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**House Judiciary Committee**

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**Hearing: Oversight of Federal Efforts to Combat Human Trafficking**

Chairman Nadler, Vice Chair Dean, Ranking Member Jordan, and Members of the Judiciary Committee, it's an honor to have been asked to present this written statement.

We provide this statement jointly to provide a snapshot into the intersection of children and youth impacted by sex trafficking, also known as commercial sexual exploitation (CSE), and the juvenile justice system. We will begin with an overview of the legal landscape and data underscoring this intersection, highlight the work that Los Angeles County's Probation Department has spearheaded to address CSE in partnership with the National Center for Youth Law, and end with brief recommendations on how to support young people and their families.

## **Background**

Los Angeles County is considered a significant hub for the sex trafficking of youth. In an effort to address trafficking and support youth, the Los Angeles County Probation Department (Probation) developed the Child Trafficking Unit (CTU), which I, Michelle Guymon, direct. We began the CTU in January 2012 as a collaborative effort between Probation and the Courts to address the unique needs of this population. Today, we are leading the nation in thinking differently about how we respond to the sex trafficking of children and youth. We've long known that sexual exploitation and sexual abuse are prevalent amongst those that are involved in the juvenile justice system.<sup>1</sup> The CTU takes a highly relational approach to address the underlying trauma and abuse that youth have experienced both prior to, and during their exploitation. Through this approach, the CTU aims to support more positive outcomes and futures for youth who have experienced commercial sexual exploitation.

The National Center for Youth Law (NCYL) has been advocating for and with youth for more than 50 years to transform our nation's approach to education, health, immigration, foster care, and youth justice through policy advocacy, collaboration, research, and impact litigation. The Collaborative Responses to Commercial Sexual Exploitation Initiative at NCYL seeks to eliminate the commercial sexual exploitation of children and youth by developing collaborative, youth-centered responses to support youth and families who have been affected by CSE to be safe, to heal, and to achieve their goals. I, Kate Walker Brown, have been leading the NCYL team partnering with LA County Probation and the County more broadly for a decade.

## **Legal Landscape**

Until recently, it was common to arrest children who were being exploited for prostitution and process them through the juvenile justice system. Unfortunately, it was the primary way child victims of trafficking were able to access services. In response to a greater understanding of the dynamics of commercial sexual exploitation and to avoid criminalization of youth for their exploitation, we've seen many states shift away from this approach in the last decade. In 2014, California passed Senate Bill 855 (SB 855), which clarified that CSE is child abuse and created a state-funded program for serving children identified or at risk of CSE within the child welfare system. In 2016, California passed Senate Bill 1322 (SB 1322), which rendered the crimes of prostitution and loitering with the intent to commit prostitution inapplicable to minors – affirming there is no such thing as a “child prostitute.”<sup>2</sup> At least 29 states and D.C. have passed similar legislation – termed safe harbor laws – up from only 5 in 2011.<sup>3</sup>

In 2000, the Trafficking Victims Protection Act (TVPA) became the first comprehensive piece of federal anti-trafficking legislation in the United States, clarifying that any child engaging in a commercial sex act is a victim of trafficking without any requirement of evidence of force, fraud or coercion. In 2014, the Preventing Sex Trafficking and Strengthening Families Act (PSTSFA), and state laws implementing it since, required states to identify, document, and provide services to young people at risk of or experiencing CSE. In light of the heightened risk of trafficking that

youth in foster care face,<sup>4</sup> these laws focused on youth who are under the jurisdiction of the child welfare system, and those housed in foster care placements while under jurisdiction of the juvenile justice system. They do not require the same protections, supports, and resources for young people within the juvenile justice system - resulting in inequities. The federal laws also do not go so far as to prohibit the criminalization of youth, despite acknowledging that these children are victims of human trafficking and child abuse.

### **Youth Impacted by CSE in the Juvenile Justice System - What We Know**

After the passage of safe harbor laws in states throughout the country, we believed that probation departments would no longer have a significant role to play in addressing the needs of youth experiencing CSE. However, despite the change in laws, LA County Probation (and likely other probation departments across the country) has continued to see substantial numbers of youth who are identified as experiencing CSE.

#### *Reasons for Juvenile Justice System Involvement*

Youth impacted by CSE continue to become entangled in the juvenile justice system despite the decriminalization of prostitution-related offenses for a variety of reasons. It is well-documented that youth within the juvenile justice system, especially girls, often have long histories of physical and sexual abuse and trauma that go back to early childhood.<sup>5</sup> These young people are often mislabeled as “problem children,” “troubled,” or “hard to place.” Their behaviors, including exploitation, are often not recognized as the manifestations of trauma they are.

Youth impacted by CSE come to Probation’s attention for reasons related and unrelated to their exploitation. Some youth become Probation-involved for the behavioral reactions to their trauma, such as fighting with a family member, staff member at a group home, or on a school campus, and false ID to a police officer, among others. Other youth are arrested for things done in connection to their exploitation, at the direction of their exploiters, or as a means of survival. These include charges as small as petty theft for stealing clothing or food to survive while experiencing housing instability, and as serious as murder for driving a car while an exploiter pulled the trigger or defending their life against a violent buyer or exploiter, like Sara Krusan.<sup>6</sup> Youth are also picked up on charges unrelated to exploitation, like drug charges.

As arresting children for prostitution was phased out, many probation departments and their multidisciplinary partners (like child welfare and law enforcement) have struggled with how to keep kids safe from the dangerous circumstances of their exploitation, as well as other high-risk behaviors, without locking them up. Having sufficient alternatives to detention and options for meeting youth’s needs while on probation and beyond, including safe and stable housing, is a challenge we have continued to face, and one which LA County is tackling head on.

#### *Youth Impacted by CSE in the Juvenile Justice System in Los Angeles*

As part of its commitment to addressing this issue, LA County has invested in research and data collection to deepen our understanding of challenges and needs. A 2018 research study conducted by California State University, Los Angeles and the National Center for Youth Law showed that youth in LA County who have been identified as CSE have significantly more contact with the juvenile justice system than their non-CSE counterparts. This includes more arrest referrals, petitions filed, petitions sustained, bench warrants, and entrances to secure facilities.<sup>7</sup>

And despite a huge reduction in the overall number of young people being detained across the County, a recent look into the remaining 32 girls in LA’s juvenile halls in February 2022 reveals that 56% of them have previously been identified as CSE. A large percentage of these youth are

in juvenile hall on warrants, meaning that they were picked up for a probation violation or status offense—like running away—rather than a new charge. All but one of the youth had a prior history of child welfare system involvement, and half had current child welfare cases.

A 2020 follow-up research study similarly shows that most youth impacted by CSE who are on Probation have also had child welfare system contact. The study found that nearly all of the youth within the Probation sample had child welfare system histories (98% of the 222 CSE-identified youth, 94% of the 237 non-CSE comparison group).<sup>8</sup> However, two-thirds (69%) of youth who had been identified as CSE by Probation had not been identified as having experienced CSE by the child welfare system, meaning that they were primarily identified through Probation only.

Early on, recognizing that we were continuing to encounter young people impacted by CSE in probation, LA County began to actively train County staff on CSE and created several protocols to help identify and address the needs of these youth.<sup>9</sup>

These efforts led to a large spike in identification of young people impacted by CSE within Probation's care. Since LA first began tracking this data in 2012, over 1,900 youth who have experienced CSE had been identified by Probation in Los Angeles.<sup>10</sup> Between August 2014 and August 2021, 713 children were identified through LA County's nationally-recognized Law Enforcement First Responder Protocol, which provides an alternative, service-based model to arrest and detention.<sup>11</sup> Between 2013-2021, over 917 children within the County's three juvenile halls disclosed that they had been, or were being, exploited, or agency staff reasonably suspected that the youth was being exploited leading to development of a second collaborative protocol, the Detention Interagency Identification and Response Protocol.<sup>12</sup> Each year, the Probation Child Trafficking Unit serves approximately 115 youth, using our trauma-informed, relationship and service-based model to supporting youth on probation.

Without these proactive efforts from Probation, many of these young people would have gone unidentified as victims of trafficking and may not have accessed supportive services. We do not have a similar picture of the data across the state, or the country, as most jurisdictions do not actively track this population within their juvenile justice systems, primarily because it is not required.

#### *Racial/ethnic disproportionality in system involvement and trafficking victimization*

Across the nation, youth of color, particularly Black and Native youth are disproportionately impacted by CSE.<sup>13</sup> Many of the same things that lead to increased exploitation of youth of color - racism, sexism, settler colonialism, misogyny, over-sexualization and adultification - also contribute to overrepresentation in the child welfare and juvenile systems; these two experiences compound each other. In LA, this disproportionality is stark – Black children account for only 7.5% of LA's child population, yet they represent approximately one third of the youth in the child welfare system and juvenile justice systems, and approximately two thirds of the youth identified as CSE in LA County by both Probation and child welfare.<sup>14</sup> Latinx youth, who make up the majority of children in LA County, are underrepresented in who we are identifying as CSE. Understanding these trends is critical to how we respond to CSE in LA County and across the country - including how our units are staffed, representation in our training and outreach materials, and ensuring access to culturally supportive services for youth and families.

### Transition Age Youth

Transitioning between childhood and adulthood can be an especially difficult time for any youth. And youth who have experienced CSE and also been involved in the juvenile justice system often experience even more profound challenges.

- Within LA County, the average age of youth identified through the First Responder Protocol is 15.8 years old.
- For youth identified through the FRP while under 18 between 2014-2018, nearly 1 in 5 went on to be arrested for a prostitution-related offense after turning 18. Looking at the data two years later, this number jumped to 1 in 3 youth.
- 31% of youth served by the specialized CSE delinquency court, the STAR Court, had been pregnant.<sup>15</sup>

This data suggests that failure to provide services and guidance to support a youth through this unique transition period may result in further vulnerability to or reliance on exploitative relationships or situations, and new involvement in the adult, criminal legal system. We know that many youth continue to be exploited after turning 18, and they are likely to be criminalized for it. However, they do not become willing participants overnight, nor do the trauma, harm, and experiences that led to and resulted from exploitation automatically disappear on their 18th birthdays. Services and supports they rely on often do, as do many of the non-punitive, victim-centered responses.

A history of CSE combined with past or current legal system involvement creates lasting barriers to education, employment, housing, parenting, and other areas which hinder a person's ability to heal and achieve their goals. Specifically, many survivors don't qualify for certain apartments, are foreclosed from jobs because of their criminal records, and never graduate because of school disruptions. Even those who are able to leave exploitation are often on the brink of returning - one missed paycheck or unexpected medical bill. This is especially true for young parents who are trying to get by, do right by their children, and avoid cycles of intergenerational trauma. Exploitation can seem like the only option available to survive. But, with adequate support and opportunities, transition age youth can and do thrive.

To address this, LA County Probation created a new position within the CTU to specifically support the TAY population, who works closely with youth as they approach their 18th birthday and works with youth to apply for and access Independent Living Program (ILP) and Extended Foster Care (EFC) programs. Many CTU probation officers also maintain close relationships with young people after their probation terms end, underscoring the deep and trusting bonds they are able to create with the youth they serve. In addition, LA County recently launched a new Human Trafficking Diversion Court.<sup>16</sup>

### Focus on the Child Welfare System May Have Unintended Consequences

As noted, both federal and state laws put affirmative obligations on states to identify, document, and provide services to youth experiencing or at risk of CSE who are in the child welfare system, as well as have protocols in place to locate missing children. In response, many states, including California, also built out service systems for youth impacted by CSE through the child welfare system. We must ensure that the benefits of these new approaches are not limited to youth within child welfare for several reasons:

- *Child welfare/juvenile justice system overlap:* Many youth within the juvenile justice system have similar risk factors for exploitation as those within the child welfare system, or have been in each system at different points in their lives. If we only focus on the child welfare system, we will miss children who could otherwise be identified and benefit from

supportive, specialized services. When youth are involved in both systems, there must be collaboration to meet their needs in a coordinated way.

- *Youth at home*: Of the 713 youth identified through LA's First Responder Protocol, 70% of them were living at home with a parent or relative. These numbers indicate that we are missing opportunities to identify and serve the many children who are living at home or in their communities while experiencing or at risk of CSE. This leads to underinvesting in supports for families, caregivers and communities to help address young people's needs without deepening system involvement.
- *Across-the-board training*: We are not routinely training those beyond child welfare who interact with young people - probation, health services, mental health, law enforcement, schools, and community members. Everyone must be equipped, and feel responsible for stepping up to locate, identify and support young people impacted by CSE.
- *Messaging*: When we only view those youth within child welfare as potential victims of exploitation, we unknowingly reiterate the message that juvenile justice involved children are problem children and to be blamed for what has happened to them. We must shift our policies and practices to be inclusive of all youth, regardless of whether they are system-involved, and where they lay their heads at night. Moreover, if our perceptions of these young people do not shift, certain communities will continue to be disproportionately impacted and underserved, specifically Black girls, LGBTQIA2S+ youth, and Native youth.

### **Transforming our Approach**

Los Angeles County has taken an all-hands-on-deck approach to tackling CSE and supporting young people. Our approach is collaborative, recognizing that no one agency or organization can support the needs and strengths of youth impacted by CSE and their families. It is highly relational – focused on developing deep and long-term relationships that see and value the youth as a whole person, avoiding a focus exclusively on their exploitation or other behaviors. We stick with the youth and the family for the long-term, recognizing that leaving exploitative situations is non-linear and requires a harm reduction approach to meet the youth where they are.

With leadership from the Probation Department and technical assistance from the National Center for Youth Law, LA County has:<sup>17</sup>

- Made deep investments to develop and resource specialized child trafficking units within probation and child welfare, along with specialized, collaborative courts and weekly multidisciplinary teaming, all of which have become national models. These services prioritize lower caseloads, relationship building, engagement and empowerment with young people, and trauma-informed care
- Created three victim-centered, youth-centered, trauma-informed collaborative protocols:
  - Law Enforcement First Responder Protocol, which triggers a 90-minute, service-based alternative to arrest and detention whenever a young person is identified as CSE by law enforcement, which includes an expedited response from the child protection hotline, crisis response from a community-based CSE advocate, and emergency medical and mental health care
  - Detention Interagency Identification and Response Protocol, that seeks to proactively identify young people who have or are experiencing CSE and provide support to them while in Probation detention facilities, including medical and mental health care, and develop a transition plan that connects them to community-based supports to smooth the transition from detention
  - Victim Witness Testimony Protocol, which creates a support team for any youth called to testify as a witness in criminal proceedings against their exploiter to

avoid harm and re-traumatization while supporting effective prosecution of trafficking cases

- Required widespread training of all County employees on CSE, with more than 77,000 County employees having completed an online awareness-building module, and nearly 45,000 County employees, service providers, caregivers and families receiving live trainings
- Prioritized survivor leadership, mentorship, and monthly empowerment activities for young people
- Invested heavily in community-based advocacy services to provide survivor mentorship, 24/7 crisis support, case management, parent and family support programs, and other critical services
- Created a new position in the CTU to specifically support the TAY population

In addition to the collaboration with Los Angeles outlined above, the National Center for Youth Law has been a leader in California and more broadly to grow awareness, change laws to be more victim-centered, develop innovative policies and practices, and center the voices of youth, survivors, and lived experience experts. Our work includes:

- Establishing a statewide collaborative, CSEC Action Team,<sup>18</sup> of key stakeholders to share promising practices, lift up challenges, and design policies
- Spearheading first-of-its-kind research to expand the knowledge base and understand what works for youth impacted by CSE
- Developing an advocacy Toolkit<sup>19</sup> for jurisdictions across the county to better identify and serve youth impacted by exploitation
- Initiating the creation of and staffing an Advisory Board<sup>20</sup> of survivors/lived experience experts to inform state and local practices for youth impacted by CSE
- Passing laws to recognize the impact of trauma and to remove barriers for survivors of human trafficking<sup>21</sup>
- Drafting the seminal report<sup>22</sup> in California that called for a multidisciplinary approach to serving young people impacted by exploitation
- Providing technical assistance to other counties in California

### **Recommendations & Lessons Learned**

The data and information above illuminates the ongoing role that the juvenile justice system continues to play with young people impacted by CSE. This is both an opportunity and a challenge. We must simultaneously recognize two realities: First, that many identified victims of CSE are, in fact, still involved in the juvenile justice system and must be identified and met with compassionate, trauma-informed care using approaches like those LA County has pioneered. And second, that we must work toward a world where no one is criminalized for trauma and abuse they have experienced. As the Committee explores solutions, we urge you to incorporate the promising and innovative approaches created by Los Angeles County Probation and its partners and consider the following recommendations:

- 1. Commit to ending the criminalization of victims of trafficking, including detention for youth's own protection**
  - a. Expand safe harbor laws to all 50 states to affirm there is no such thing as a "child prostitute"
  - b. Increase identification and documenting of youth impacted by CSE in the juvenile justice system, with clear processes for referral to services
  - c. Prohibit and create alternatives to using detention for a youth's own protection, or due to lack of safe, stable housing options

- d. Avoid unnecessary detention of young people by making status offenses (e.g. running away) and no bail warrants discretionary
  - e. Require courts and other juvenile justice system partners to consider trafficking and other underlying trauma and expand options for diversion, referral to specialized collaborative courts or units, affirmative defenses, sentencing relief, and vacatur/recording clearing<sup>23</sup>
- 2. Prioritize and fund community-based alternatives and services**
- a. Expand use of community-based, multidisciplinary collaborations that provide service-based alternatives to arrest, detention, and extended probation supervision without requirement of ongoing system involvement
  - b. Create and fund community-based CSE-specific advocacy organizations, especially those with peer and survivor/lived experience expert staff members
  - c. Expand supports to families and caregivers, such as trafficking prevention programs, economic supports, parent partner/peer mentor programs, and non-western healing methods and culturally relevant services, especially to support Native youth and their families and caregivers
  - d. Remove funding restrictions so young people can stay connected to helpful services even when they move to different placements or their case closes in probation or child welfare
  - e. Create and fund family-based housing supports for youth impacted by CSE that do not involve system involvement
- 3. Shift messaging to make clear that trafficking impacts all youth, including those within the child welfare and juvenile justice systems, and those living at home.**
- a. Require and fund broad training and public awareness building to promote a “no wrong door” approach and ensure that individuals working with young people across the spectrum (probation, teachers, health care professionals, mental health professionals, coaches, etc.) recognize the signs of trafficking and have clear direction on a service response
  - b. Recognize that kids beyond the child welfare system, including those that are currently under the supervision of the juvenile justice system and those living in their communities, may be impacted by CSE, and policies to identify, support, and expeditiously locate should be applied to all young people
- 4. Provide ongoing services and supports to transition age youth (TAY) impacted by exploitation, regardless of system involvement**
- a. Ensure services and resources are available to TAY beyond age 18, whether they are child welfare or juvenile justice system involved or neither
  - b. Create and fund specialized advocacy and mentorship, transitional housing options, child care and parenting support, assistance with obtaining sustainable employment, and record clearing
  - c. Provide ongoing funding for informal relationships even beyond formal client-provider relationship to connect individuals to long-term supportive relationships and services
- 5. Prioritize youth and survivor leadership in developing solutions**
- a. Build off of existing models for centering youth and survivor leadership in program development, research and evaluation, and policy change, such as



Advisory Boards<sup>24</sup> and youth councils<sup>25</sup> and hiring practices that prioritize lived experience and ensure they are meaningfully compensated

- b. Require mechanisms to promote youth's input in decision making about services, supports, housing, and goal setting in the child welfare and juvenile justice systems
  - c. Remove barriers to education and employment for survivors who are often saddled with criminal records<sup>26</sup>
  - d. Hire survivors to provide direct service to young people
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## Endnotes

- <sup>1</sup> Rebecca Epstein, Lindsay Rosenthal, Malika Saada Saar, & Yasmin Vafa, Georgetown Law Center on Poverty and Inequality, Ms. Foundation for Women, & Rights4Girls, *The Sexual Abuse to Prison Pipeline: The Girls' Story* (2015), available at <https://www.law.georgetown.edu/poverty-inequality-center/wp-content/uploads/sites/14/2019/02/The-Sexual-Abuse-To-Prison-Pipeline-The-Girls%E2%80%99-Story.pdf>.
- <sup>2</sup> Rights4Girls, *No Such Thing Campaign*, [WWW.RIGHTS4GIRLS](http://WWW.RIGHTS4GIRLS), <https://rights4girls.org/campaign/> (last visited April 18, 2022).
- <sup>3</sup> Shared Hope International, *Shared Hope International Releases Ninth Annual Sex Trafficking 'Protected Innocence Challenge' State Report Cards*, [WWW.SHAREDHOPE.ORG](http://WWW.SHAREDHOPE.ORG), <https://sharedhope.org/2019/11/20/shared-hope-international-releases-ninth-annual-sex-trafficking-protected-innocence-challenge-state-report-cards/> (last visited April 18, 2022).
- <sup>4</sup> See Preventing Sex Trafficking and Strengthening Families Act, PL 113-183, September 29, 2014; see also Trafficking Victims Protection Act of 2000, 22 U.S.C.A. § 7101-7114; Cal. Welf. & Inst. Code § 16524.8(a) (as amended in 2017 by AB 1227); Cal. Welf. & Inst. Code § 16501.35; see generally Shared Hope International, *Report Cards on Child & Youth Sex Trafficking*, [WWW.SHAREDHOPE.ORG](http://WWW.SHAREDHOPE.ORG), <https://sharedhope.org/what-we-do/bring-justice/reportcards/protected-innocence-challenge-issue-briefs/> (last visited April 18, 2022).
- <sup>5</sup> Epstein et al., *supra* note 1.
- <sup>6</sup> ByRhonda Lyons, *Victims Behind Bars: Trafficking Survivors Still Struggle Despite State Laws*, CalMatters, Jan. 27, 2021 (edited Mar. 14, 2022), <https://calmatters.org/justice/2021/01/sex-trafficking-victims-prison-california/>.
- <sup>7</sup> Carly B. Dierkhising, Kate Walker Brown, Mae Ackerman-Brimberg, Allison Newcombe, National Center for Youth Law, & California State University, Los Angeles, *Commercially Sexually Exploited Girls and Young Women Involved in Child Welfare and Juvenile Justice in Los Angeles County: An Exploration and Evaluation of Placement Experiences and Services Received* (2018), available at [https://youthlaw.org/sites/default/files/attachments/2022-02/CSEC-Research-Report\\_Placement-Exp-Svcs-Recd\\_NCYL\\_Cal-State.pdf](https://youthlaw.org/sites/default/files/attachments/2022-02/CSEC-Research-Report_Placement-Exp-Svcs-Recd_NCYL_Cal-State.pdf).
- <sup>8</sup> Carly B. Dierkhising, Mae Ackerman-Brimberg, California State University, Los Angeles & National Center for Youth Law, *CSE Research to Action Brief Translating Research to Policy and Practice to Support Youth Impacted by Commercial Sexual Exploitation (CSE)* (2020), available at <https://lacounty.gov/wp-content/uploads/CSE-Research-to-Action-Brief.pdf>.
- <sup>9</sup> Allison Newcombe, Erin French, Kate Walker Brown, & Michelle Guymon, National Center for Youth Law & Los Angeles County, *Building Bridges: How Los Angeles County Came Together to Support Children and Youth Impacted by Commercial Sexual Exploitation* (2020), available at <https://lacounty.gov/wp-content/uploads/LA-County-Story-Building-Bridges.pdf>.
- <sup>10</sup> See Kate Walker & Fiza Quraishi, *Los Angeles County Law Enforcement First Responder Protocol for Commercially Sexually Exploited Children* (2015) available at [https://youthlaw.org/sites/default/files/attachments/2022-03/Los-Angeles-County-Law-Enforcement-First-Responder-Protocol\\_0.pdf](https://youthlaw.org/sites/default/files/attachments/2022-03/Los-Angeles-County-Law-Enforcement-First-Responder-Protocol_0.pdf); Allison Newcombe, Erin French, Mae Ackerman-Brimberg, & Kate Walker Brown, *Los Angeles Law Enforcement First Responder Protocol for Commercially Sexually Exploited Children, What We've Learned: A Six Year Review* (2020), available at [https://youthlaw.org/sites/default/files/attachments/2022-03/FRP6Year\\_210120-1-Final.pdf](https://youthlaw.org/sites/default/files/attachments/2022-03/FRP6Year_210120-1-Final.pdf).
- <sup>12</sup> See Kate Walker Brown, Fiza Quraishi, Allison Newcombe, Mae Ackerman Brimberg, & Michelle Guymon, National Center for Youth Law & Los Angeles County Probation Department,

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*Los Angeles County Detention Interagency Identification and Response Protocol for Commercially Sexually Exploited Children & Youth* (2019), available at [https://lacounty.gov/wp-content/uploads/FRP6Year\\_210120-1-Final-1.pdf](https://lacounty.gov/wp-content/uploads/FRP6Year_210120-1-Final-1.pdf).

<sup>12</sup> See Brown et al., *supra* note 13; see also Newcombe et al., *supra* note 11.

<sup>13</sup> Dierkhising et al., *supra* note 9 at 98.

<sup>14</sup> Dierkhising et al., *supra* note 9; see also KidsData, *Los Angeles County Child Population by Race/Ethnicity*, [WWW.KIDSDATA.ORG](http://WWW.KIDSDATA.ORG), <https://www.kidsdata.org/topic/33/child-population-race/pie#fmt=144&loc=364&tf=88&ch=7,11,726,10,72,9,73,87&pdist=73> (last accessed April 18, 2022)

<sup>15</sup> Elizabeth S. Barnert, Sarah M. Godoy, Ivy Hammond, et al., *Journal of American Pediatrics, Pregnancy Outcomes Among Girls Impacted by Commercial Sexual Exploitation* (2019), available at [https://www.academicpedsjnl.net/article/S1876-2859\(19\)30507-8/fulltext](https://www.academicpedsjnl.net/article/S1876-2859(19)30507-8/fulltext).

<sup>16</sup> Scott Schwebke, DA Gascón Announces Diversion Program for Human Trafficking Victims, Mar. 31, 2022, [https://www.dailynews.com/2022/03/31/da-gascon-announces-diversion-program-for-human-trafficking-victims/?utm\\_source=Free+to+Thrive&utm\\_campaign=381a56031e-EMAIL\\_CAMPAIGN\\_2022\\_03\\_30\\_07\\_55&utm\\_medium=email&utm\\_term=0\\_be54686c94-381a56031e-237076662](https://www.dailynews.com/2022/03/31/da-gascon-announces-diversion-program-for-human-trafficking-victims/?utm_source=Free+to+Thrive&utm_campaign=381a56031e-EMAIL_CAMPAIGN_2022_03_30_07_55&utm_medium=email&utm_term=0_be54686c94-381a56031e-237076662)

<sup>17</sup> See generally Dierkhising et al., *supra* note 9; Kate Walker Brown, Mae Ackerman-Brimberg, & Allison Newcombe, National Center for Youth Law, *Strategies to End Commercial Sexual Exploitation of Youth: A Toolkit for Collaborative Action* (2021); Newcombe et al., *supra* note 11.

<sup>18</sup> See CSEC Action Team, [WWW.YOUTHLAW.ORG](http://WWW.YOUTHLAW.ORG), <https://youthlaw.org/csec-action-team> (last accessed April 18, 2022).

<sup>19</sup> Kate Walker Brown, Mae Ackerman-Brimberg, & Allison Newcombe, National Center for Youth Law, *Strategies to End Commercial Sexual Exploitation of Youth: A Toolkit for Collaborative Action* (2021).

<sup>20</sup> See Advisory Board for the CSEC Action Team, [WWW.YOUTHLAW.ORG](http://WWW.YOUTHLAW.ORG), <https://youthlaw.org/advisory-board-csec-action-team> (last accessed April 18, 2022)

<sup>21</sup> Justice for Survivors Act of 2021, A.B. 124 (2021).

<sup>22</sup> Kate Walker, California Child Welfare Council, *Ending the Commercial Sexual Exploitation of Children: A Call for Multi-System Collaboration in California* (2013), available at [https://youthlaw.org/sites/default/files/attachments/2022-03/Ending-CSEC-A-Call-for-Multi-System\\_Collaboration-in-CA.pdf](https://youthlaw.org/sites/default/files/attachments/2022-03/Ending-CSEC-A-Call-for-Multi-System_Collaboration-in-CA.pdf).

<sup>23</sup> *E.g.*, Justice for Survivors Act, *supra* note 25; Sara's Law, H.R. 1950 (2019-2020).

<sup>24</sup> See Advisory Board for the CSEC Action Team, [WWW.YOUTHLAW.ORG](http://WWW.YOUTHLAW.ORG), <https://youthlaw.org/advisory-board-csec-action-team> (last accessed April 18, 2022); Reproductive Health Equity Project for Foster Youth, Youth Advisory Board, [WWW.FOSTERREPROHEALTH.ORG](http://WWW.FOSTERREPROHEALTH.ORG), <https://fosterreprohealth.org/youth-advisory-board/> (last accessed April 18, 2022).

<sup>25</sup> See Los Angeles Youth Commission, [HTTPS://YOUTHCOMMISSION.LACOUNTY.GOV/](https://youthcommission.lacounty.gov/), (last accessed April 18, 2022).

<sup>26</sup> Justice for Survivors Act of 2021, A.B. 124 (2021).