



## **FinCEN Issues Notice on Human Trafficking Risks Associated with the 2026 FIFA World Cup**

On May 11, 2026, the Financial Crimes Enforcement Network (FinCEN) issued a Notice urging financial institutions to remain vigilant in detecting and reporting suspicious activity related to human trafficking associated with the 2026 FIFA World Cup, which will be hosted across the United States, Canada, and Mexico from June 11 through July 19, 2026. The Notice is intended to support law enforcement efforts to protect victims and ensure that customer-facing financial institution personnel are familiar with behavioral indicators associated with human trafficking, as victims may have limited contact with individuals outside of their traffickers other than during interactions with financial institutions.

### **Red Flag Indicators of Human Trafficking**

FinCEN warns that major international events such as the 2026 FIFA World Cup can create concentrated demand for both licit and illicit services, thereby increasing vulnerabilities to human trafficking activity. In particular, transnational criminal organizations (TCOs) may exploit online platforms, social media, and seemingly legitimate labor operations to recruit and exploit victims of sex trafficking and labor trafficking. Accordingly, FinCEN encourages financial institutions to remain alert to several typologies associated with human trafficking activity, including:

- Rapid movement of funds through peer-to-peer (P2P) payment applications.
- Frequent ATM cash deposits and withdrawals, particularly during late-night and early-morning hours.
- Multiple hotel, rideshare, train, and travel-related expenses incurred within short periods of time without an apparent lawful business purpose.
- Transfers of payroll or direct deposits that are immediately moved to another account.
- Bulk purchases of prepaid access cards for no business or apparent lawful purpose;
- Frequent P2P transfers using vague payment memos such as “services,” “donation,” “wellness,” “personal care,” or “advertisements”
- Funnel account activity involving deposits in one geographic area followed by rapid withdrawals elsewhere.

- Consolidation of multiple incoming P2P payments into a single account without a legitimate business reason.

### **Reporting Expectations**

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 filing SARs related to suspected human trafficking activity associated with the 2026 FIFA World Cup should reference this Notice in SAR field 2 (Filing Institution Note to FinCEN) and in the SAR narrative using the key term: “FIN-2026-HTWORLDCUP” and select SAR field 38(h) (human trafficking).

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