White Collar Defense & Investigations Update

May 2026

FinCEN Issues Notice on Human Trafficking Threats During the 2026 FIFA World Cup

Key Notes:

- FinCEN's Notice targets human trafficking risks tied to the 2026 FIFA World Cup.
- The Notice's impact extends beyond banks to non-financial businesses.
- Non-bank companies should take proactive compliance steps now.

Overview

On May 11, 2026, the U.S. Department of the Treasury's Financial Crimes Enforcement Network ("FinCEN") issued a notice (FIN-2026-NTC1) urging financial institutions to be vigilant in detecting, identifying, and reporting suspicious activity connected to human trafficking associated with the 2026 FIFA World Cup. FinCEN warns that while human trafficking is an ever-present threat, major events like the World Cup can create concentrated demand for both lawful and illicit services, increasing vulnerability to trafficking.

The World Cup will run from June 11 to July 19, 2026, across 11 U.S. host cities, as well as cities in Canada and Mexico. FinCEN recommends increased vigilance by financial institutions in and around these locations and developed the notice in coordination with the White House Task Force on the FIFA World Cup 2026.

Scope and Applicability

Although formally directed at financial institutions under the Bank Secrecy Act, the notice's practical impact may extend well beyond banks. Private litigants may cite the notice to argue that other industries—such as hotels, ground and air transportation, retail, and staffing companies—were on notice regarding trafficking risks and should have been alert to them.

Companies in the hospitality, transportation, and staffing sectors should take particular note. Those that rely on contractors face additional due diligence training challenges, as they may need to extend trafficking awareness throughout their supply chains and workforce.

Red Flag Indicators

FinCEN has identified 10 red flag indicators to assist in detecting suspicious activity. No single red flag is determinative; institutions should consider the totality of the circumstances, including historical financial activity and whether multiple red flags are present. The key indicators include:

1. Unusually large local travel expenses in a short period near a host city, especially during late-night or early-morning hours, with no business or apparent lawful purpose.
2. Few or no transactions for essential needs, with credits from multiple third parties or direct deposits immediately transferred to a single individual or business account.
3. An unusually high volume of transactions for lodging, personal goods, travel, or bulk purchases of prepaid access cards with no apparent lawful purpose.
4. A business account with nonexistent or abnormally low payroll expenditures relative to comparable businesses in the same industry.
5. Deposits at a location other than the customer's residence followed by quick withdrawals at a

different location, with no apparent lawful purpose.

6. Frequent ATM cash deposits or withdrawals — especially at gas stations between 10:00 p.m. and 5:00 a.m.—followed by rapid peer-to-peer ("P2P") transfers to a separate account.
7. Multiple P2P transfers from accounts with no prior transactional relationship, particularly where payment memos contain vague references such as "link," "services," "donation," "personal care," "wellness," or "advertisements."
8. Consolidation of P2P transfers from multiple accounts into a single account with no apparent lawful purpose, potentially indicative of sex-trafficking proceeds.
9. Three rapid, sequential P2P transfers to three separate accounts, potentially indicating illicit massage business payments structured as a door fee, service fee, and tip.
10. A phone number linked to the customer's account appears in online commercial sex advertisements.

SAR Filing Requirements

Financial institutions filing Suspicious Activity Reports (“SARs”) related to World Cup trafficking activity must include the key term **"FIN-2026-HTWORLDCUP"** in SAR field 2 and the narrative and select SAR field 38(h) for human trafficking. FinCEN strongly encourages filing such SARs as soon as possible, regardless of the dollar threshold.

FinCEN also encourages notification to law enforcement through the National Human Trafficking Hotline and encourages institutions to share information with one another under the Section 314(b) safe harbor of the USA PATRIOT Act.

Recommended Actions

In light of the FinCEN notice, companies and financial institutions should consider taking the following steps in advance of the World Cup:

Financial institutions should update their AML/CFT compliance programs and monitoring systems to incorporate the notice's red flag indicators. Customer-facing staff should receive targeted training on behavioral indicators, as trafficking victims may have no contact with anyone outside their traffickers other than at financial institutions. Banks should consider directing staff to err on the side of filing a SAR for any activity that seems out of the ordinary.

Non-financial businesses in or around host cities—particularly hospitality, transportation, staffing, and retail—should familiarize themselves with the red flag indicators and implement internal protocols to detect and report potential trafficking.

Guidance for Non-Bank Clients

Although the FinCEN notice does not impose direct regulatory obligations on non-financial businesses, it creates a heightened awareness environment that may carry significant legal and reputational consequences. Non-bank clients should consider the following steps:

First, companies should assess their exposure. Any business that will experience increased foot traffic, bookings, or labor demand during the World Cup period—especially in the 11 U.S. host cities—should evaluate whether its operations touch potential trafficking vectors. Hotels, event venues, transportation network companies, staffing agencies, and food service providers are among the most exposed sectors.

Second, companies should train frontline personnel. Customer-facing employees—such as hotel front desk staff, rideshare drivers, event security, and temporary labor supervisors—should be trained to recognize behavioral indicators of trafficking, such as individuals who appear to be controlled by others, lack identification documents, show signs of physical abuse or malnourishment, or are unable to speak freely. Companies relying on contractors or subcontractors should ensure these training requirements extend throughout the supply chain.

Third, companies should establish internal reporting channels. Businesses should implement clear protocols for employees to report suspected trafficking without confronting the individual involved, including designated points of contact and escalation procedures that route concerns to law enforcement.

Fourth, companies should document compliance efforts. Because the notice may be cited in future litigation to establish that businesses were on notice of trafficking risks during the World Cup, companies should maintain records of their training programs, internal policies, and any reports made to authorities. Such documentation may serve as evidence of reasonable diligence in the event of subsequent claims.

Fifth, companies should review vendor and contractor agreements. Businesses that engage temporary labor, subcontractors, or staffing agencies for World Cup-related operations should review those agreements for anti-trafficking representations, audit rights, and termination provisions triggered by trafficking-related conduct.

Conclusion

The FinCEN notice underscores the government's commitment to leveraging the financial system against human trafficking, with implications extending well beyond banks. Companies doing business in the United States, particularly those operating in or near World Cup host cities, should take proactive compliance steps now. Our team is available to assist with compliance reviews, staff training, and development of internal protocols tailored to the risks highlighted in the notice.

The National Human Trafficking Hotline is available 24/7 at (888) 373-7888, by text at 233733, or via humantraffickinghotline.org. If trafficking is suspected, do not approach the individual; contact law enforcement immediately.

FOR MORE INFORMATION

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