training standards for employees and best practices in training models

- Statewide standards for ensuring survivors are ethically engaged in anti-trafficking work and ongoing support to prioritize survivors' work in the movement

By funding statewide technical assistance, service providers, law enforcement, and state agencies will be able to increase their capacity for focusing on prevention efforts, receiving/responding to emerging cases, identifying trafficking victims, participating as first responders, and meeting immediate and long-term survivor needs including housing, food, counseling, and legal assistance. Funding of a centralized source for technical consultation will also create increased opportunities for training and professional development to ensure that all victim services agencies funded by Cal OES are committed to trauma-informed, high-quality care for the individuals that they serve. Included in this request is an estimated cost of hiring four survivor consultants at \$60,000 annually¹⁴ to ensure that the voices of human trafficking survivors will be included in the training, outreach, and technical consultation aspects of this program. Support survivors in this way is a funding model that CAST has proven ensures programs are truly meeting the needs of its constituents, and that survivors are supported in lending their expertise to anti-trafficking programs.

B. A Working Model for Centralized Provision of Training and Technical Resources to Service Providers

California's existing statewide provision of training and technical resources to service providers addressing domestic violence prevention can serve as a prototype for its human trafficking programs. Every state across America currently has one federally recognized State Domestic Violence Coalition, which provides technical assistance and training to local domestic violence programs.¹⁵ These state Coalitions help provide supervision, direction, coordination, and administration of statewide activities related to the prevention of domestic violence. While these Coalitions do receive some federal funding, the continuity and amount of funding remains uncertain and subject to change given federal political dynamics. To provide a stable, reliable continuity of care for trafficking survivors, it is therefore imperative for states including California, where human trafficking is most prevalent, to provide funding for a state-wide human trafficking coalition

According to the U.S. Department of Health and Human Services, the primary role of each state Coalition is threefold:

- A. To provide education, support, and technical assistance to the primary-purpose domestic violence service providers and providers of direct services in the State;

¹⁴ For an illustrative example of salary alone, see Salary for Training Specialist I in California, [www.Salary.com](https://www1.salary.com/Program-Coordinator-Salary.html), <https://www1.salary.com/Program-Coordinator-Salary.html>.

¹⁵ U.S. Dept. of Health and Human Services, "State Domestic Violence Coalitions," <https://www.acf.hhs.gov/fysb/programs/family-violence-prevention-services/programs/state-dv>.

- B. To serve as an information clearinghouse, primary point of contact, and resource center on domestic violence for the State and support the development of policies, protocols, and procedures to enhance domestic violence intervention and prevention in the State; and
- C. To help programs develop and continue culturally competent practices ... including the promotion of trauma-informed services that help facilitate the social and emotional well-being of both victims and their children.¹⁶

In California, for example, the state Coalition is the California Partnership to End Domestic Violence, which receives funding from Cal OES.¹⁷ The Partnership provides a wide range of technical assistance and training services to over 100 domestic violence programs across the State.¹⁸

A similar model should be implemented to assist human trafficking service providers. **Statewide coalitions which provide technical support and training for human trafficking service providers and law enforcement have been established in a number of states**, including North Carolina (North Carolina Coalition Against Human Trafficking),¹⁹ Minnesota (Minnesota Human Trafficking Task Force),²⁰ Maine (Maine Sex Trafficking and Exploitation Network),²¹ North Dakota (FUSE--Force to End Human Trafficking and Exploitation),²² Washington (WARN--Washington Anti-Trafficking Response Network),²³ Kentucky (Kentucky Rescue and Restore Coalition),²⁴ and Colorado (Colorado Network to End Human Trafficking).²⁵ **California, which faces a higher incidence of human trafficking than each of these states, should follow suit by dedicating**

¹⁶ *Id.*

¹⁷ California Partnership to End Domestic Violence, <http://www.cpedv.org>; *see also* Annual Report 2017-2018, 14 <http://www.cpedv.org/annual-reports-financials>; Past Financials, 2017-18, 24, http://www.cpedv.org/sites/main/files/file-attachments/2018_form_990_fye_06.30.18_no_state.pdf5.

¹⁸ California Partnership to End Domestic Violence, "Professional Training and Services," <http://www.cpedv.org/professional-training-and-services>; "Domestic Violence Member Programs," <http://www.cpedv.org/domestic-violence-organizations-california>.

¹⁹ <http://www.nccasa.org/resources/human-trafficking-resources>.

²⁰ <http://mnhttf.org/>.

²¹ <http://www.mainesten.org/>.

²² <http://www.projectfuse.org/>.

²³ <http://www.warn-trafficking.org/>.

²⁴ <http://www.rescueandrestoreky.org/>.

²⁵ <http://combathumantrafficking.org/about-lcht/our-work/coneht-hotline/>.

resources to a specialized anti-trafficking program which acts as a centralized source of training and technical support for human trafficking service providers across California.

C. An Initial Investment by California of \$6 Million for Research and Evaluation of Human Trafficking is Needed

California’s investment in research funding is essential to better understand the prevalence of human trafficking throughout California and to ensure survivors are receiving the highest quality and most effective services. **California lawmakers must therefore enact a one-time Budget Request for human trafficking research in the State’s General Fund in the amount of \$6 million.**²⁶

\$3 Million for a Statewide Prevalence Study

Human trafficking is a “hidden crime.” Many victims do not self-identify or self-report, and many do not even recognize they are being trafficked. The involvement of criminal trafficking enterprises in multiple areas (sex and labor) makes it even harder to track. It is estimated that only 10% to 20% of victims ever come into contact with law enforcement or service providers.²⁷ Current victims cannot simply be “counted.” The hidden nature of this crime poses challenges to researchers, but these challenges can be addressed with sufficient investment of resources, which could then lead to cost saving measures in the future as California will know better where to invest for early identification and/or prevention of human trafficking.

Unfortunately, while many legislative efforts in California and elsewhere have focused on how best to prosecute and punish traffickers, studies aimed at understanding and reducing trafficking are often underfunded or ignored altogether. In order to address this issue aggressively, California needs a comprehensive understanding of the dynamics of human trafficking across the state — including the type of trafficking (sex, labor, or both) and who is being trafficked (adults and/or children, U.S. citizens and/or foreign nationals) and the locations where such trafficking is occurring (rural, urban, or both). Currently, there is limited research focusing on the prevalence of human trafficking in the state. Much of the data currently available is imprecise and not fully representative of the problem. Local statistics are often based on policing priorities, which can be misleading, often reflecting an agency’s focus on certain populations. California has never

²⁶ Full 2020 CA Budget Proposal for Research and Evaluation available at <https://www.castla.org/human-trafficking/policy/>.

²⁷ Carpenter, Ami, et al, “Measuring the Nature and Extent of Gang Involvement in Sex Trafficking in San Diego,” 2016, National Institute of Justice; <https://www.ncjrs.gov/pdffiles1/nij/grants/249857.pdf>. The Carpenter 2016 article cites two other articles as support for a 15–20% figure.

undertaken a research study that attempts to evaluate the prevalence of human trafficking statewide.

Robust, comprehensive data will help drive research-informed policies, assist law enforcement with proactive investigations, and help improve services for trafficking victims. Therefore, a one-time funding of \$3 million is needed to support a statewide prevalence study.

[\\$3 Million to Support Evaluation of Best Services Models for Trafficking Survivors](#)

In the anti-trafficking movement, there is currently a lack of data informing the best practices, or even a minimum standard of care, to serve the highly vulnerable, complex population of trafficking victims. One-time funding of an additional \$3 million is needed to perform a comprehensive evaluation of the service providers currently funded in California. The results of these evaluations can then be shared statewide with service providers, law enforcement, and legislators so California can take steps to ensure that the services provided to human trafficking victims are evidence-based, trauma-informed, and grounded in practical experience working with this unique population.

While there are dozens of service providers offering assistance to trafficking victims in the state, the effectiveness and quality of these services has not been rigorously studied. An evaluative study is thus crucial to ensure that California's funds are being well spent in the most targeted and strategic way possible, to provide the greatest number of victims with the highest quality of care as well as to educate professionals in this newly emerging field on recommended best practices. There is great potential for California to be a leader. The study's findings can also be used by the California legislature to develop new and innovative solutions to comprehensively serve California's trafficking survivors.

Nationwide, very few studies have been done evaluating the efficacy of services provided to trafficking victims. The most recent major study was completed in 2014 by the Research Triangle Institute ("RTI"), funded by the National Institute of Justice and entitled "Evaluation of Services for Domestic Minor Victims of Human Trafficking." This study was an evaluation of three service provider programs funded by the U.S. Department of Justice (DOJ) Office for Victims of Crime ("OVC") for domestic minor victims of trafficking. The study's goal was to document implementation in the three programs, identify promising practices for service delivery programs, and inform delivery of current and future efforts to serve trafficking victims. The study was conducted over a three-year period, focused on only three service providers, and cost \$809,246.

A comprehensive audit and evaluative study of service providers receiving California State budget grant funding would need to evaluate approximately twenty programs. Given the \$809,246

budget for RTI's evaluation of three programs, a substantially larger amount will be needed to study the 21 service providers across the state. We conservatively estimate that such a study will cost \$3 million and take three years to complete.

Future Increased Funding Must Be Supported Based on Results from California's Prevalence Study and Other Efforts

The modest funding requests highlighted above must be seen only as an important first step in meeting the funding needed to combat human trafficking in California. After a prevalence study is conducted, evaluation of best services models is complete, and sustained outreach, training, and technical assistance efforts have been funded, California should use the data it has developed to propose a comprehensive statewide plan to address human trafficking. California must then use evidence-based data to estimate the true cost of this undertaking. This type of targeted investment in California could be compared to the Freedom Funds unique approach of investing directly to combat human trafficking in defined regions called "hotspots" where trafficking is highly concentrated. California, similar in size to many countries, is a perfect comparison to this targeted approach.²⁸

CAST also offers the following additional policy recommendations to better address sex and labor trafficking in California.

I. A Public Health Approach to Combating Human Trafficking In California Is Needed

Focusing on human trafficking through a public health lens, as opposed to a criminal justice approach, will create a paradigm in California that coordinates the efforts of all relevant government agencies. State officials will increase their understanding of, and ability to address, trafficking and the unique vulnerabilities of those suffering its effects by pooling the State's agencies' existing expertise and resources.²⁹ California must delve deeply into the systemic issues that make people vulnerable to human trafficking.

Currently, California devotes many of its resources to bringing together task forces where law enforcement and community organizations work together to assist victims and bring traffickers to justice. In addition, the Attorney General's Office has often been the leader in cutting edge work addressing human trafficking. This type of response is just one of the many needed in California to reduce the prevalence of human trafficking in the State. The primary benefit of a

²⁸ Learn more about the Freedom Fund's strategic investment approach which could be a long term model for California at: <https://freedomfund.org/programs/our-approach/>.

²⁹ Human Trafficking Is a Public Health Issue: A Paradigm Expansion in the United States. 2017
Editors: Chisolm-Straker, Makini, Stoklosa, Hanni (Eds.)

public health approach is its emphasis on prevention. This will help decrease the number of individuals who experience human trafficking in the first place.

The public health framework outlined by the Department of Health and Human Services, Director of the Anti-Trafficking Office, is a good guide for this approach:³⁰

1. **A public health lens informs who intervenes and engages in the fight against human trafficking.** While there is still much for us to do to strengthen training for law enforcement, social service providers, health care providers, and other first responders, we recognize that we cannot arrest our way out of human trafficking alone. Nor can we eradicate human trafficking through victim services alone.

A public health framework expands the constituents that need to be engaged in anti-trafficking efforts. Survivors of human trafficking are critical voices to inform the development of community-based programs and government policies to prevent and end human trafficking. Identifying opportunities to enable survivors of human trafficking to meaningfully engage in participating and leading anti-trafficking efforts can contribute to more effective intervention strategies. Empowering educators and parents can improve prevention of human trafficking. Investing in research to understand the social and public health implications of human trafficking can help us to better target ways to fundamentally disrupt the dynamics that enable human trafficking to flourish.

2. **A public health lens informs how we intervene.** In addition to addressing the immediate human trafficking victimization, a public health framework recognizes the social and economic determinants of health and well-being that may lead to the crisis moment of trafficking. Interventions would go beyond the criminal justice and social service response and incorporate prevention strategies based on needs of specific populations. While human trafficking can impact anyone, some populations are more vulnerable to human trafficking due to experience of prior violence, stigma, and disconnection....

A public health approach can target anti-trafficking efforts to reduce risk in the highest risk populations instead of relying on a one-size-fits-all approach. A public health approach recognizes human trafficking along a spectrum of inter-related violence, understands the ripple effects of trauma, and encourages cultural-specific prevention and intervention efforts.

In the fight against cancer, there are certain types of treatment interventions that are universal for any type of cancer. However, not all cancers are alike and each unique form requires a level of targeted response that fits particular molecular and biological structures. We don't treat lung cancer in the exact same way as skin cancer. Similarly, there are certain types of services and prevention tactics that may be universal to any

³⁰ Full statement available at: <https://www.acf.hhs.gov/otip/resource/publichealthlens>.

form of human trafficking. However, if we can better segment out the unique driving factors and impact of specific types of trafficking markets, we can also develop more targeted anti-trafficking strategies.

3. **A public health lens informs what must be at stake to truly change the dynamics that enable human trafficking.** The existence of human trafficking is an indication that we live in an unsustainable world that has normalized and commercialized violence. Deep rooted cultural norms around power, equity, gender, and consumer behavior shape the social and economic dynamics that have enabled human trafficking. A public health framework is more likely to confront entrenched interests and highlight barriers to reducing human trafficking.

Recommendations for California to Ensure a Government- Wide Approach to Human Trafficking through a Public Health Lens

- To help bring about a government-wide approach in California using a public health lens, CAST recommends that the State adopt the federal model set forth in the TVPA of 2000. This legislation created a cabinet-level entity consisting of 15 federal government agencies that are responsible for coordinating all federal agency efforts to combat trafficking in persons.³¹ Known as the **President’s Interagency Taskforce (PITF)**, it is operated out of the Senior Policy Operating Group and has four standing committees: Victim Services, Research and Data, Grant Making, and Public Awareness and Outreach.
- California could also consider adopting an existing state model. The **Governor’s Ohio Human Trafficking Task Force**³² marshals Ohio’s resources to combat trafficking statewide. Notably, of Ohio’s 10 agency members, only one is involved in criminal law enforcement.³³
- **Topics the statewide taskforce should consider tackling include:**
 - **Identifying State agency first responders *outside of law enforcement* who are empowered to identify and assist trafficking victims.**
 - **Mapping existing California agency resources and means of collecting data statewide on human trafficking.**

³¹ Information available at: <https://www.state.gov/senior-policy-operating-group/>.

³² Learn more about Ohio’s Governor-lead taskforce at: <https://humantrafficking.ohio.gov/index.html>.

³³ The Task Force includes: Governor’s Office of Health Transformation; Ohio Department of Job and Family Services; Ohio Department of Agriculture; Ohio Department of Mental Health and Addiction Services; Ohio Department of Education; Ohio Department of Medicaid; Ohio Department of Youth Services; Ohio Department of Public Safety; Ohio Department of Health; and Ohio State Cosmetology and Barber Board.

- **Focusing its recommendations on early identification and prevention of trafficking in California.**
- **Addressing the issue of forced criminality as a consequence of human trafficking (discussed in greater detail in the following section).**

II. California Must Continue To Take Steps To Ensure Trafficking Survivors Are Not Arrested For Crimes Their Traffickers Force Them To Commit

From its 22 years of experience working with trafficking victims, CAST is well aware of the disproportionately large number of crimes for which individuals are arrested or convicted solely as a result of their trafficking status. In a survey of its membership, the National Survivor Network, a program of CAST, reported that **40% of the respondents were arrested and/ or convicted of crimes nine times or more while they were being trafficked**.³⁴ In New York, the Urban Institute documented that since 2010 the state had vacated 1,598 convictions for trafficking survivors directly related to their trafficking. Those convictions were imposed on the records of only **94 survivors**. Survivors had an average of 21 convictions on their records, the fewest had one, while one client had 147.³⁵

CAST's data from a survey of arrest and conviction records of 65 of its clients found that human trafficking victims are **arrested seven times** more frequently for activity directly related to their trafficking than for non-trafficking activity. Victims are often detained by well-intentioned officers seeking to remove them from the streets and from the control of their traffickers.³⁶ Records show that some victims had been arrested 30 or 40 times in only a few years while under the control of their traffickers. When a trafficking victim is arrested, a chain of harmful effects begins. These effects can be permanent and can occur even if no conviction ensues. As one legal scholar notes:

With [collateral effects], people are separated into groups of acceptables and unacceptables or . . . classifications of insiders and outsiders The label therefore infers that the person did not just do something wrong, but that there is something wrong with the person.³⁷

³⁴ See National Survivor Network Members Survey: Impact of Criminal Arrest and Detention on Survivors of Human Trafficking (August 2016) available at: <https://nationalsurvivornetwork.org/wp-content/uploads/2017/12/VacateSurveyFinal.pdf>.

³⁵ Consequences of Policing Prostitution: An Analysis of Individuals Arrested and Prosecuted for Commercial Sex in New York City (April 5, 2017). Available at: www.urban.org/research/publication/consequences-policing-prostitution.

³⁶ Arrest is not the Answer (2016) Available at: <http://www.castla.org/resources>.

³⁷ Shawn D. Stuckey, "Collateral Effects of Arrests in Minnesota," *University of St. Thomas Law Journal*: Vol. 5: Iss. 1, Article 14 (2008), available at <http://ir.stthomas.edu/ustlj/vol5/iss1/14>.

Shamere McKenzie, a survivor of sex trafficking and the CEO of Sun Gate Foundation, describes the struggle to overcome her arrest record, as “the invisible bars even though I am free.”³⁸

The American Bar Association has catalogued approximately 47,000 federal, state, and local collateral consequences that individuals with a criminal record face.³⁹ Even when there are no specific legal consequences, the stigma associated with an arrest can create substantial hurdles for trafficking survivors including access to employment, educational benefits, public benefits and housing, to name a few. Although with the passage of SB 1132 in 2016, California ensured children could no longer be arrested for prostitution in the State, adult sex trafficking victims continue to be arrested for solicitation, prostitution, loitering, and even for pimping and pandering or sex trafficking. Adult and child labor trafficking victims continue to be arrested for criminal acts such as drug sales and/or transportation, forced stealing, or benefits frauds, when it is the trafficker not the victim/defendant who benefits. Law enforcement, prosecutors, public defenders and courts must understand the difficult dynamics of human trafficking and the State must support updates to criminal justice laws in these areas and increase training of involved professionals from this perspective.

Currently, California’s court systems have largely focused on initiatives establishing specialized criminal courts and diversion programs for human trafficking victims. There are two major problems with this model: 1) to receive any services, a trafficking victim must first be arrested and/or 2) victims can have the threat of arrest and/or conviction held over them if they do not engage in, or complete, mandated services. For no other victim population do we use a criminal system as the access point for needed services. In her article entitled “Penal Welfare and the New Human Trafficking Intervention Courts,”⁴⁰ Kate Mogulescu provides a detailed analysis of the dangers of this approach, some aspects of which have already been adopted in California. Her cautions about the negative effects of this model should be carefully considered before California adopts any additional measures in this area.

Recommendations to Ensure that ALL Trafficking Survivors Are Not Arrested For Crimes Their Traffickers Force Them to Commit

³⁸ Personal conversation between Stephanie Richard and Shamere McKenzie on January 8, 2016.

³⁹ American Bar Association, *National Inventory of the Collateral Consequences of Conviction*, <http://www.abacollateralconsequences.org/search/>.

⁴⁰ Penal Welfare and the New Human Trafficking Intervention Courts, 68 Florida L. Rev. 1333 (2016), http://www.floridalawreview.com/wp-content/uploads/4-Gruber_Cohen_Mogulescu.pdf.

Collateral Consequences of Policing Prostitution: An Analysis of Individuals Arrested and Prosecuted for Commercial Sex in New York City (2017), https://www.urban.org/sites/default/files/publication/89451/legal_aid_final_0.pdf

- Training funded by California for law enforcement and others involved in the criminal justice system should focus on all trafficking victims who have been forced to undertake any criminal activity. Currently, training focuses only on prostitution-related crimes, but the reality is that both sex and labor trafficking victims are often forced to commit a wide range of criminal acts for their traffickers.
- Legislation should be passed requiring Law Enforcement: 1) To screen children and adults for red flags for human trafficking (a third party commercially benefiting from any criminal acts), prior to any arrest and 2) If these indicators are present, to refer these victims for services and/or to be more thoroughly screened by experts in human trafficking investigations before any arrest is made.
- The legislature must fund comprehensive, wrap around services, so Law Enforcement and other government agencies can refer trafficking victims to services without involving the criminal justice system. Any efforts to divert funding to specialized criminal courts for “human trafficking victims” and diversion programs for “human trafficking victims” should be questioned as no victim of a crime should be arrested or held hostage to a pending arrest to receive, or be forced to complete, services.
- California must invest in training its prosecutors, public defenders, and private defense counsel on the Human Trafficking Affirmative Defense created by AB 1761 (California Penal Code § 236.23) so that fewer trafficking survivors are convicted of offenses their traffickers force them to commit.
- The Judicial Council of California must fully implement SB 823 (California Penal Code § 236.14) to ensure arrests and convictions for trafficking survivors are vacated in a trauma-informed manner sensitive to the crime victim’s needs. Full implementation of Penal Code § 236.14 must include investing State resources to support a process in California to consolidate arrests and convictions in one jurisdiction for trafficking survivors with incidents in multiple jurisdictions, as is currently allowed by California Penal Code 236.14(f). Courts have failed to adopt measures to allow victims access to this streamlined relief. The Judicial Council should make specific recommendations for clarifying statutory language needed to fully implement Penal Code § 236.14 and the Legislature should enact these measures.

III. California Must Focus on the Issue of Child Sex and Labor Trafficking Equally in Its Child Welfare System

California Has Fallen Far Behind Other States in Identifying and Serving Its Child Labor Trafficking Population.⁴¹ In 2014, the California Legislature passed Assembly Bill 2035 (Chesbro,

⁴¹ For a full report on the unequal treatment of child labor trafficking victims in California see Coalition to Abolish Slavery & Trafficking: CHILD LABOR TRAFFICKING IN CALIFORNIA Update, October 2019 available at: <https://www.castla.org/training-resources/resources/>.

See also Stephanie Richard Esq. et al., Child Labor Trafficking is a Child Welfare Issue (2015) available at: <https://www.castla.org/training-resources/resources/>.

“Sexually Exploited and Trafficked Minors”). It was a bipartisan bill that addressed the trafficking of all minors in California. Among other things, the Bill added a provision to existing law providing that “a minor is within the jurisdiction of juvenile court and a dependent child of the court if the minor is a victim of human trafficking.” Because the phrase “human trafficking” covered both labor trafficking and sex trafficking, AB 2035 recognized that *all* child trafficking victims need the specialized services and support of the child welfare system.

Despite being passed nearly unanimously by both the Assembly and the Senate, in September 2014 the Governor vetoed the bill, stating:

*“I am returning Assembly Bill 2035 without my signature. Efforts have just gotten underway with the passage of this year’s budget to combat the commercial sexual exploitation of children, who are also victims of human trafficking. * * * This bill, however, is premature. More investigation and discussion needs to take place before local authorities are in a solid position to curb the tragedy of young people who are forced to work under illegal and unacceptable conditions. I am directing the Department of Social Services (DSS) to assemble relevant parties to explore all avenues that can be pursued to alleviate this suffering.”* (Italics added.)

In the same year, the Governor signed a budget bill that codified that all forms of commercial sexual exploitation met the definition of child abuse. This left a significant difference between the way child sex trafficking and child labor trafficking are treated in California’s child welfare system.

As the Governor’s Veto Message confirms: child labor trafficking occurs in California, it is a “tragedy,” and the State needs to act decisively to “alleviate this suffering.” Unfortunately, the legacy of the AB 2035 veto is that California has failed to take decisive action against child labor trafficking. Sufficient time has passed since the Governor’s veto for the “investigation and discussion” by DSS requested by the Governor to be implemented. In the interim, at least thirteen other states have updated their definitions of child abuse to include child labor trafficking and are actively looking at how all forms of child trafficking are dealt with in their respective child welfare systems. California lags behind its peers despite its express acknowledgement of the problem. It is no longer “premature” for California to address the plight of these children. We must now act decisively.

[Recommendations to Ensure that ALL Trafficked Children Receive the Protection and Support They Need in California](#)

- The California Legislature needs to update statutory language enacted in SB 885 (2014) to ensure California’s definition of child abuse covers both sex and labor trafficking. The language must also be updated so that the state’s existing plan - that focuses only on

commercial sexual exploited children (CSEC) - is expanded to ensure that child labor trafficking victims are similarly protected by our child welfare systems.⁴²

- The California Legislature needs to update the statutory language created in SB 795 (2015) to include early identification and services for at-risk child labor trafficking victims in the child welfare system in the same way CSEC victims and those at-risk for CSEC are protected.⁴³
- All future legislation must protect both sex and labor trafficked children, and legislation previously passed that focuses only on CSEC must be updated to include both. For example, this year the legislature passed AB865 (Resource families: training) which trains foster families only on CSEC and not on child labor trafficking.⁴⁴ By contrast, in 2018, California enacted legislation requiring education in schools on both sex and labor trafficking.⁴⁵
- The California Legislature needs to fund specialized programs for both child sex and labor trafficking victims in the child welfare system.
- The Department of Social Services (DSS) must collect and report data on child labor trafficking, not just on CSEC.
- DSS must add child labor trafficking to any State funded training on CSEC and must provide equal training on all forms of trafficking.⁴⁶
- California must add child labor trafficking to the issues addressed by the State CSEC Action

⁴² SB 855: Human Services (2014), codified at CA Welfare and Institutions Code Chapter 5.2, § 16524.6, created the Commercially Sexually Exploited Children Program. This language needs to be updated to protect labor trafficked children.

⁴³ SB 794 (2015) requires county child welfare agencies and probation departments to implement policies, identify, document, and determine appropriate services for children and youth who are receiving child welfare services and are, or are at risk of becoming, victims of commercial sexual exploitation. This language needs to be updated to protect labor trafficked children.

⁴⁴ AB 865 as originally introduced included education for foster families on both sex and labor trafficked children and passed unanimously in the Assembly. This comprehensive approach was removed by the Senate and AB 865 as passed includes only training on CSEC. See Concurrence in Senate, Assembly Bill Analysis, indicating that the Senate “Deleted language that includes labor trafficking as a topic on which certain individuals must receive information and training...” Available at:

[file:///C:/Users/Stephanie/Downloads/201920200AB865_Assembly%20Floor%20Analysis_%20\(1\).pdf](file:///C:/Users/Stephanie/Downloads/201920200AB865_Assembly%20Floor%20Analysis_%20(1).pdf)

⁴⁵ See SB 1104 (2018) (Roth) Human Trafficking Prevention Education and Training Act and AB 1227 (2018)(Bonta) Human Trafficking Prevention and Education Training Act. In 2014 when this bill was first passed it covered CSEC only. See SB 1165 (2014) (Mitchell) Pupil safety: human trafficking prevention resources.

⁴⁶ See CDSS webpage reporting: The CDSS Child Trafficking Response Unit (CTRU) began in November 2014. CTRU administers the SB 855 created (Senate Committee on Budget and Fiscal Review, Chapter 29, Statutes of 2014) Commercially Sexually Exploited Children (CSEC) Program and provides support to child welfare and probation agencies in all 58 counties in California to meet federal and state requirements to screen and assess the needs of children at-risk or victims of CSEC. In partnership with CDSS, California Social Work Education Center (CaISWEC), and the Public Child Welfare Training Academy (PCWTA), developed the CSEC Awareness training module (colloquially called “CSEC 101”). <https://www.cdss.ca.gov/inforesources/Child-Welfare-Protection/Child-Trafficking-Response>.

Team and Counties implementing CSEC teams, supported by the Child Welfare Council created under Welf. & Inst. Code § 16540.

IV. **California Should Strengthen Regulations and Enforcement Against Businesses to Better Prevent Labor Trafficking**

California's economy is larger than that of all but four countries. California is thus well positioned to enact cutting edge legislation to prevent trafficking in California, and around the world, by better regulating the business community. California can do this by enacting legislation that focuses on ending common exploitive work practices. It can focus on protecting vulnerable immigrant communities, burdened by our current immigration system's inadequacies, to reduce the chances of exploitation and trafficking. Finally, it can look at its own spending practices to better protect workers in California and globally.

Recommendations to Ensure that Businesses Prevent Human Trafficking in California Instead of Facilitating It

- **Supply Chain Transparency Updated to Include Mandatory Human Rights Due Diligence (MHRDD) to Prevent Human Trafficking:** Passed in 2010, SB 657 (the Transparency in Supply Chains Act) made California a leader in eradicating slave labor from supply chains. As a result of the legislation, consumers gained new information about companies' efforts to combat trafficking in their supply chains and California created a framework globally that fostered greater conversation around human trafficking amongst businesses, investors, CSOs, trade unions, and the general public. Although SB 657 has had a tremendous initial impact over the last 10 years, creating a framework for laws passed in the United Kingdom, Australia, and the Netherlands, the movement now understands that the absence of legal standards defining companies' duties and ensuring access to justice for victims of corporate malpractice has produced serious gaps in accountability. The California legislature must reexamine the situation and pass legislation updating its approach to preventing human trafficking by adopting a framework of Mandatory Human Rights Due Diligence. MHRDD includes not only business transparency and reporting requirements but also risk identification and the obligation to take action and to report on measures taken, including their outcomes.⁴⁷
- **Ending Fraudulent Labor Recruitment to Prevent Human Trafficking:** The practices of

⁴⁷ Full information on recommendations in this area can be found in ECJJ Position Paper (June 2018) KEY FEATURES OF MANDATORY HUMAN RIGHTS DUE DILIGENCE LEGISLATION available at: http://corporatejustice.org/eccj-position-paper-mhrdd-final_june2018_3.pdf. A detailed analysis of updating business transparency reporting requirements on human trafficking has been published by the International Corporate Accountability Roundtable (March 2019) Full Disclosure: Towards Better Modern Slavery Reporting (Summarizing current issues with CA law and suggested next steps to update this framework) available at: https://static1.squarespace.com/static/583f3fca725e25fcd45aa446/t/5c9aee46085229887ba8f773/1553657415304/ICAR+Full+Disclosure+Report_Final.pdf. Additional resources summarized at: <https://www.icar.ngo/what-does-effective-diligence-looks-like>.

unscrupulous foreign labor recruiters are one of the most well-documented paths into labor trafficking. Luring economically vulnerable people from around the world with false promises of steady work and fair pay, these agents use recruitment fees and uncertain immigration status to prey upon victims who have little power in their home countries and even less in the U.S. In 2014, California passed first-of-its-kind legislation requiring foreign labor contractors to adopt a “zero fees” policy for workers and to register with the California Labor Commission. Although the bill was designed to cover the 150,000 temporary workers that come to California annually (one-fifth of the temporary workers in the country), due to a drafting error it has been interpreted to cover only 3,000 workers, making the bill’s protections all but nonexistent and impossible to implement. The California Legislature must pass a technical fix to this bill, ensuring its effective implementation in California so that it can serve as a model for the United States as was originally designed. Additionally, California should increase enforcement mechanisms against businesses by adding joint and several liability obligations for employers, language that was included in the original legislation, but removed as a compromise with business during the legislative process.

- **Ensuring Criminal Liability for Bad Business Actors to Prevent Human Trafficking:** California’s criminal law should be updated to conform with federal law enacted in 2008 that criminalizes “knowing” and “reckless disregard” for human trafficking.⁴⁸ Successful litigation under this law demonstrates the need for this provision in the world’s fifth largest economy. In *Ricchio v. McLean*, 853 F.3d 553, 557 (1st Cir. 2017), for example, the victim adequately stated a claim against a motel owner’s and operators’ association for the actions of a hotel guest who held the victim against her will. The association was deemed a culpable venture under the statute as the owner and operators knowingly benefited from renting the space in which the hotel guest obtained the forced labor services.
- **Slavery-Free Procurement for California to Prevent Human Trafficking:** During President Obama’s terms of office, there was a major push at the federal level to put into place strong protections preventing any products tainted by trafficked labor from being purchased through the federal procurement processes. Legislation adopting this standard for California Procurement would greatly increase the impact of the federal government efforts, as California spends nearly \$10 billion in state procurement annually. Enacting such a procurements policy would have a massive impact both in terms of specific purchases, but also in terms of applying pressure to companies seeking to maintain their business with the State.

Conclusion

Thank you for considering CAST’s suggestions for a comprehensive, all state-agency approach to combating sex and labor trafficking in California. CAST, and particularly the trafficking survivors we serve, greatly appreciate the Little Hoover Commission’s efforts to report on the importance

⁴⁸ See 18 USC §1593A.

of addressing labor trafficking in California. We hope that its work will help the State begin to take the steps needed to improve its approach to sex and labor trafficking and continue California's leadership in this area. If you have any further questions, please contact Stephanie Richard, Senior Policy Advisor at stephanie@castla.org or 213-365-1906 x 115.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Buck". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Kay Buck, CEO, CAST