



FinCEN NOTICE

FIN-2026-NTC1

May 11, 2026

FinCEN Notice on the Threat of Human Trafficking During the 2026 FIFA World Cup

Suspicious Activity Report (SAR) Filing Request:

FinCEN requests that financial institutions reference this Notice in SAR field 2 (Filing Institution Note to FinCEN) and the narrative by including the key term “FIN-2026-HTWORLDCUP” and select SAR Field 38(h) (human trafficking).

The U.S. Department of the Treasury’s (Treasury) Financial Crimes Enforcement Network (FinCEN) is issuing this Notice to urge financial institutions¹ to be vigilant in detecting, identifying, and reporting suspicious activity connected to human trafficking² associated with the 2026 Fédération Internationale de Football Association (FIFA) World Cup.³ While human trafficking is an ever-present threat in the United States, major events such as the 2026 FIFA World Cup can create a concentrated demand for licit and illicit services, including commercial sex acts and involuntary servitude, resulting in increased vulnerability for human trafficking.⁴

Individuals visiting or residing near World Cup host cities may be vulnerable to trafficking by perpetrators seeking to exploit increased economic activity surrounding such events.

The United States, along with Canada and Mexico, will host the 2026 FIFA World Cup from June 11 to July 19, 2026, in Atlanta, Boston, Dallas, Houston, Kansas City, Los Angeles, Miami, New York/New Jersey, Philadelphia, the San Francisco Bay Area, and Seattle; as well as Toronto and Vancouver in Canada; and Guadalajara, Mexico City, and Monterrey in Mexico.⁵ FinCEN is

1. See 31 U.S.C. § 5312(a)(2); 31 C.F.R. § 1010.100(t).
2. Human trafficking, also known as trafficking in persons, is a crime that involves compelling or coercing a person to provide labor or services, or to engage in commercial sex acts. See U.S. Department of Justice, [“What is Human Trafficking?”](#) (last visited May 2026); see also 18 U.S.C. §§ 1581, 1584, 1589, 1590, 1591, 2421, 2422, 2423, 2425; 22 U.S.C. §§ 7102(4), (11); The Victims of Trafficking and Violence Protection Act of 2000 (Pub. L. No. 106-386); Polaris, [“Understanding Human Trafficking”](#) (last visited May 2026); U.S. Department of State, [“2025 Trafficking in Persons Report”](#) (“State 2025 Trafficking in Persons Report”).
3. The U.S. host cities for the 2026 FIFA World Cup have undertaken initiatives and developed strategies to combat human trafficking during the World Cup. See, e.g., SeattleFWC26, [“Seattle’s Human Trafficking Prevention Initiative for FIFA World Cup 2026”](#) (last visited May 2026); HoustonFWC26, [“Human Rights Action Plan”](#) (last visited May 2026).
4. See Testimony of Yasmin Vafa, Executive Director Rights4Girls, [“A Scourge Against Humanity: Addressing Human Trafficking at Mass Gatherings”](#) (“Testimony of Yasmin Vafa”) (Dec. 17, 2025), at pp. 1-2; U.S. Department of Homeland Security (DHS), [“Human Trafficking and Large-Scale Sporting Events”](#) (“DHS: Human Trafficking Bulletin”) (Jan. 2026).
5. On March 7, 2025, President Trump established a White House Task Force on the FIFA World Cup 2026, of which the Secretary of the Treasury is a member. See White House, [“Establishing The White House Task Force on the FIFA World Cup 2026”](#) (Mar. 7, 2025). FinCEN has coordinated with the Task Force and member agencies in developing this Notice.

issuing this Notice to support Federal and state law enforcement agencies in protecting victims and identifying suspicious activity potentially indicative of human trafficking around the 2026 FIFA World Cup. FinCEN recommends increased vigilance by financial institutions located in and around host city locations associated with the 2026 FIFA World Cup. It is also critical that customer-facing financial institution staff are aware of behavioral indicators that may indicate human trafficking, as victims of human trafficking may have no contact with people outside of their traffickers other than when visiting financial institutions.⁶

FinCEN is committed to countering human trafficking in all its forms, including countering the activities of Transnational Criminal Organizations (TCOs) that may perpetrate these heinous crimes.⁷ Human trafficking and TCOs are two of FinCEN’s Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) National Priorities.⁸ Treasury’s 2026 U.S. National Money Laundering Risk Assessment also notes human trafficking is estimated to be a multi-billion dollar industry that generates substantial illicit proceeds for TCOs and associated networks, creating risks in the U.S. financial system.⁹ This Notice also supports an objective of Executive Order (E.O.) 14159, *Protecting the American People Against Invasion*, specifically, dismantling cross-border human trafficking networks.¹⁰

FinCEN strongly encourages financial institutions to notify law enforcement of suspected human trafficking-related activity via the National Human Trafficking Hotline, in addition to filing SARs regarding human trafficking activity related to the 2026 FIFA World Cup as soon as possible regardless of threshold. FinCEN also encourages information sharing among financial institutions to identify, report, and prevent human trafficking-related activity. Financial institutions and associations of financial institutions sharing information under the safe harbor authorized by section 314(b) of the USA PATRIOT Act are reminded that they may share information with one another regarding individuals, entities, organizations, and countries for purposes of identifying, and, where appropriate, reporting activities that may involve possible terrorist activity or money laundering related to human trafficking.¹¹ In accordance with the requirements of section 314(b)

6. For behavioral indicators of human trafficking, see FinCEN, FIN-2020-A008, “[Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity](#)” (Oct. 15, 2020); FinCEN, FIN-2014-A008, “[Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags](#)” (Sept. 11, 2014).
7. For previous FinCEN Advisory products on human trafficking and smuggling, see FinCEN, FIN-2023-Alert001, “[FinCEN Alert on Human Smuggling Along the Southwest Border of the United States](#)” (Jan. 13, 2023); FinCEN, FIN-2020-A008, “[Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity](#)” (Oct. 15, 2020); FinCEN, FIN-2014-A008, “[Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags](#)” (Sept. 11, 2014).
8. See FinCEN, “[Anti-Money Laundering and Countering the Financing of Terrorism National Priorities](#)” (June 30, 2021).
9. See Treasury, “[2026 National Money Laundering Risk Assessment](#)” (“2026 NMLRA”) (Mar. 2026), at p. 27.
10. Section 6 of the E.O. directs the Attorney General and the Secretary of Homeland Security to jointly establish Homeland Security Task Forces in every state whose objective is “to end the presence of criminal cartels, foreign gangs, and TCOs throughout the United States; dismantle cross-border human smuggling and trafficking networks; end the scourge of human smuggling and trafficking, with a particular focus on such offenses involving children; and ensure the use of all available law enforcement tools to faithfully execute the immigration laws of the United States.” E.O. 14159, *Protecting the American People Against Invasion*, 90 Fed. Reg. 8443 (Jan. 20, 2025).
11. See generally, FinCEN, “[Section 314\(b\) Fact Sheet](#)” (Dec. 2020).

and its implementing regulations, FinCEN strongly encourages such voluntary information sharing. Further, in accordance with FinCEN guidance, FinCEN also strongly encourages appropriate voluntary cross-border information sharing between and among financial institutions, including appropriate foreign financial institutions.¹²

The information in this Notice is derived from Bank Secrecy Act data, open-source reporting, and information provided by law enforcement.

Human Trafficking Vulnerabilities During Major Events

The 2026 FIFA World Cup is expected to draw millions of visitors to host cities in the United States, Canada, and Mexico over the span of two months. This influx of foreign and domestic visitors can create increased vulnerability for individuals to be trafficked and concentrates demand for victims who are trafficked for the purposes of sex or labor. Major events such as the 2026 FIFA World Cup create opportunities for traffickers to take advantage of the inundation of tourists, increased hotel bookings, and the subsequent increase in demand for licit and illicit services.¹³ There is no specific profile for a trafficked victim, as traffickers are willing to exploit anyone who can earn them illicit profits, but certain groups may be at an increased risk of being trafficked.¹⁴

*Sex Trafficking*¹⁵

Victims of trafficking may be compelled by force, fraud, or coercion to engage in commercial sex acts.¹⁶ Sex trafficking may exist within varied settings, including in public on city streets and at truck stops, as well as within illicit massage businesses, escort services, residential brothels, strip clubs, hostess clubs, hotels, and motels.¹⁷ Sex traffickers may recruit victims and advertise opportunities to engage in commercial sex acts online through websites, social media, or other digital platforms.¹⁸ According to law enforcement, victims may be forced to travel frequently to meet clients for commercial sex acts within short timeframes, and the victims or their traffickers may have unusually large travel-related transactions. Victims often receive payment for

12. See FinCEN, "[Cross-Border Information Sharing by Financial Institutions and SAR Confidentiality](#)" (Sept. 5, 2025).

13. See Testimony of Yasmin Vafa, *supra* note 4, at pp. 1-2; DHS, "[Behind the Crowd: See What Others Miss at Big Games](#)" (last updated Jan. 15, 2026).

14. According to DHS, individuals at increased vulnerability to human trafficking may include: "Individuals who have experienced childhood abuse or neglect; Children and youth involved in the foster care and juvenile justice systems; People experiencing homelessness; Individuals living in poverty; Survivors of violence such as intimate partner or domestic violence; Unaccompanied alien children; Individuals displaced due to political instability, war, and disaster; and Individuals working in industries with fewer legal protections." See DHS, "[Human Trafficking Quick Facts](#)" ("DHS: Human Trafficking Quick Facts") (last updated May 22, 2025); see also National Human Trafficking Hotline, "[Recognizing the Signs](#)" (last visited May 2026).

15. Severe forms of trafficking in persons include sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age. The term "sex trafficking" means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act. See 22 U.S.C. § 7102(11)(A), (12).

16. See State 2025 Trafficking in Persons Report, *supra* note 2.

17. See National Human Trafficking Hotline, "[Sex Trafficking](#)" (last visited May 2026).

18. See DHS: Human Trafficking Quick Facts, *supra* note 14; Federal Bureau of Investigation, I-031620-PSA, "[Human Traffickers Continue to Use Popular Online Platforms to Recruit Victims](#)" (Mar. 16, 2020).

commercial sex acts in cash but may also receive payments via peer-to-peer (P2P) transfers, credit card transactions, and digital assets.¹⁹ Law enforcement and BSA data also identified a trend of prepaid access cards being used to pay for commercial sex acts beginning in 2020.²⁰ According to law enforcement, victims are often instructed to deposit cash received in exchange for commercial sex acts into easily accessible automated teller machines (ATMs) and then transfer these funds to another account. In cases where victims are paid through P2P transfers, the victims are typically instructed by their traffickers to quickly transfer these funds via P2P to another account.

*Labor Trafficking*²¹

Seemingly legitimate businesses in major event locations may use exploitative employment of victims to meet the increased demand for labor and services during these events. Victims may be lured into employment by recruiters or misled to believe that they are obtaining lawful employment for their labor or services.²² These victims may be exploited for their labor through the use of force, fraud, or coercion.²³ A victim's wages may be withheld entirely or partially by their traffickers, indicated by an absence or deviation of expected payroll expenses, or wages may be transferred from the victim's account to their traffickers. Victims of trafficking may also have minimal or no transactions associated with maintaining essential needs, given the trafficker's financial control over the victim.

Red Flag Indicators of Human Trafficking

FinCEN has identified the following red flag indicators to help financial institutions detect, prevent, and report potentially suspicious activity related to human trafficking, including trafficking associated with major events. Because no single red flag is determinative of illicit or other suspicious activity, financial institutions should consider the surrounding facts and circumstances, such as a customer's historical financial activity, whether the transactions are in line with prevailing business practices, and whether the customer exhibits multiple related red flags, before determining if a transaction or attempted transaction is indicative of human trafficking or is otherwise suspicious. In addition to the red flags below, financial institutions should also be aware of the transactional and behavioral red flags identified in previous human trafficking-related FinCEN Advisory products, as those remain valid.²⁴

19. See 2026 NMLRA, *supra* note 9, at p. 27.

20. For more information on the use of prepaid access cards in human trafficking, see Polaris, "[Case Studies: Prepaid Cards](#)" (last accessed Apr. 2026); Polaris "[Case Studies: Gift Cards](#)" (last accessed Apr. 2026).

21. Severe forms of trafficking in persons includes the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. See 22 U.S.C. § 7102(11)(B).

22. See DHS, "[What is Forced Labor?](#)" ("DHS: What is Forced Labor") (last updated Sept. 23, 2025); National Human Trafficking Hotline, "[Labor Trafficking](#)" (last visited May 2026).

23. See State 2025 Trafficking in Persons Report, *supra* note 2. Victims of labor trafficking are often isolated by their employers or traffickers who seek to monitor or restrict their movements. See also DHS: What is Forced Labor, *supra* note 22.

24. See FinCEN, FIN-2020-A008, "[Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity](#)" (Oct. 15, 2020); FinCEN, FIN-2014-A008, "[Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags](#)" (Sept. 11, 2014).

- 1 A customer in or around a city hosting a major event has unusually large local travel expenses (e.g., multiple hotel rooms, taxi or ridesharing fares, train tickets) in a relatively short period of time, especially expenses occurring during late night and early morning hours, for no business or apparent lawful purpose.
- 2 A customer's account has few or no transactions indicative of obtaining or maintaining essential needs (e.g., housing, personal products and nourishment, travel) and may only receive credits from multiple third parties or a direct deposit or paycheck that is immediately transferred to a singular individual or business account.
- 3 A customer's account has an unusually high number of transactions involving essential needs (e.g., multiple payments for housing or lodging, bulk purchases of personal products and goods for nourishment, travel-related expenses) or bulk purchases of prepaid access cards for no business or apparent lawful purpose.
- 4 A customer's business account does not exhibit normal or expected payroll expenditures for any readily discernible reason. For example, the customer's business transactions indicate that payroll is nonexistent or extremely low compared to businesses in the same industry with similar profiles.
- 5 A customer deposits funds into an account at a location other than where the customer resides and the funds are quickly withdrawn, typically in a separate location from the deposits, for no business or apparent lawful purpose.
- 6 A customer frequently deposits or withdraws cash at ATMs, especially ATMs located at gas stations, particularly if the transactions occur between 10:00pm and 5:00am. The customer may quickly transfer deposited funds via P2P transfers to a separate account for no business or apparent lawful purpose.
- 7 A customer regularly receives multiple P2P transfers from accounts with which the customer has no previous transactional relationships and for which there is no business or apparent lawful purpose. Payment memos may indicate or contain vague references disguising payment for commercial sex (e.g., "link," "services," "donation," "personal care," "wellness," "advertisements," etc.).²⁵ These funds are then further sent via P2P, in whole or in part, to another account.
- 8 A customer receives frequent P2P transfers from multiple accounts and seems to be consolidating funds received by others via P2P transfers for no business or apparent lawful purpose. This activity may be indicative of the movement of funds related to sex trafficking.
- 9 A customer sends three rapid, sequential P2P transfers to three separate accounts for no business or apparent lawful purpose. Such payments may indicate illicit massage business payments, where a customer is expected to make three payments, specifically a door fee, a service fee, and a tip for services provided.

25. See DHS: Human Trafficking Bulletin, *supra* note 4.

10 The phone number associated with a customer’s account is listed as a contact method in online commercial sex advertisements. This could be potentially indicative of either a victim’s or a trafficker’s account.

Financial institutions filing Suspicious Activity Reports (SARs) on human trafficking associated with the 2026 FIFA World Cup should reference this Notice in SAR field 2 (Filing Institution Note to FinCEN) and the narrative by including the key term “**FIN-2026-HTWORLDCUP**” and select SAR field 38(h) (human trafficking).

Reporting Suspected Human Trafficking

In addition to filing SARs, covered financial institutions should be aware of the following resources to assist victims and report suspected human trafficking. When reporting suspected human trafficking, it is critical to include as many details about the suspected victim or trafficker as possible. If you suspect a customer is a trafficker or a victim of human trafficking, do not approach them with these concerns, but instead immediately contact law enforcement.

If you believe you may have information about a trafficking situation:

- **Call the National Human Trafficking Hotline toll-free hotline at 1-888-373-7888:** Anti-Trafficking Hotline Advocates are available 24/7 to take reports of potential human trafficking.
- **Text the National Human Trafficking Hotline at 233733.**
- **Chat the National Human Trafficking Hotline via humantraffickinghotline.org/chat.**
- **Submit a tip online through the anonymous [online reporting form](#).** However, please note that if the situation is urgent or occurred within the last 24 hours the hotline encourages you to call, text, or chat.

The Financial Crimes Enforcement Network’s Advisory Program communicates priority money laundering, terrorist financing, and other illicit finance threats and vulnerabilities to the U.S. financial system. Financial institutions may use this information to support effective, risk-based, and reasonably designed anti-money laundering and countering the financing of terrorism (AML/CFT) programs and suspicious activity monitoring systems to help generate highly useful information for law enforcement and national security agencies.

For Further Information

FinCEN's website, at www.fincen.gov, contains information on how to register for FinCEN Updates emails which are sent when new content is added to the site. Questions or comments regarding the contents of this Notice should be addressed to the FinCEN Regulatory Support Section by submitting an inquiry at www.fincen.gov/contact.

The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from illicit activity, counter money laundering and the financing of terrorism, and promote national security through strategic use of financial authorities and the collection, analysis, and dissemination of financial intelligence.