

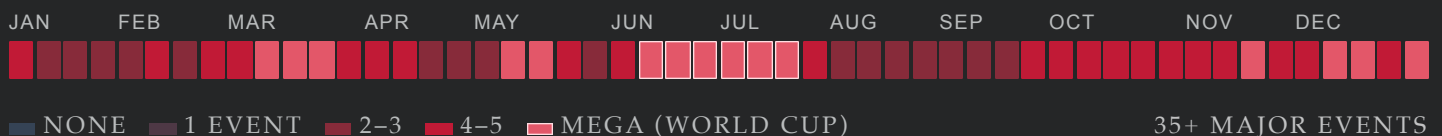
Beyond the Mega Event

Detecting human trafficking and exploitation risk in South Florida's persistent event economy.

The World Cup arrives in weeks. But the trafficking risk it amplifies has been here for decades. This guide equips BSA / AML teams to address both. corridor by corridor, event by event, indicator by indicator.

SOUTH FLORIDA EVENT DENSITY, 52 WEEKS, 2026

THERE IS NO OFF-SEASON



ASSESS → APPLY → DETECT → INVESTIGATE → REPORT → TRAIN

PRACTITIONER REFERENCE GUIDE

Tailored for the tri-county area, Built for the event economy
Use with internal data now. Expand with digital data packs.
ACAMS South Florida Chapter, May 2026

Our approach.

A practical, step-by-step reference guide for financial institutions in South Florida's tri-county area. It mirrors the **RedFlag Accelerator** methodology while embedding the laws, cases, industries, corridors and data sources specific to Miami-Dade, Broward and Palm Beach counties.

EXECUTIVE SUMMARY BRIEF

PURPOSE

Detect and investigate human trafficking and exploitation, amplified by South Florida's event economy. Sporting events, festivals, cruise tourism, conventions and agricultural seasons produce year-round, predictable risk.

FOR WHOM

AFC leadership on strategic approach and controls. **BSA/AML analysts** triaging alerts. **Fraud analysts** on scam-to-trafficking bridges. **Investigators** building cases. **Frontline staff** observing non-transactional and physical indicators.

METHODOLOGY

Persona - a target customer profile, such as a trafficker. **Red flag** - a behavior or characteristic to identify a persona. This guide is built from 400+ sources, 13 corridors, 35+ events, 103 red flags, and 10 data packs.

01 · SCALE

South Florida hosts at least 35 major events annually. There is no off-season. Risk is structural, not episodic.

02 · DETECTION

Detection must run continuously, with event-calendar, corridor and contextual indicator overlays on transaction monitoring.

03 · DEPLOYMENT

You can self-assess in 2 days; deploy target internal data indicators in 2 weeks; implement the full events cycle with data packs in 2 months.

THE SIX-STAGE PATHWAY · CYCLICAL, NOT LINEAR

Each stage equips you to do one specific thing. Together, they form a closed loop, post-event review feeds back into assessment. Each pass refines detection.



Post-event review feeds back into ASSESS. Each cycle refines detection.

South Florida's persistent event economy.

Guides built only for the Super Bowl or the FIFA World Cup become irrelevant the week it ends. South Florida is analytically distinct: a persistent, year-round event economy that creates continuous churn in accommodation, mobility, staffing and nighttime activity. The World Cup lands in a region already shaped by Formula 1, Ultra, Art Basel, the Miami Open and year-round cruise tourism through the world's busiest ports. This is not a temporary spike. It is a sustained risk corridor.

THE PERSISTENT EVENT ECONOMY

Risk is not concentrated in once-a-decade mega events. It emerges in **persistent event economies** where overlapping events create continuous demand for short-term accommodation, temporary labor, and transient populations.

South Florida hosts **35 major events annually**. There is no off-season. Detection must be continuous, with event-calendar overlays on transaction monitoring. This guide reframes the problem from crisis response to structural risk management.

START HERE · DEPLOY THIS WEEK

WHAT YOU CAN DEPLOY WITH INTERNAL DATA IN TWO WEEKS

Ten indicators any bank in the tri-county area can implement today. No data packs. No licensing. Your data. The rest of this guide explains the context and the escalation logic that make these indicators meaningful.

01

Corridor ZIP filtering

Ingest 13 corridor ZIP tables into TMS geographic filters.

02

Event date windows

Add event calendar as pre / build-up / event / post window.

03

MCC overlay

Filter 7297, 7298, 7230, 5813, 6011, 6051 in corridor ZIPs.

04

After-hours clustering

Flag transactions from 10pm to 6am at high-risk MCCs.

05

Payroll vs. revenue

Compare revenue in vs. payroll out for service businesses.

06

Multi-sender P2P funnel

5+ P2P credits from different senders in event windows.

07

Double-charge pattern

2+ card charges same account / 60 min at MCC 7297, 7298.

08

Short-stay lodging cluster

Hotel MCC transactions in corridor ZIPs during events.

09

No-payroll / no-tax

Businesses with revenue but zero payroll or tax outflows.

10

Shared identifiers

Phones, addresses, emails shared across worker accounts.

DAYS

2

Run the self-assessment. Identify your corridors. Brief team leads.

WEEKS

2

Configure the target internal-data indicators above. Test alert routing.

MONTHS

2

Full implementation with data packs. Train all teams. Deploy event-period analyst queues.

STAGE 01. ASSESS

PAGES 05-08

EVENT CYCLE, SCALE, EDM, 13 CORRIDORS

01

Assess.

FOR AFC LEADERSHIP · COMPLIANCE LEADS

Know which corridors your customers operate in, when risk elevates, and whether this guide applies to your institution.

WHY THIS STAGE COMES FIRST

You cannot tune a transaction monitoring system to detect something you have not first described. Before configuring rules, scoring alerts, or writing SARs, you must answer three questions about your own institution's footprint.

WHEN

Where does your region sit in the permanent event cycle? 35+ major events mapped to trafficking signatures.

HOW MUCH

What is the underlying scale? 200,000 sex / 540,000 labor victims estimated in Florida (2024).

WHERE

Which of the 13 corridors do your customers transact in? EDM score determines posture.

WHAT THIS STAGE COVERS

- 01 The permanent event cycle.** Month-by-month signatures tied to 35+ South Florida events. Your "off-season" that is not.
- 02 The scale of risk.** Victim estimates, profit shares, SAR filings, adult-services density. The numbers your board should see.
- 03 The EDM score.** 5-factor corridor model. Baseline / Elevated / Heightened posture mapped to concrete rule changes.
- 04 The 13 risk corridors.** Geographic focus areas where trafficking risk concentrates. ZIP-level filters for your monitoring.

Before you can detect human trafficking in financial data, you need to understand the environment that produces it. Large events create demand surges → traffickers move victims → victims generate financial traces. The event calendar tells you **when**. The corridor map tells you **where**. The red flags tell you **what**.

● **ASSESS** —● APPLY —● DETECT —● INVESTIGATE —● REPORT —● TRAIN

Each event below creates distinct demand surges. Traffickers plan around these calendars. Your monitoring should too.

Note. Each event type creates a distinct financial signature. If your system does not account for these temporal and geographic patterns, suspicious activity looks indistinguishable from legitimate event-driven commerce.

ILO, Mar 2024
/ 2026 NMLRA
[8]

Victim estimates are from the USF Trafficking in Persons Lab, the most widely cited Florida-specific research institution. These are modelled estimates, not direct counts, and carry the limitations inherent in any prevalence study. They represent the best available jurisdiction-specific data and are consistent with federal estimates.

Every corridor carries a posture score. Use it to triage.

Risk follows the calendar. Read the next 30 days, not the next mega event.

Event Density Risk Model · EDRM

The EDRM answers one operational question: **how much monitoring attention does each corridor need right now?** It rates each of 13 corridors on a 5-25 scale across five weighted factors. The score determines the posture. The score is not static. it shifts as the event calendar changes.

THE FIVE FACTORS · WEIGHTED

Event overlap 25%

Concurrent events in corridor this week. Multiple events compound risk.

Accommodation pressure 20%

Hotel, STR, motel density. More venues = more exploitation opportunity.

Staffing volatility 20%

Seasonal hiring spikes. Volatility creates vulnerable worker pools.

Night-time economy 20%

Bar, club, adult venue concentration. Primary demand-side driver.

Historical enforcement 15%

Prior LE actions, arrests, SARs in corridor. Past activity validates risk.

WORKED EXAMPLE

Miami Gardens · COR-03 WORLD CUP WEEK, JUN 2026

Event overlap 25% ×	4.4	1.10
Accommodation 20% ×	3.8	0.76
Staffing volatility 20% ×	4.0	0.80
Night-time economy 20% ×	3.6	0.72
Enforcement history 15% ×	3.0	0.45

COMPOSITE

18.8 / 25

POSTURE, HEIGHTENED

WEIGHTS

5–10 BASELINE Standard monitoring. No event overlays. Routine alert handling.

11–17 ELEVATED Apply event scenarios. Review high-risk MCCs in corridor ZIPs. Increase analyst awareness.

18–25 HEIGHTENED Dedicated event-period queues. Accelerated triage. Full data-pack activation. Pre-event briefing.

HOW TO SCORE YOUR CORRIDORS

Rate each factor 1-5 using the rubric in the Event Atlas data pack. Multiply by weight. Sum. The total determines posture. Rescore when the event calendar changes.

Note. The posture levels are not advisory labels. They are operational instructions. Use posture to route analyst effort, not to replace judgment.

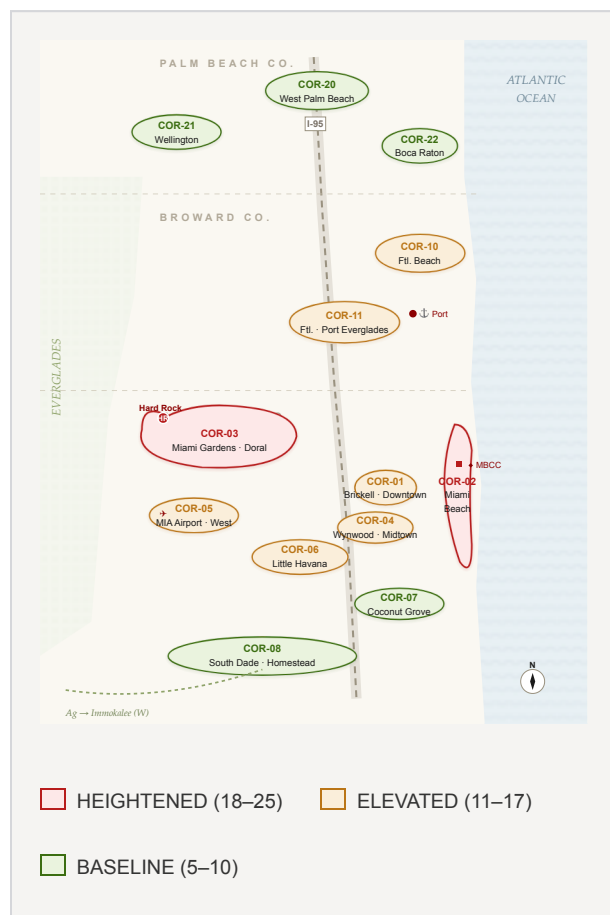
Note. Pre-event windows are when feeder-corridor inflows ramp up.

Watch I-75, I-95, and Cuba / PR maritime origins in the 2-6 weeks before any of the events above.

Thirteen places where event-driven risk concentrates.

Thirteen risk corridors, tri-county.

A risk corridor is a defined geographic area where trafficking risk concentrates due to events, venues, accommodation, labor demand, and the night-time economy. Corridors allow you to apply geographic filters to your TMS. Focus enhanced scrutiny where risk is elevated, when it is elevated.



ID	CORRIDOR	PRIMARY ZIPS	POSTURE	CHARACTERISTICS
COR-01	Downtown / Brickell	33131 33132 33130	Elevated	Financial district, Brickell nightlife, hotel concentration
COR-02	Miami Beach	33139 33140 33141	Heightened	Ocean Drive, MBCC, 300+ hotels, heavy STR stock
COR-03	Miami Gardens / Doral	33056 33054 33178	Heightened	Hard Rock Stadium, WC 2026 host, Calder Casino
COR-04	Wynwood / Midtown	33127 33137	Elevated	Art district, nightlife, warehouse events
COR-05	Airport / West	33126 33122 33166	Elevated	MIA airport, budget motel corridor, transit hub
COR-06	Little Havana	33135 33136 33128	Elevated	Calle Ocho, Latin nightlife corridor
COR-07	Coconut Grove	33133	Baseline	Residential, lower event density
COR-08	South Dade / Homestead	33030 33034 33035	Baseline	Agricultural proximity, migrant worker housing
COR-10	Fort Lauderdale Beach	33304 33316	Elevated	Beach tourism, spring break, Port Everglades
COR-11	Fort Lauderdale / Port	33312 33315	Elevated	Port Everglades, cruise terminal, hotel clusters
COR-20	West Palm Beach	33401 33407	Baseline	Convention center, moderate nightlife
COR-21	Wellington	33414	Baseline	Equestrian events, seasonal
COR-22	Boca Raton	33431 33432	Baseline	Resort / conference tourism

Note. Postures shown are baselines. During event windows, postures shift upward. Full corridor-week scoring in the Event Atlas data pack.

DOES THIS GUIDE APPLY TO YOUR INSTITUTION?

YES TO 2 OR MORE = DEPLOY APPLY NOW

- ☐ Customers with residences, premises or transactions in Heightened / Elevated corridor ZIPs
- ☐ Business customers in massage, spa, beauty, hospitality, construction, staffing or agriculture
- ☐ Payroll processing for construction subcontractors, staffing agencies or labor brokers
- ☐ STR operators, check-cashers or MSBs in event corridors
- ☐ Cruise-line, port-services, hotel-chain or stadium-vendor exposure

FEEDER PATHWAYS INTO THE TRI-COUNTY

South Florida is the terminus of national and hemispheric routes. Watch for inbound flows from these origins ahead of major events:

- I-75 corridor, Atlanta, Tampa, SW-FL agricultural
- Pan-American, Mexico, Central America via TX / NM
- I-95 / I-65, Carolinas, Mid-Atlantic, northern circuit
- Cuba, PR maritime, small-vessel landings, Keys corridor

STAGE 02. APPLY

PAGES 09-10

OVERLAY, TMS LADDER, LOOK-ALIKES, SCENARIOS

02

Apply.

FOR DETECTION CONFIGURATION

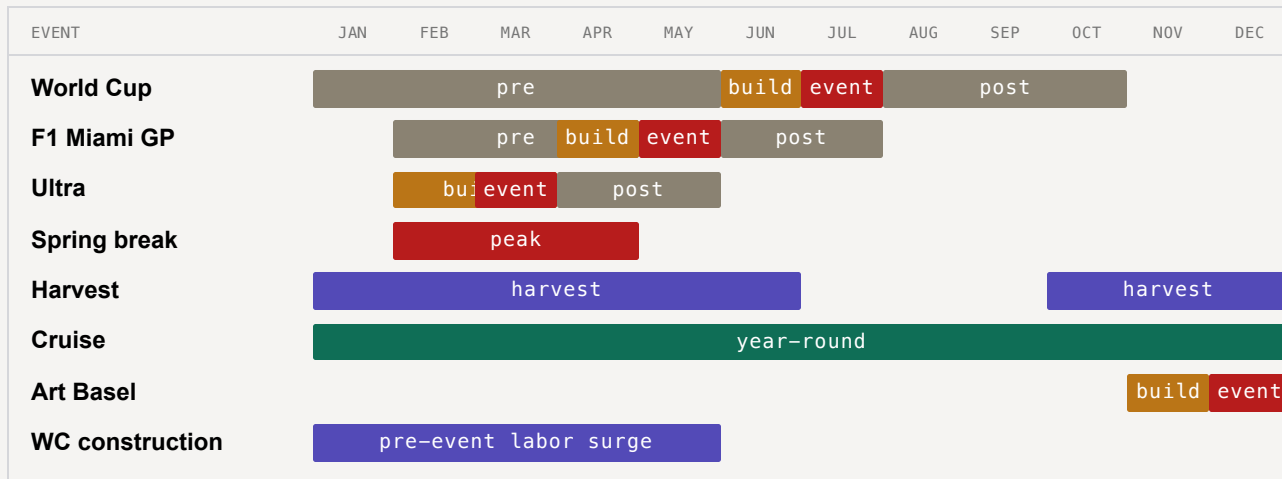
Configure your monitoring with corridor ZIPs, event windows, MCC overlays and alert routing rules.

BRIDGE · FROM ASSESS TO APPLY

ASSESS answered three questions: what drives trafficking risk (events), how severe (scale), and where it concentrates (corridors + EDRM). APPLY answers the fourth: **what do I do with that knowledge?** By the end of this section, you will have rules in your TMS, worked scenarios, and a clear picture of what you can do today vs what needs data packs.

MONITORING OVERLAY TIMELINE · 12 MONTHS

Four phases per event, overlap zones highlighted.



Overlap zones require elevated sensitivity across all active event scenarios: **March** (Ultra + Spring break + Harvest tail + Cruise) and **May-July** (F1 + World Cup build + World Cup event + Cruise).

● ASSESS —● **APPLY** —● DETECT —● INVESTIGATE —● REPORT —● TRAIN

Five monitoring configurations to deploy within 30 days.

Events-driven monitoring overlay.

Configure this as a contextual parameter in your monitoring rules: when an event window is active, lower alert thresholds for the indicators below and route alerts by EDRM posture.

EVENT / SEASON	TIMING	SEX	LABOR	KEY FINANCIAL INDICATORS
FIFA World Cup 2026	Jun–Jul	HIGH	HIGH	Hotel surges near Hard Rock, construction payroll anomalies, MSB, P2P clustering
Formula 1 Miami GP	May	MOD-HIGH	MOD	Hotel clusters in Miami Gardens, event-staffing, ride-share surges
Art Basel	Dec	MOD	LOW-MOD	Luxury venue payments, STR surges Miami Beach
Ultra Music Festival	Mar	MOD-HIGH	MOD	P2P surges, hotel bookings Downtown / Brickell
Spring break	Feb–Apr	HIGH*	LOW	P2P spikes in hotel districts *high risk for minors
Cruise tourism	Year-round	MOD	LOW-MOD	IMB / hotel activity near ports, port service labor
Harvest seasons	Oct–Jun	LOW	HIGH	Contractor cash withdrawals, H-2A payments, Immokalee corridor
Construction pre-event	6–18 mo	LOW	HIGH	Subcontractor shells, MSB payroll, Sunbiz phoenixing

HOW TO USE: At the start of the month, check which events are active or approaching in your corridors. Configure monitoring rules to flag the corresponding indicators. After the event, maintain enhanced monitoring for 1-3 months (post-event laundering).

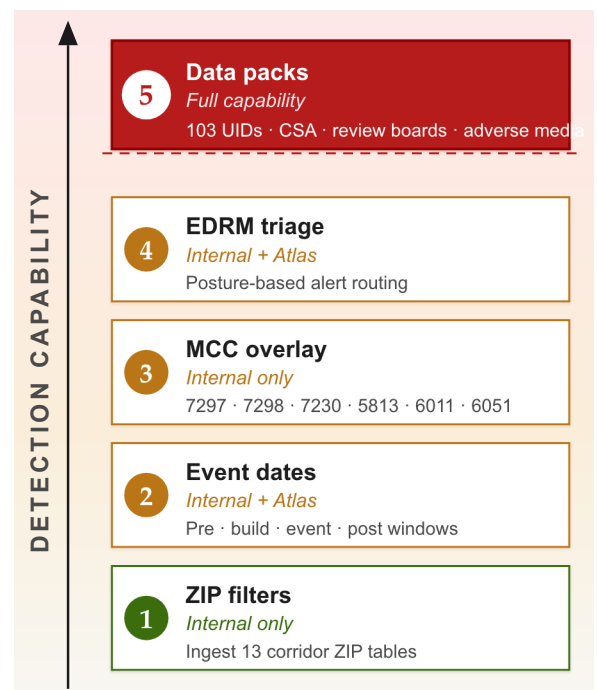
FinCEN FIN-2026-NTC1 identifies P2P memo keywords: 'link', 'services', 'donation', 'personal care', 'wellness', 'advertisements'.

HOW TO MONITOR

#	ACTION	DATA	SOURCE
1	Filter by corridor ZIP. ingest 13 tables into TMS geo-filters	ZIP codes	Internal + Event Atlas
2	Layer event dates. calendar as time window (pre 3–6 mo, build-up 1–4 wk, event ±5 d, post 1–3 mo)	Event dates	Internal + Event Atlas
3	Cross with MCCs. Sex 7297, 7298, 7230, 7273, 5813, 5967, Labor payroll, 6011, 6051, staffing, construction, 6513, Hospitality 7011, 7012, 4511, 4722, 4121	MCC data	Internal
4	Apply EDRM triage. Heightened → priority queue, Elevated → enhanced review, Baseline → standard	EDRM scores	Internal + Event Atlas
5	Ingest data packs. CSA descriptors, review boards, adverse media, labor OSINT, high-risk locations	External reference data	Data packs

Steps 1-4 are achievable with internal data. Step 5 unlocks full framework.

MONITORING CAPABILITY LADDER



A four-rung escalation ladder from alert to SAR.

Legitimate look-alikes.

Event-driven monitoring will generate alerts that reflect legitimate commerce. Before escalating, check these counter-indicators.

◆ LOOKS SUSPICIOUS

Hotel surge in corridor during event window

✓ LEGITIMATE IF

Business has normal payroll, tax footprint, and licensed staff count consistent with revenue

◆ LOOKS SUSPICIOUS

New massage business opened in event corridor

✓ LEGITIMATE IF

DBPR licence active, therapist count matches revenue, no review-board or CSA matches

◆ LOOKS SUSPICIOUS

Hospitality staffing company with seasonal payroll spike

✓ LEGITIMATE IF

Tax payments proportional to payroll, no MSB / check-casher processing, no Sunbiz phoenixing

◆ LOOKS SUSPICIOUS

Agricultural contractor with high cash activity during harvest

✓ LEGITIMATE IF

Payroll per H-2A worker above minimum wage, housing payments proportional, no DOL violations

◆ LOOKS SUSPICIOUS

Nightclub with elevated cash deposits during F1 weekend

✓ LEGITIMATE IF

Deposits proportional to prior-year event weekends, no after-hours anomaly, no P2P funnel pattern

FINCEN REMINDER

No single red flag alone is determinative. Suspicion must be evaluated in the context of the customer, sector norms, and seasonal patterns.

The event overlay increases sensitivity; it does not replace judgment.

Worked detection scenarios.

SCENARIO · IMB · SEX TRAFFICKING

MCC 7297, COR-02 ZIP 33139, pre-Art Basel

The business customer opened 5 months before Art Basel. Review-board match (UID 346). CSA descriptor match (UID 17). After-hours volume 2.8× baseline.

Why this is not normal event commerce:

Legitimate massage businesses do not appear on sex-buyer review boards. CSA descriptor match is trigger-level. After-hours transactions spike without a payroll increase are likely inconsistent with legitimate staffing.

ACTION, SAME-DAY ESCALATION. ROUTE TO EXPLOITATION-AWARE QUEUE. APPLY 3-OF-5.

SCENARIO · LABOR · CONSTRUCTION

Subcontractor, COR-03, 8 mo pre-WC

Construction subcontractor in COR-03 ZIP. Payroll processed through **check-cashers**. Activity surging 8 months before WC. Sunbiz shows incorporation **10 months ago, same registered agent** as two dissolved entities.

Why this is not normal event commerce:

Legitimate construction firms use banking payroll, not check-cashers. Phoenixing (rapid incorporation / dissolution under related agents) indicates evasion. Pre-event timing matches construction labor demand cycle.

ACTION, FLAG, MAP SUBCONTRACTING CHAIN, DOL CROSS-REF, CHECK SHARED IDENTIFIERS.

STAGE 03. DETECT

PAGES 12–17

CONDITIONS, SEX, LABOR, CONVERGENCE

03

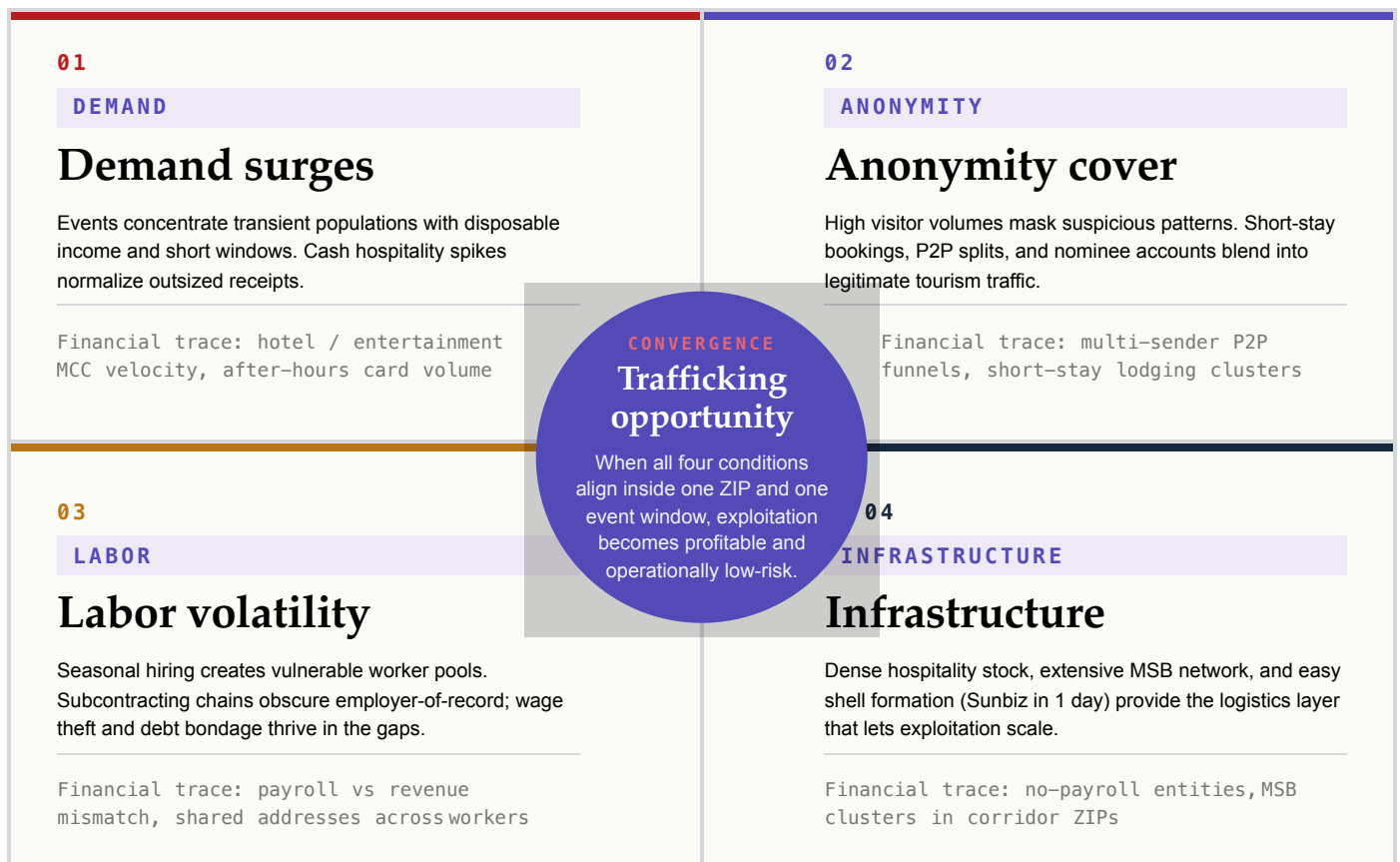
Detect.

FOR ANALYSTS

Your monitoring is now configured. When alerts fire, you need to know what you are looking at, the specific indicators, business models, cases and red flags.

HOW TO READ DETECT

The four conditions → three sex trafficking business models + three labor trafficking models → consolidated indicator tables (21 sex, 20 labor) with strength ratings 1-4 → the persona network map that ties them all together.



Strength-rating key.

4 TRIGGER Escalate same-day. Open investigation.	3 CORROBORATE Add to case. Escalate if 2+ with a trigger.	2 SUPPORT Flag in Elevated / Heightened postures.	1 CONTEXT Note only. Not standalone basis.
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Sex trafficking in South Florida.

Three business models drive 90% of what you'll see. The indicators make sense only in the context of how these models actually work.

Illicit massage businesses IMB · YEAR-ROUND	Hotel & venue-based CIRCUIT · PRE-EVENT	Residential brothels YEAR-ROUND
Broward Co.: highest IMB concentration nationally. Strip-mall ops. Victims CN, KR, VE, CO. Supply-side setup 3-6m pre-event. Signature: revenue vs therapist count, Sunbiz multi-entity, East-Asia wires via personal accounts, casino cash-outs linked to spas.	Circuit patterns across FL cities. CSA ads ramp up pre-event. Buyers pay via P2P. Signature: short-stay hotel + CSA from same acct, multi-state P2P inflows, no employment income but consistent ride-share / personal-care spend around event dates.	Converted residential properties. Complicit landlords accept cash rent. Signature: rent from front businesses, multiple properties one name without occupancy, cash-intensive operation.

Key cases.

CASE	OUTCOME	FINANCIAL INDICATORS
Session (SDFL, Jan 25)	Life + \$327K rest.	Sex / labor convergence, migrant-worker trailers nr. orange groves (COR-08)
Foster (SDFL, Sep 22)	60 yr + \$14.2M	\$14M+ laundered, bank-fraud co-conspirators, 20-yr SoFlo entertainment exploitation
Tren de Aragua (Apr 25)	27 charged	Debt-bondage structure, P2P payments, TCO targeting event-heavy cities

Consolidated red flag indicators · sex trafficking.

UID	INDICATOR	STR	DATA NEEDED	EVENTS
418	Customer details in sex-trafficking adverse media	4	CDD + Sex AM feed	All events
419	Customer details in sex-trafficking OSINT	4	CDD + Sex OSINT	All events
17	Business details in adult / CSA advertisements	4	CDD + CSA sites	Pre / during
346	Business on sex-buyer review board	4	CDD + review-board data	All events
SFL-04 SFL	IMB revenue inconsistent with DBPR therapist count	4	DBPR + revenue data	Year-round
SFL-05 SFL	Multiple massage establishments, connected owners (Sunbiz)	3	Sunbiz + DBPR + linkage	Year-round
348	Frequent payments to CSA sites	3	Txn + CSA descriptors	Pre-event ramp
345	Business website / ads contain sexualized content	3	CDD + CSA sites	All events
292	Excessive beauty / personal-care spend vs. business type	3	Transaction data	All events
432	Counterparties in sex-trafficking adverse media	3	Txn + AM feed	All events
SFL-01 SFL	P2P clusters (\$100–500), multi-senders, unusual hours, event dates	3	P2P data + calendar	All major
SFL-02 SFL	Hotel / STR bookings + CSA payments near corridors	3	MCC + CSA descriptors	Pre / during
SFL-06 SFL	Casino cash-outs linked to massage / spa accounts	3	Casino + linkage	Year-round
SFL-07 SFL	Wires from IMBs to CN / KR / TH / VN via personal accounts	3	Wire data + country	Year-round
46	Double-charge patterns (same card, same day)	2	Transaction data	All events
107	Business transactions at unusual hours (10pm–6am)	2	Transaction data	Event weekends
60	Low / no payroll relative to revenue	2	Transaction data	Year-round
SFL-08 SFL	Multi-state payers + short-stay hotel near event venues	2	Customer data + MCC	All major
SFL-10 SFL	Nightclub cash deposits exceeding revenue during event weekends	2	Cash + revenue data	All major
33	Same owner, multiple businesses, same corridor	1	CDD + Sunbiz	Year-round

WHEN A TRIGGER FIRES: open the investigation workflow (p. 17). Begin at Step 1. Check corroborating flags to build the case. The persona network map (p. 14) shows how actors behind these indicators connect, helping identify related accounts.

Labor trafficking in South Florida.

Sex spikes DURING events; labor spikes BEFORE (construction, staffing, event services). Agriculture follows harvests. Labor trafficking is harder to detect. Transactions look legitimate. Exploitation hides in what is missing: adequate wages, taxes, proper employment.

Agriculture COR-08 · IMM. Immokalee. Tomatoes, citrus, sugarcane. H-2A visa fraud, passport confiscation, debt bondage via inflated fees. Signature: payroll below minimum wage for H-2A count, cash withdrawals, dormitory rent exceeding worker payroll.	Construction PRE-EVENT Venue construction pre-event. Subcontracting chains obscure exploitation: prime → sub → broker → worker. Signature: MSB / check-casher payroll, rapid Sunbiz incorp. + dissolution, tax inconsistent with the workforce.	Hospitality staffing TOURISM YR Operation RoomKey pattern. Shell staffing cos; \$25M+ tax evasion, \$11M+ laundered; Key West → Miami. Signature: tax inconsistent with payroll, nominee structures, multi-entity networks.
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Subcontracting chain · visibility cascade.

Prime contractor bank payroll, tax-compliant	100%
Subcontractor mixed banking, invoice flow	70%
Labor broker MSBs, cash, phoenixed shells	25%
Worker cash / P2P, shared address	<5%

Note. Detection points appear where visibility breaks: MSB / check-casher payroll, phoenixing, shared identifiers across worker accounts.

Key cases.

CASE	OUTCOME
Op. RoomKey SDFL '22–25	Up to 24 yr, shell staffing cos, \$25M+ tax evasion, \$11M+ laundered, nominees
LVH / Moreno MDFL Dec '22	118 mo, false visa apps, inflated fees, payroll fraud
Op. Blooming Onion natl Feb '25	54-count, \$200M+, laundered via real estate, casino, vehicles
Kingdom of God Global FL nexus, Feb '26	3 leaders, call-center forced labor, \$50M donations, Tampa mansion raid

Consolidated red flag indicators · labor trafficking.

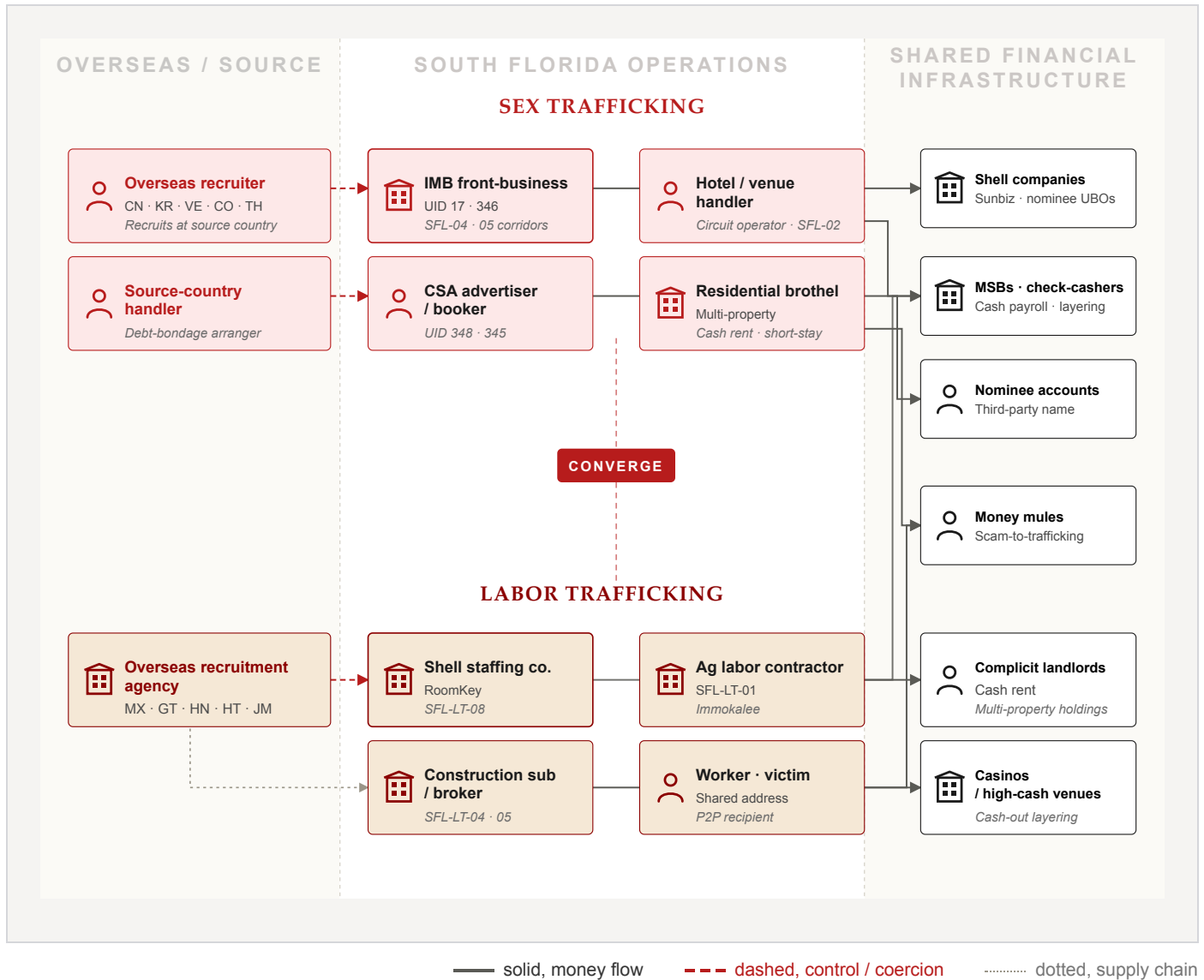
UID	INDICATOR	STR	DATA NEEDED	EVENTS
420	Customer details in labor-trafficking adverse media	4	CDD + Labor AM feed	All + harvest
421	Customer details in labor-trafficking OSINT	4	CDD + Labor OSINT	All + harvest
15	Employment entity in adverse media	4	CDD + AM feed	All + harvest
441	Employment entity in OSINT	4	CDD + Labor OSINT	All + harvest
SFL-LT-08 SFL	Hospitality staffing tax inconsistent with payroll (RoomKey pattern)	4	Payroll + tax data	Tourism / events
125	Transacting with entities under DOL / OSHA violation	3	Txn + DOL data	All + harvest
257	Payments to overseas recruitment agencies	3	Txn + countries	Pre-harvest / event
277	Airline bookings from high-risk labor countries	3	Txn + airlines	Pre-harvest / event
430	Related entities in labor-trafficking adverse media	3	Txn + Labor AM	All + harvest
SFL-LT-01 SFL	Farm payroll below min-wage for H-2A numbers	3	H-2A data + payroll	Harvest Nov–Jun
SFL-LT-04 SFL	Construction sub using MSBs for payroll, pre-event	3	MSB + calendar	Pre-event 6–18 mo
SFL-LT-05 SFL	Phoenixing via Sunbiz	3	Sunbiz + account dates	Year-round
58	Payroll per worker below minimum wage	2	Transaction data	Harvest; events
250	Rapid cash withdrawal post-wage deposit	2	Transaction data	Year-round
283	Multi-property rent from single account (worker housing)	2	Transaction data	Year-round
59	No employment tax despite active payroll	2	Transaction data	Year-round
SFL-LT-09 SFL	Bail bond / attorney payments near DOL enforcement dates	2	MCC + DOL records	Post-enforcement
183	Business premises inaccessible	2	Staff observation	Year-round

WHEN A TRIGGER FIRES: open the investigation workflow. Pay particular attention to **Step 3 OSINT**. Enforcement databases (DOL, OSHA) and Sunbiz filing histories will either corroborate or dispel the concern.

Eight personas. One ecosystem. Same money flows.

Persona network map.

One combined view: in South Florida, sex and labor trafficking share the same corridors, laundering mechanisms, and often the same facilitators. Position your subject. For each adjacent persona, check its indicators and expand the network picture.



HOW TO USE DURING AN INVESTIGATION: position your subject on the map. For each adjacent persona, check the corresponding indicators. A front-business owner → handler → money-mule network strengthens the case and broadens the SAR narrative. Cross-institution via FinCEN 314(b).

Sex trafficking band

IMB owners, hotel handlers, CSA advertisers, landlords

Labor trafficking band

Shell staffing cos., ag contractors, construction subs, worker-victims

Shared infrastructure

Both trafficking types run through the same shells, MSBs, nominees, mules

What each actor looks like inside your data.

Persona detail · what each actor looks like in your data.

The eight personas from the map on the previous page, deepened. Each card lists the expected financial footprint and the top red flags ranked by strength. Use during triage to check whether an alerting customer matches one of these profiles.

P-01 · SEX · PRIMARY

IMB front-business owner

FOOTPRINT

Revenue misaligned with DBPR-licensed therapist count. Cash-heavy deposits. Sunbiz shows same UBO across 3+ massage entities. East-Asia wires via personal accounts. Casino cash-outs linked to spa receipts.

TOP RED FLAGS

- 4 UID 17, CSA match
- 4 UID 346, review board
- 4 SFL-04, rev vs DBPR
- 3 SFL-05, multi-entity

P-02 · SEX · CIRCUIT

Hotel & venue-based handler

FOOTPRINT

Rotates across FL event cities. CSA advertising spend ramps 2–6 weeks pre-event. Hotel + STR from same account. No employment income yet consistent mid-income spend, funded by inbound P2P from multi-state payers.

TOP RED FLAGS

- 4 UID 418, AM match
- 3 UID 348, CSA payments
- 3 SFL-01, P2P + event
- 3 SFL-02, hotel + CSA

P-03 · SEX · DIGITAL

CSA advertiser / booker

FOOTPRINT

Outbound card payments to CSA platforms and hosting services. Sexualized descriptors in business websites. Double-charge patterns MCC 7297, 7298. Inbound P2P from diverse geographies, memos often map to ad post codes.

TOP RED FLAGS

- 3 UID 348, CSA payments
- 3 UID 345, sexualized ads
- 2 UID 46, double-charges
- 2 UID 107, 10pm–6am

P-04 · SEX · FACILITATOR

Residential brothel landlord

FOOTPRINT

Multiple residential properties in one name. Rent arrives from LLC fronts or cash, not tenant names. Short-stay occupancy. Utilities high vs declared occupancy. Inbound P2P from unrelated parties.

TOP RED FLAGS

- 3 Rent from LLC fronts
- 3 Multi-property, no occ.
- 2 Weekend cash deposits
- 2 Shared address with IMB

P-05 · LABOR · PRIMARY

Shell staffing company

FOOTPRINT

Operation RoomKey pattern. Payroll inconsistent with filed tax. Nominee UBOs. Workers lack individual accounts, paid via check-cashers. Multi-entity clusters with rapid Sunbiz phoenixing.

TOP RED FLAGS

- 4 UID 15, AM match
- 4 SFL-LT-08, tax ≠ payroll
- 3 SFL-LT-05, MSB payroll
- 3 SFL-LT-07, nominees

P-06 · LABOR · AGRICULTURAL

Agricultural labor contractor

FOOTPRINT

Immokalee & SW-FL corridor. Per-worker payroll below H-2A minimum wage. Large cash withdrawals tracking harvest. Dormitory rent exceeds worker payroll. Inflated recruitment fees wired to source countries.

TOP RED FLAGS

- 4 UID 420, AM match
- 4 SFL-LT-01, sub-min wage
- 3 SFL-LT-02, cash + harvest
- 3 SFL-LT-03, dorm rent

P-07 · LABOR · CONSTRUCTION

Construction subcontractor / broker

FOOTPRINT

Pre-event venue construction. Prime → sub → broker → worker chain obscures exploitation. Recent Sunbiz incorporation + related dissolved entities (phoenixing). Payroll via check-cashers. Tax inconsistent with declared workforce.

TOP RED FLAGS

- 4 SFL-LT-04, phoenixing
- 3 SFL-LT-05, MSB payroll
- 3 SFL-LT-06, tax anomaly
- 2 Shared agent, multi-co.

P-08 · SHARED INFRASTRUCTURE

MSBs, nominees, shells, mules

FOOTPRINT

Both trafficking types run through the same rails. Shell companies with phoenixing; MSBs / check-cashers processing payroll or layering; nominee accounts holding assets; money mules bridging scam-to-trafficking proceeds; complicit landlords; casino cash-outs.

TOP RED FLAGS

- 3 Shared identifiers
- 3 Rapid phoenix entities
- 2 Nominee address clusters
- 2 Casino cash-out linkage

HOW TO USE THESE CARDS DURING TRIAGE

When an alert fires, match the subject to one persona card, then walk outward to adjacent personas on the previous map. A construction sub (P, 07) typically shares infrastructure with shell staffing (P, 05) and MSB rails (P, 08). An IMB owner (P, 01) typically connects to a hotel handler (P, 02) and CSA advertiser (P, 03). Cross-institution enrichment via **FinCEN 314(b)**.

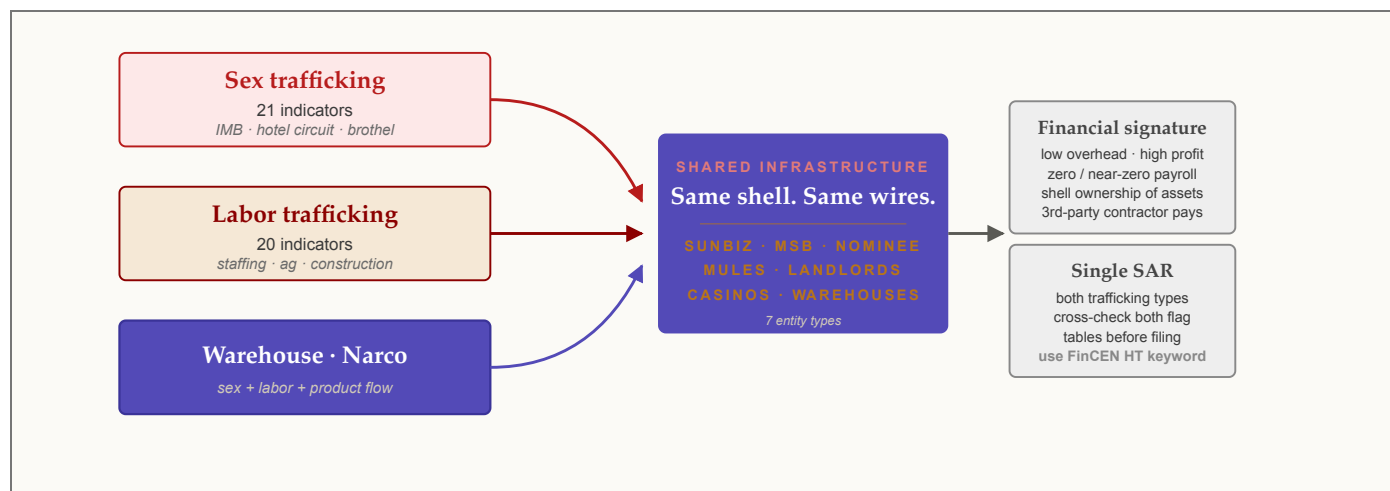
Sex and labor share infrastructure. Always cross-check.

Where sex & labor trafficking converge.

The personas on the previous page do not operate in isolation. In South Florida, the same entities, accounts, and facilitators serve both trafficking types, often within a single investigation.

IMBs ARE THE PRIMARY CONVERGENCE POINT

Workers may be recruited under a labor framing and subsequently coerced into commercial sex. The same infrastructure (shells, MSBs, nominees, mules, complicit landlords) serves both operations within the same entity. **Indicators from both flag tables may appear in the same account.**



Shared infrastructure & how it serves both.

SHARED INFRASTRUCTURE	HOW IT SERVES BOTH TYPES	WHAT TO WATCH FOR IN THE ACCOUNT
Shell companies Sunbiz-registered	Payroll outflows (labor) + rent/wire transfers (sex). Often dissolved & re-formed (phoenixing).	Newly formed entity (< 6 mo), same registered agent across multiple LLCs, dissolved predecessor at same address.
MSBs, check-cashers	Cash-based payroll (labor) + proceeds layering (sex). Third-party cash conversion.	Regular MSB activity with no corresponding bank payroll; structured deposits under \$10K.
Nominee accounts	Assets held in third-party's name on behalf of trafficker. Breaks account–activity linkage.	Accounts in elderly / low-income / unrelated names with activity profile inconsistent with stated occupation.
Money mules	Pass-through accounts. Sometimes recruited via job-scam vectors (scam-to-trafficking bridge).	Pass-through rapid in/out, structured cash-out, P2P to unknown parties, no spending.
Complicit landlords	Housing for victims (labor) or operational venues (sex). Cash rent. Multiple properties.	Multi-property owners receiving cash rent, residential addresses shared by 5+ unrelated wage earners.
Casinos, high-cash venues	Cash-out layering for both operations.	Recurring CTR activity by a non-gamer profile; chip-buy / chip-cash with no table play.
Warehouse / logistics	Co-located sex + labor + narco logistics. Shell-owned premises & vehicles, on-site labor, 3rd-party contractor deliveries (no employment record).	Low overhead / high profit; zero or near-zero payroll; shell ownership of assets; recurring 1099 / wire payouts to logistics LLCs sharing one registered agent.

CROSS-MODALITY RULE

Opened as sex trafficking? Still check labor indicators (shared housing, low payroll, shell staffing). Opened as labor? Still check CSA ads, matches, after-hours revenue. The same SAR can carry both, plus Narco if the warehouse pattern is present.

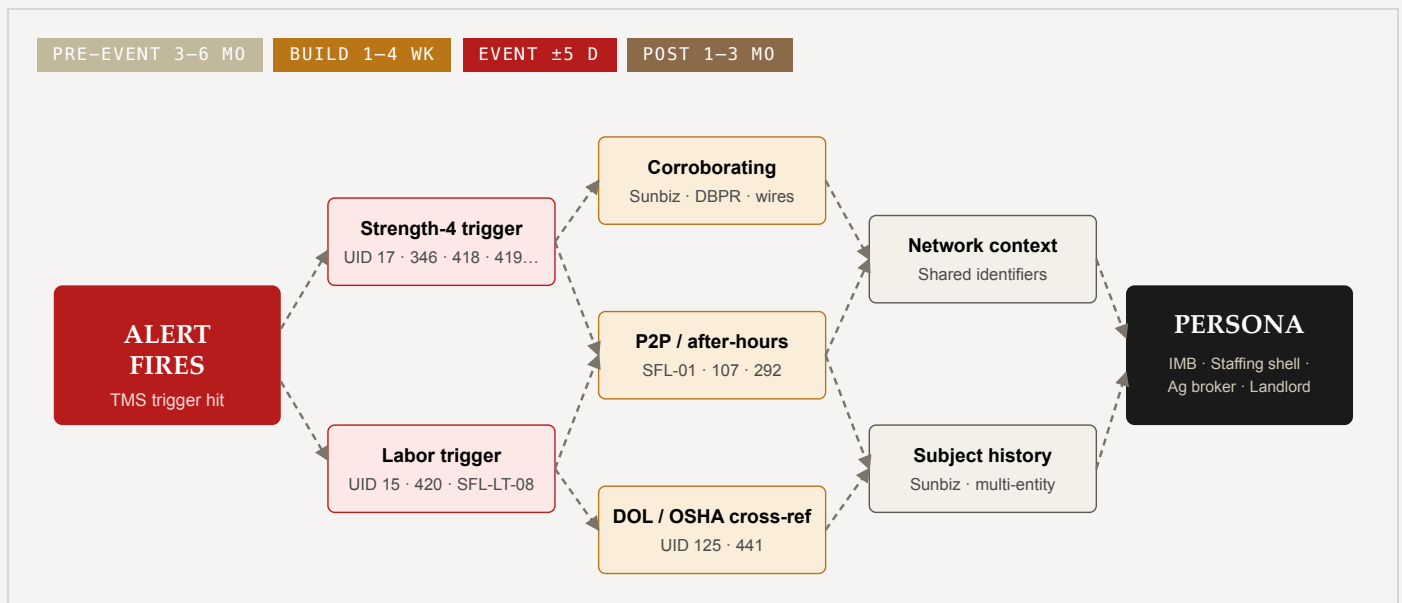
Pre-built indicator bundles, one per event type.

Top indicator bundles by event type.

Rather than cross-referencing the overlay table with the flag tables yourself, start here. Each bundle contains the top indicators for a given event family.

F1 / World Cup MAY–JUL Hospitality staffing anomalies SFL–LT–08 Lodging surges in Heightened corridors SFL–02 Ride-share clustering + after-hours 107 IMB revenue spike pre-event SFL–04 P2P multi-sender funnels SFL–01 Construction payroll via MSBs SFL–LT–04	Spring break FEB–APR Minors-risk P2P patterns SFL–01 Hotel churn COR-02, COR-10 SFL–02 Nightclub cash deposits SFL–10 After-hours transaction clustering 107 CSA ads ramp 17, 348 Multi-state payers SFL–08	Harvest OCT–JUN H-2A payroll below min-wage SFL–LT–01 Worker housing rent anomalies 283 MSB / check-casher payroll SFL–LT–04 Recruitment agency wires 257 DOL / OSHA cross-reference 125 Airline bookings from high-risk labor countries 277	Cruise / Port YEAR–ROUND Port-adjacent IMB activity COR-11 SFL–02 Port services labor exploitation SFL–LT–05 Transient customer P2P SFL–01 Hotel / STR clusters near terminals SFL–02 Multi-entity staffing 33 Wires to labor source countries 257
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Investigation pathway · alert to persona.



FORWARD BRIDGE · TO INVESTIGATE

You now have the full detection picture: business models, indicators, actor relationships, and shared infrastructure. When you get an alert, the **INVESTIGATE** section (p. 17) provides the workflow for turning detection into an actionable case.

Five steps. Three out of five evidence thresholds to escalate.

04

From alert to SAR · five-step workflow.

A sex-trafficking trigger requires a same-day response. Labor triggers require methodical OSINT. Both need disciplined documentation.

1 CONFIRM TRIGGER Verify the strength-4 indicator. Screen-capture the data pack match. Record UID, timestamp, analyst. SAME-DAY	2 PULL CORROBORATION Query internal: 90-day txn history, CDD, related accounts, counterparty network. Flag all strength-2 / 3 hits. 24 HOURS	3 RUN OSINT Sunbiz, DBPR, DOL WHD, OSHA, county property, review boards, CSA platforms, adverse media. Document each check. 48 HOURS	4 APPLY 3-OF-5 Test against 3-of-5 framework (below). If threshold met, open SAR. If close but not met, continue enhanced monitoring. 72 HOURS	5 DOCUMENT & ESCALATE SAR draft, supervisory review, 314(b) peer-bank check, law-enforcement contact if warranted. DAY 5-7
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The 3-of-5 framework.

Escalate when indicators are present across at least three of these five categories. This is the disciplined alternative to counting flags.

#	CATEGORY	WHAT IT MEANS
1	Front business	Business type used as cover (IMB, staffing shell, construction sub, ag contractor).
2	Multi-sender / multi-source funnel	Revenue from many unrelated payers; wages to workers from unusual sources.
3	Infrastructure indicator	Shell pattern, MSB, nominee, cash-intensity without justification.
4	Corridor / event context	Activity in Heightened / Elevated corridor during event window or pre-event ramp.
5	Ad / online / external signal	CSA / review-board match, adverse media, violation, OSINT hit.

THRESHOLD MET · EXAMPLE

IMB owner (cat 1) + multi-state card payers (cat 2) + wires via personal account to CN (cat 3) + COR-02 pre-Art-Basel (cat 4) + review-board match (cat 5) = 5 of 5, escalate.

What NOT to do.

- ✗ **Do not contact the subject directly.** No "welfare check" calls. No account-closure notices referencing the underlying concern.
- ✗ **Do not alert front-line branch staff.** Tipping off creates safety risk for victims and destroys the investigation.
- ✗ **Do not disclose SAR filing.** 31 USC § 5318(g)(2) prohibition is absolute, even to the customer's legal representative.
- ✗ **Do not close the account pre-emptively.** Premature termination can destroy evidence and tip the subject. Escalate first.
- ✗ **Do not rely on a single indicator.** FinCEN: no single red flag alone is determinative. Apply 3-of-5. Document corroboration.

USE 314(B). CORRECTLY

The 31 CFR § 1010.540 safe harbour lets institutions share information for trafficking investigations. Confirm registration is current. Record the information request. Keep the exchange narrowly scoped.

The SAR fields that get acted on. Call the right LE.

05

SAR skeleton · human trafficking.

The investigation brought you to escalation. SAR quality determines whether law enforcement can act.

HUMAN TRAFFICKING SAR FIELD-BY-FIELD		FIN-2020-A00 FIN-2025-NTC2 FIN-2026-NTC1
Field 2 · Filing Institution Note	HUMAN TRAFFICKING FIN-2020-A008 FIN-2026-HTWORLD CUP (and FIN-2025-NTC2 if convergence or scam-to-trafficking)	
Field 38 · Suspicious Activity Category	Check (h) Human trafficking . Also check any of (a)–(z) that apply: money laundering, structuring, fraud.	
Narrative · Para. 1 Why	Lead with trigger indicator (UID + strength). One sentence: "This SAR is filed in connection with suspected [sex / labor / convergence] trafficking by [subject type] operating in [corridor] during [event period]."	
Narrative · Para. 2 Subject	Identification, Sunbiz details, DBPR licensure, corporate history, registered agent cross-references.	
Narrative · Para. 3 Event context	EDRM posture for the corridor, specific event(s), phase (pre / build / event / post), dates.	
Narrative · Para. 4 Trigger	Each strength-4 indicator: UID, source, description, date observed .	
Narrative · Para. 5 Corroborating	Strength-2 / 3 indicators, same structure, grouped by theme (financial / OSINT / CDD).	
Narrative · Para. 6 Network	Connected entities, shared registered agents, nominees, counterparties, 314(b) responses if any.	
Narrative · Para. 7 3-of-5	List which of the five categories are present and why.	
Narrative · Para. 8 Exclude lookalikes	"Why this is not normal event commerce." Address the specific legitimate look-alike patterns this customer does NOT match.	
Attachments	Sunbiz printouts, DBPR records, data pack match screenshots, counterparty account summaries, corridor / event calendar extract.	

KEY CONTACTS

FinCEN

Human Trafficking. FIN-2020-A008
Nomad scams. FIN-2025-NTC2
E-filing: bsaeefiling.fincen.treas.gov

FBI. Miami Field Office

Human Trafficking Task Force
tips.fbi.gov, 1-800-CALL-FBI

HSI. Miami SAC

Homeland Security Investigations
Tip line 1-866-347-2423

DOL WHD. Florida

Labor trafficking / H-2A
Miami district, Jacksonville

FL Office of Attorney General

Statewide Human Trafficking Council
Hotline 1-888-347-3423

National Human Trafficking Hotline

1-888-373-7888, text BeFree 233733

REQUIRED KEYWORDS

HUMAN TRAFFICKING

FIN-2026-HTWORLD CUP

CONVERGENCE (if sex + labor)

EVENT-DRIVEN (if linked to specific event)

CORRIDOR-[ID] (e.g. CORRIDOR-02)

BACKWARD BRIDGE

The investigation brought you to escalation. A well-structured SAR, cross-referenced with FinCEN advisories and written with external corroboration, is what determines whether law enforcement can act on the intelligence you have just produced.

Quarterly cadence. Pre-event checklist. Post-event review.

06

Institutional preparedness · closing the loop.

— This is not one-off training. It is an annual cadence tied to the South Florida event calendar.

Annual cadence.

ACTIVITY	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Analyst baseline training	Q1 ALL-						Q3 REFR					
Pre-event briefing			ULTRA	F1	WORLD CUP						ART BAS	
Scenario cards / tabletop		FEB			MAY				SEP		NOV	
EDRM re-score	JAN				MAY					OCT		
Post-event review						F1 DEBR		WC DEBR				BASEL
LE liaison sync		Q1			Q2			Q3			Q4	

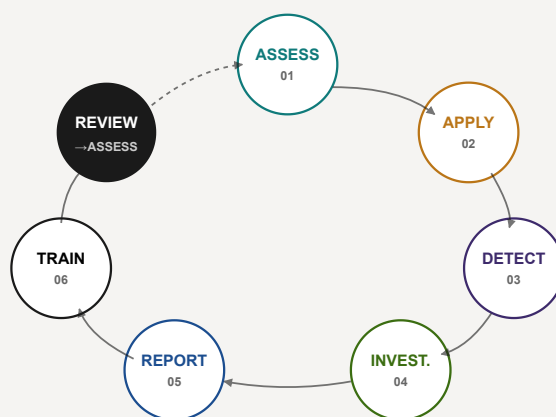
Six-week pre-event checklist.

W-6	☐ Re-score EDRM for affected corridors. Lock postures for event window.
W-5	☐ Activate event-specific data pack filters. Verify subscriptions current.
W-4	☐ Pre-event briefing to BSA / AML team. Walk through relevant scenario cards.
W-3	☐ Configure event-specific queue in TMS. Tag alerts with event identifier.
W-2	☐ Confirm 314(b) channels with peer institutions in affected corridors.
W-1	☐ LE liaison sync. Confirm SAR routing + after-hours contact.
EVENT	☐ Heightened posture live. Dedicated queue, accelerated triage, daily supervisor check.
W+2	☐ Post-event maintain enhanced monitoring for 1–3 months (laundering tail).
W+6	☐ Post-event review. What alerted? What should have? Feed into next ASSESS.

Post-event review.

FIVE REVIEW QUESTIONS · EVERY EVENT

1. Which UIDs alerted? Which did not, and should have?
2. Were corridor postures set correctly pre-event?
3. Did lookalike filters produce acceptable false-positive rates?
4. Which indicator bundles were most productive?
5. What goes into the next EDRM re-score?



Note. Post-event review feeds back into the next ASSESS. Each pass refines detection.

● ASSESS — ● APPLY — ● DETECT — ● INVESTIGATE — ● REPORT — ● TRAIN

Two weeks before. Two days after. Every event.

Data packs that unlock the full framework.

Ten internal-only indicators are available out of the box (p. 4). Unlocking the remaining 93 requires the five external data packs below. Each pack is independently deployable. **If you implement one pack, start with the Event Atlas.**

START HERE Event atlas Calendar, corridors, EDM rubric Complete SoFlo event calendar + corridor definitions + EDM scoring rubric. Unlocks every corridor filter and event window in this guide. The single highest-leverage pack. UNLOCKS: CORRIDOR + EVENT LOGIC, ~15 UIDS, EDM AUTO-SCORING	HIGH-IMPACT Sex trafficking OSINT CSA, review boards, adverse media Commercial sex advertisement descriptors, review-board listings, sex-trafficking adverse media feed. Turns strength-4 triggers from theory into alerts. UNLOCKS: UID 17, 346, 348, 418, 419, 345, 432	HIGH-IMPACT Labor trafficking OSINT DOL WHD, OSHA, H-2A, adverse media Labor adverse media + DOL WHD enforcement data + OSHA citations + H-2A disclosure data. Required for labor trafficking triggers. UNLOCKS: UID 15, 420, 421, 125, 441, 430, SFL-LT-01	NETWORK Corporate registry Sunbiz, DBPR, state filings Florida Sunbiz + DBPR licensure integration. Enables Sunbiz phoenix detection, multi-entity ownership mapping, and licence-vs-revenue checks. UNLOCKS: SFL-04, SFL-05, SFL-LT-05, UID 33	ENHANCEMENT High-risk locations Venues, hotels, STR, ports Geolocation reference data for hotels, STR clusters, nightclubs, massage salons, cruise terminals, and event venues. Improves geographic alerting. UNLOCKS: SFL-02, SFL-08, GEO-FILTERING
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RECOMMENDED DEPLOYMENT SEQUENCE

1. Event atlas
2. Sex trafficking OSINT (if IMB exposure) or Labor OSINT (if agricultural / construction / hospitality exposure)
3. Corporate registry
4. Remaining OSINT pack
5. High-risk locations.

Note. Each step compounds on prior packs. You do not need all five to begin; you need the first one.

The data packs and statutes that make this guide deployable.

Sources & authorities.

SELECTED · FULL LIBRARY IN DIGITAL COMPANION

FEDERAL ADVISORIES & GUIDANCE

- 01 [FinCEN, Supplemental Advisory on Human Trafficking](#)
FIN-2020-A008
- 02 [FinCEN, Notice on HT during 2026 FIFA World Cup](#)
FIN-2026-NTC1 (May 11, 2026)
- 03 [FinCEN, Notice on Scam-to-Trafficking Pipelines](#)
FIN-2025-NTC2
- 04 [FinCEN, 314\(b\) Fact Sheet](#)
31 CFR § 1010.540
- 05 [U.S. Dept. of State, Trafficking in Persons Report](#)
TIP 2025
- 06 [OFAC, Human Trafficking Sanctions guidance](#)
- 07 [DOJ, National Strategy to Combat Human Trafficking](#)
- 08 [DOL WHD, enforcedata.dol.gov](#)
- 09 [OSHA, citation history data](#)

SDFL / MDFL CASES

- 14 [U.S. v. Session](#)
SDFL, Jan 2025, life + \$327,735 restitution
- 15 [U.S. v. Paradise Choice LLC et al. \("RoomKey"\)](#)
SDFL, 2022-25, up to 24 yr
- 16 [U.S. v. LVH / Moreno](#)
MDFL, Dec 2022, 118 mo
- 17 [U.S. v. Foster](#)
SDFL, Sep 2022, 60 yr, \$14.2M restitution
- 18 [U.S. v. Tren de Aragua \(indictment\)](#)
Multi-district, Apr 2025, 27 charged
- 19 [Operation Blooming Onion](#)
SD Georgia, Feb 2025, 54-count, \$200M+
- 20 [Kingdom of God Global Church](#)
EDMI, Feb 2026, 3 leaders charged

METHODOLOGY

Indicators in this guide derive from the **RedFlag Accelerator master library**, 400+ source documents, 10+ years of methodology development. Fifteen indicators (prefixed SFL- / SFL-LT-) are original to South Florida.

Strength ratings 1-4 are assigned via a standard rubric weighing: historical conviction correlation, source defensibility, false-positive rate in tested deployments, operational actionability.

External review against 16 metrics yielded a score of **71 / 75**, compared to **40 / 75** for the next-best global comparable.

CAVEATS & LIMITATIONS

USF TIP Lab victim estimates are **modelled**, not case counts. All indicators are probabilistic; no single flag is determinative. FinCEN guidance on contextual evaluation applies.

This handout is a summary of the full practitioner guide; the digital companion contains complete source references, financial flow reconstructions, training scenarios, and SAR narratives.

RESEARCH & DATA

- 09 [USF TIP Lab, Florida Human Trafficking Data Compendium](#)
2024, modelled estimates, not counts
- 10 [Polaris, Analysis of Labor Trafficking Cases](#)
2020-24
- 11 [FL Office of AG, Statewide Council Annual Report](#)
2025
- 12 [FL DCF, trafficking screening data](#)
- 13 [University of Miami, Miami-Dade Trafficking Indicators](#)

LAWS & STATUTES

- 21 [Trafficking Victims Protection Act](#)
22 USC § 7102 et seq.
- 22 [Forced labor, sex trafficking](#)
18 USC §§ 1589-1595
- 23 [Bank Secrecy Act](#)
31 USC § 5311 et seq.
- 24 [SAR disclosure prohibition](#)
31 USC § 5318(g)(2)
- 25 [Florida Statutes Chapter 787](#)
Human trafficking

DIGITAL COMPANION

Full practitioner guide, data packs, training cards, and SAR narratives at redflagaccelerator.com

At-a-glance · pin this page.

ABBREVIATIONS

BSA/AML	Bank Secrecy Act, Anti-Money Laundering
CDD	Customer Due Diligence
CSA	Commercial Sex Advertisement
DBPR	FL Dept. Business & Professional Regulation
DOL WHD	Dept. Labor, Wage & Hour Division
EDRM	Event Density Risk Model
IMB	Illicit Message Business
LE	Law Enforcement
MCC	Merchant Category Code
MSB	Money Services Business
SAR	Suspicious Activity Report
FIN-2026-NTC1	FinCEN World Cup HT Notice (May 2026)
SFL / SFL-LT	South Florida indicator prefix (sex / labor)
STR	Short-term Rental
TCO	Transnational Criminal Organization
TMS	Transaction Monitoring System
UID	Unique Indicator ID

KEY NUMBERS TO REMEMBER

3, 6, 1, 3	Event phases: pre-event 3–6 mo, build-up 1–4 wk, event ±5 d, post 1–3 mo
3/5	Escalate when indicators span ≥ 3 of the 5 structural categories
13	Defined risk corridors across Miami-Dade, Broward & Palm Beach
18–25	EDRM score range triggering Heightened posture
103	Total indicators in the full framework (15 SFL-coded)
10	Indicators deployable with internal data only (p. 4)

HIGH-RISK MCCS

7297	Massage parlours
7298	Health / beauty spas
7230	Barber / beauty shops
7011	Hotels / motels / resorts
7012	Time-shares
5813	Bars, drinking places
4722	Travel agents / tour ops
4121	Taxis / limos / ride-share
6513	Real-estate mgmt / rentals
6011 / 6051	Cash advance / MSB

ONE-LINE DECISIONS

Strength-4 trigger fires. Escalate same-day. Open workflow. Do not contact subject.

2+ corroborating indicators in Heightened corridor. Enhanced monitoring. Run OSINT.

Labor indicators + ag / construction / hospitality. Pull DOL WHD + OSHA. Sunbiz for phoenixing.

3-of-5 threshold met. SAR. Include FIN-2020-A008, FIN-2026-HTWORLD CUP, HUMAN TRAFFICKING, event period.

Convergence suspected (sex + labor). Flag both types. Persona map. Check shared infrastructure.

No strength-4 match but multiple weak signals. Baseline monitoring. Re-score at next EDRM cycle.

HOTLINES

National HT Hotline
1-888-373-7888
 HSI Tip Line
1-866-347-2423
 FBI Miami
1-800-CALL-FBI
 FL AG HT Council
1-888-347-3423



SOUTH FLORIDA EDITION



Learn more

Register for the RedFlag
Accelerator Portal

This is what operational trafficking detection looks like.

The World Cup arrives in weeks. But the risk it amplifies has been here for decades. and will be here long after the stadium goes dark.

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IN COLLABORATION WITH

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Chapter

PRACTITIONER EDITION, 2026
THIS HANDOUT IS A SUMMARY.
FULL FRAMEWORK IN THE DIGITAL COMPANION.