



SEPARATING FACT

FROM FICTION:

Do Major Sporting Events Attract Increases in
Incidents of Commercial Sex Trafficking?

ABSTRACT

The Super Bowl is the most profitable sporting event in the world, but there are concerns that this and other major sporting events attract an increased demand for commercial sex trafficking. This paper will examine this often reported correlation to determine its veracity and provide guidance to financial institutions of host cities of what to look out for.

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Introduction

The Super Bowl is the most profitable sporting event in the world with a 2016 revenue of at least \$620 million.¹ From Super Bowl ads to fan merchandise, the National Football League's siren call to the masses is that there is money to be made and spent in a Super Bowl host city. Aside from the many fans attending the game, there are other spectators that will be looking to cash in on the wave of dollars flowing into the host city with promises of carnal delights if you can afford them.

This white paper will explore the often made claim that when major sporting events come to a host city there will be a corresponding increase in incidents of commercial sex trafficking. Through literature reviews, media reports, academic research papers and interviews, this white paper intends to provide clarity to a topic where there is scant empirical evidence and an overabundance of anecdotal data. It should be noted that this paper is not designed to discuss or debate the legal, social or moral aspects of prostitution nor does it intend to conflate commercial sex trafficking of minors and adults with consensual adult prostitution. In addition, this white paper will be focusing on the human trafficking subgroup of sex trafficking and not labor trafficking.

Sex trafficking is a horrific crime that is sustained by the demand of consumers of sexual exploitation. Sex traffickers supply these consumers with a seemingly endless supply of victims with the ultimate goal of exploiting these victims for personal gain. While these traffickers grow rich from the revenue of this exploitation, the victims are left to deal with the long-term scars of their ordeals: drug and alcohol abuse, sexually transmitted diseases and mental and physical effects that can impact their interactions with family, friends and society at large. Disrupting the demand for sexual exploitation can adversely affect the ability of sex traffickers to profit from this illicit activity. Knowing how to identify sex trafficking indicators can help punish those that participate in or profit from this crime and may help someone escape a life of servitude.

Human Trafficking: A Primer

Before delving into the history of the correlation between major sporting events and commercial sex trafficking, here's a primer on the topic of human trafficking. Human trafficking, for all intents and purposes, is another name for modern day slavery. It is estimated to be the third largest international criminal industry, ranked behind illegal drug and arms trafficking according to the United Nations Office on Drugs and Crime with annual earnings estimated at \$150 billion.² \$99 billion coming from commercial sexual exploitation.³

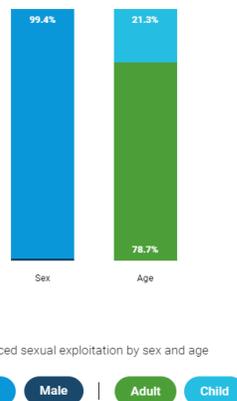
While the victims of commercial sex trafficking can be anyone, they are most often women and girls. According to a U.S. Department of Justice report, approximately 83 percent of victims in confirmed sex trafficking cases were identified as citizens of the United States.⁴ Runaways, homeless youth, foreign nationals, undocumented immigrants and refugees or individuals fleeing

conflict hot spots can be specifically vulnerable to commercial sex trafficking. Victims can be found in both legitimate and illicit erotic service industries such as massage parlors, strip clubs and escort services. In March 2017 the non-profit anti-human trafficking organization, Polaris Project, released a report identifying 25 unique categories of U.S. environments where human trafficking thrives. Of the 25 categories, Escort Services was by far the environment that was of most concern based on the number of cases documented between December 2007 and December 2016 through their phone and text contact channels.⁵

According to the 2017 Global Estimates of Modern Slavery report, there were approximately 40.3 million victims of human trafficking globally in 2016. 4.8 million of those individuals are victims of forced sexual exploitation. Approximately 99 percent of these victims are women and children, with children representing 21 percent of these victims.⁶

Forced Sexual Exploitation

At any given time in 2016, **4.8 million** people are victims of forced sexual exploitation. On average, they are held for 23.4 months in their situation before escaping or being freed. The vast majority are women and girls. Children represent more than 20% of the victims.



Forced sexual exploitation by sex and age

Female Male | Adult Child

Source: 2017 Global Estimates of Modern Slavery

In November 2000, the United Nations adopted two protocols as part of its Convention Against Transnational Organized Crime. In addition to a third protocol adopted in May 2001, they are collectively referred to as the Palermo Protocols. The first of these protocols is the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children. Under Article Three of this protocol, “trafficking in persons” is defined as “the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs”.⁷

The Trafficking Victims Protection Act of 2000 (TVPA) defines “sex trafficking” as “the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of commercial sex act.”⁸ Under the TVPA, adults and minors are treated differently under the definition of “severe forms of trafficking in persons.” A minor (i.e., a person under the age of 18)

performing a sexual act is covered under the TVPA due to the fact that a minor cannot legally give consent. While an element of force, fraud or coercion needs to be involved in order for an adult to be covered under the TVPA. The purpose of making that distinction is so to differentiate between consensual commercial adult sex work and commercialized sexual exploitation.

The practice of human smuggling is often confused with human trafficking. What sets human smuggling apart from human trafficking is that the smuggling involves transportation, either domestic or international, and doesn't necessarily involve exploitation. Although human trafficking can involve the movement of persons for purposes of exploitation, it is not required for the practice. Human smuggling is the "facilitation, transportation, attempted transportation or illegal entry of a person across an international border, in violation of one or more countries laws."⁹ Smuggling usually ends when a border has been crossed and a smuggling fee has been paid. Ultimately, those who are smuggled typically consent to be transported. In contrast, human trafficking is non-consensual and the exploitation can endure indefinitely.

Genesis of the Sports & Sex Trafficking Connection

The first instance in which a major sporting event was speculated to have an association with or be the cause of an increase in commercial sex trafficking was the 2004 Olympics in Athens, Greece.¹⁰ The concern was raised by Northern European governments criticizing the Greek government's policies on regulating prostitution. The Greek government responded by launching a series of public awareness campaigns aimed at representing their best efforts in tackling the problem of commercial sex trafficking. However, after the Olympics, there did not appear to be any instances of commercial sex trafficking linked to the Olympics. As reported by the International Organization for Migration (IOM), "...while there is paucity of post-event analysis of the issue, it can nevertheless be stated that neither the 2004 annual report on Organised Crime in Greece by the Greek Ministry of Public Order, nor the IOM Athens case data in the IOM CTM database referred to instances of trafficking for the purpose of sexual exploitation during the 2004 Olympic Games."¹¹

By the time the 2006 FIFA World Cup came to Germany, officials were estimating the potential number of sex trafficked victims that would travel to Germany at 40,000 women and children. That estimate would be proven to be unfounded as only five trafficking cases were thought to be linked to the World Cup by Germany's Federal Criminal Police Office. Yet, the 40,000 prostitutes claim gained traction among advocacy groups and with the press looking to sensationalize the World Cup. Similar claims that an increase in commercial sex trafficking would occur were also associated with the 2010 Winter Olympics in Vancouver, Canada and at the 2010 FIFA World Cup in South Africa.

Media reports covering the 2011 Super Bowl in Arlington, Texas for the first time exposed American football fans to similar claims that were levied at the 2006 FIFA World Cup. Local police with their unsupported prognostications would help fuel the fear of up to 100,000 prostitutes

and trafficked victims descending upon Arlington like a horde of zombies from an episode of *The Walking Dead*. This would ultimately lead to then Texas Attorney General and current Texas Governor, Greg Abbot, to pronounce that the Super Bowl was, “the single largest human trafficking incident in the United States.”

Future Super Bowls would have a number of eye-raising sound bites that would echo similar sentiments:

- Super Bowl XLVIII in East Rutherford, New Jersey: “We know from the past, any sports venue, especially the Super Bowl, acts as a sex trafficking magnet.” – New Jersey Congressman Chris Smith
- Super Bowl XLIX in Glendale, Arizona: “The largest human trafficking venue on the planet.” – Cindy McCain (wife of Arizona Senator John McCain)

What the Academics Had to Say

There were a number of research papers available to review that investigated the connection between major sporting events and commercial sex trafficking. The Global Alliance Against Traffic in Women (GAATW) argued in its 2011 study that that an increase in commercial sex trafficking during major sporting events was unlikely due to it being statistically unfeasible and unprofitable for commercial sex traffickers.¹² The study also doubted that event attendees would be able to afford commercial sex work and criticized the assumption that only men attended these types of events which would drive the demand for illicit sex. The study’s conclusion: “Despite massive media attention, law enforcement measures and efforts by prostitution abolitionist groups, there is no empirical evidence that trafficking for prostitution increases around large sporting events”.

In a report published in 2011, a research team from the University of Southern California examined the frequency of female escort posts on Backpage.com leading up to Super Bowl XLV.¹³ The team began the research with the hypothesis that female escort post frequency would increase in Dallas leading up to the event. The team was able to confirm their hypothesis and also determined that “the Super Bowl attracted a slightly older pool of reported ages than usual.” Unfortunately, they were unable to isolate actual cases of commercial sex trafficking from their data.

A team of researchers from Arizona State University collected data during the 2014 and 2015 Super Bowls which resulted in a number of surprising findings.¹⁴ Overall, the markets for buying and selling sex significantly increased from 2014 to 2015 in both northern New Jersey and Phoenix, Arizona. The increases were determined by measuring the increase in the volume of commercial sex ads posted on Backpage – a 57.6 percent increase in New Jersey and a 30.3 percent increase in Phoenix. A similar analysis of the 2014 Super Bowl concluded that the increase in the frequency of sex ads posted on Backpage was not significant in the time period around the Super Bowl.¹⁵

In 2016, a Carnegie Mellon University study examined whether events like the Super Bowl attracted commercial sex trafficking activity from locations outside of the host city.¹⁶ The researchers looked at what they referred to as “new-to-town” ads – ads for individuals recently arriving from somewhere else. They found that there was an increase in these sexually suggestive advertisements on websites during Super Bowl week. The increase in ads was on par with other events that correlated with notable increases in “new-to-town” ads such as the 2015 Consumer Electronics Show. However, there were more significant increases identified during Memorial Day weekend at Myrtle Beach. Although the increase in ads was temporary and went back to normal levels after the event, the study showed that Super Bowls do correlate with an increase in the number of online commercial sex ads in and near the host city.

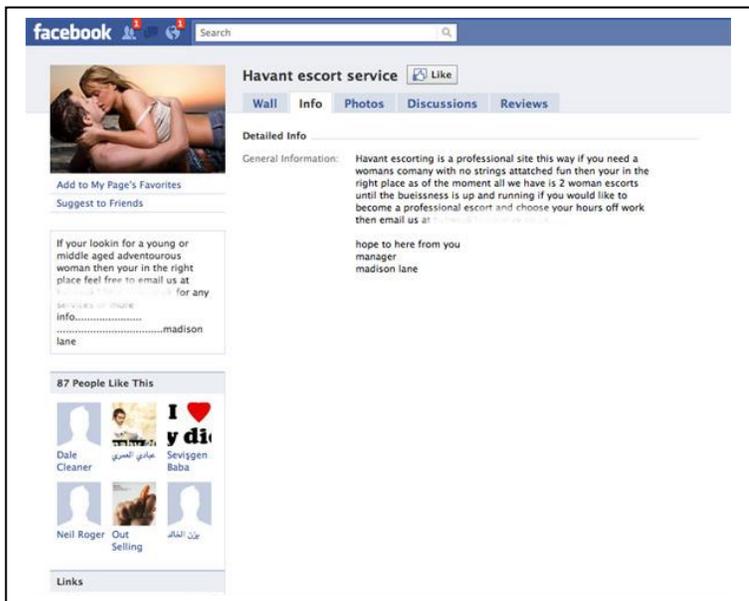
In advance of the 2018 Super Bowl in Minneapolis, a research team at the University of Minnesota analyzed the correlation between commercial sex trafficking and major sporting events around the world, most notably the Super Bowl, to determine whether these events increased the demand for sex trafficking in the host city.¹⁷ The researchers concluded that while there is some empirical evidence to support claims that the Super Bowl correlates with an increase in online ads for sex, the same can be said for other public events that draw a large audience. In addition, it did not appear that the impact on the local sex market was of a sustained duration nor did it appear that the Super Bowl had the largest impact.

In reviewing a few of the earlier studies, it was evident that they had inherent flaws due to the nature of the topic. As commercial sex trafficking is illegal and considered dangerous, researching the topic becomes incredibly difficult. It’s becomes hard to assess the true number of victims trafficked and whether those numbers increase due to the potential of increased business associated with the Super Bowl. As a large majority of commercial sex trafficking offenses go unreported, it becomes very difficult to correlate the number of commercial sex trafficking arrests with how much sex trafficking is truly being detected as the scope of the problem is unknown. Also a number of the studies relied upon online advertisements as a proxy for commercial sex trafficking and could not differentiate between consensual commercial adult sex work and commercialized sexual exploitation. The studies become more of an analysis of sex industry ads than actual commercial sex trafficking.

Leveraging the Internet and the Backpage.com Effect

The use of technology in facilitating commercial sex trafficking has elevated what was once a cliché of women standing on a seedy street corner in an ensemble courtesy of Frederick’s of Hollywood to the digital space. With just a few clicks on a laptop or mobile device, sex traffickers can solicit future victims as well as profit off of them. Knowing the tools that sex traffickers employ can help investigators navigate the darkest corners of the web to expose those who choose to sexually exploit others and those who indulge in those exploits.

The rise in the use of social media has provided teenagers a way to connect with people they may never meet and share their thoughts with an unknown global audience. Within that audience, however, are sex traffickers that are seeking to recruit unsuspecting potential victims with carefully crafted enticements offering job opportunities, romance or just a sympathetic ear. As a recruiting tool, social media sites like Facebook, Twitter and Instagram, in addition to a host of others, can

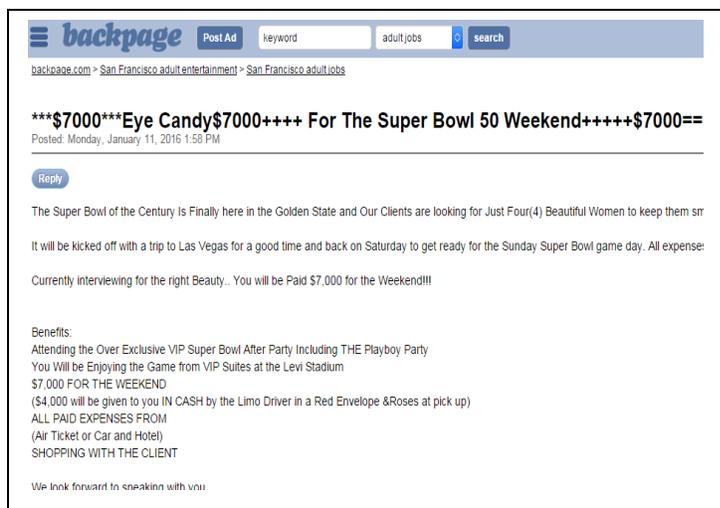


offer deceptive images of how a life of excitement and glamour awaits. Once that victim is seduced by these fabrications, a sex trafficker can use these same sites to solicit consumers of sexual exploitation. These consumers can then use these sites to view or contact the victims and determine where the next sexual encounter will occur.

The dark web also offers an opportunity for sex traffickers to sell victims with the relative anonymity and security that the deepest parts of the internet can afford. Only accessible through special software like TOR, this hidden part of the World Wide Web allows consumers of sexual exploitation to purchase sexual encounters with victims using digital currency like Bitcoin through black market sites. These black market sites offer illicit products and services such as narcotics, weapons, stolen financial data, malware and child pornography. AlphaBay, which was once considered the world's largest dark web marketplace with revenue over \$1 billion dollars over the course of three years was shut down in July 2017 by the U.S. Justice Department.¹⁸ The use of TOR and digital currencies help obscure the identities and locations of individuals using these websites.

“And today, some of the most prolific drug suppliers use what’s called the dark web —which is a collection of hidden websites that you can only access if you mask your identity and your location. And it’s called dark not just because these sites are intentionally hidden. It’s also dark because of what’s sold on many of them: illegal weapons, stolen identities, child pornography and large amounts of deadly drugs.”

- Attorney General Jeff Sessions



In terms of how sex traffickers solicit consumers of sexual exploitation, the impact of Backpage.com on commercial sex trafficking cannot be overstated. For the uninitiated, Backpage is the world's second largest classified advertising website.¹⁹ However, according to the National Center for Missing and Exploited Children (NCMEC), it is involved in 73 percent of all child trafficking reports it receives. The site also accounts for about 70 percent of

all online escort ads. In a 2016 study by San Diego State University, researchers examined adult online ads posted on Backpage.com to see whether certain keywords and phrases could be used to identify potential human trafficking. They observed that traffickers would solicit consumers for underage encounters by using certain words in their ads like "College student/girl," "barely legal," "fresh" or "new in town."²⁰ They also noticed phone numbers used in ads would show up in ads on other sites in other cities with similar photographs, which could indicate the existence of a sex trafficking ring and the movement of potential victims from one location to another.

Concerns with how Backpage's adult section ads were being used to "promote prostitution and facilitate online sex trafficking" prompted Cook County Sheriff, Tom Dart, to issue stern letters to the top executives at Visa and MasterCard. The sheriff of the second largest county in the U.S. called upon the two companies to prevent their credit cards from being used to put ads on Backpage's adult section. "Institutions such as yours have the moral, social and legal right to step up on this pervasive problem and make a fundamental and everlasting difference", Dart wrote in one his letters.²¹ By July 2015, both companies acquiesced. American Express had discontinued the practice in April of that year.

A 2017 Senate investigation report revealed that the site "maintained a practice of altering ads before publication by deleting words, phrases and images indicative of criminality, including child sex trafficking."²² Both manual and automated processes were implemented to filter out hundreds of words indicative of commercial sex trafficking or prostitution prior to the ad's publication. The practice was applied to 70-80 percent of the ads in the adult section. The goal was to sanitize the ads received of "banned terms" to minimize the difficulty in posting the ad. In an August 2, 2016 deposition, an employee responsible for editing the ads testified that management explained that "deleting ads for illegal conduct, rather than editing out the indicia of illegality, would have cut into company profits." In response to the increased pressure from the Senate investigation, an Arizona federal grand jury inquiry and a number of lawsuits, the operators of Backpage shut down its adult classified ad section in January 2017. However, a lot of those same ads ended up migrating over to their dating section.

The application of technology to the commercial sex trafficking industry provides sex traffickers a greater ability to exploit a larger number of victims without being concerned with the limitation of locality. It should be noted, however, that technology is not the root cause of trafficking, but just another avenue that helps facilitate this activity.

Operation Out of Bounds

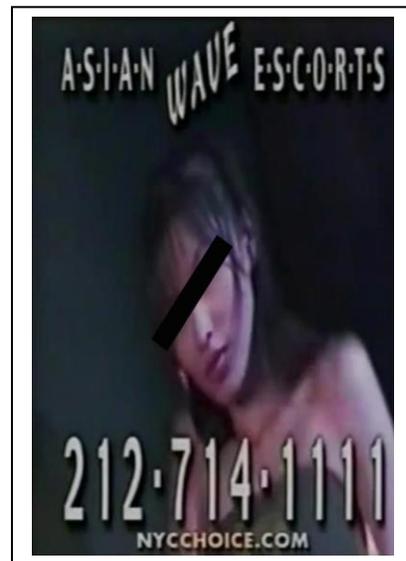
In addition to online sex ads, another potential proxy for the scope of the correlation between commercial sex trafficking and major sporting events are the arrests that are made in the time frame surrounding the Super Bowl. In the days before the 2014 Super Bowl, nearly 600 people were arrested by law enforcement stings in seventeen states. One of the more interesting cases

highlighting commercial sex trafficking during the Super Bowl also occurred in 2014. Just days before Super Bowl XLIX in East Rutherford, New Jersey, New York Attorney General Eric Schneiderman announced that 18 people had been arrested in connection with a suspected prostitution and drug trafficking organization located within a block of midtown Manhattan’s “Super Bowl Boulevard.” The arrests were made as a result of “Operation Out of Bounds”, an 11 month investigation by New York’s Organized Crime Task Force, and the New York Police Department.²³



Source: NY Daily News

The ring made millions of dollars servicing clients in Manhattan, Brooklyn, Long Island and Queens, as well as other locations in the tri-state area of New York, New Jersey and Connecticut. The suspects operated out of apartments in residential buildings. The organization promoted “party packs” of cocaine and sex to wealthy clients who were in town for Super Bowl weekend via text messages (“new sexy & beautiful girls R in town waiting for you”) and ads on public television and online.²⁴ The prostitutes, ranging in ages from 26 to 56, brought the drugs to the clients who ordered the “party packs.” After the clients were incapacitated by the drugs, the prostitutes would take turns repeatedly charging the clients’ credit card.



Source: NY Daily News

Some of these clients were charged upward of \$10,000 for one evening.

The organization laundered money and mostly credit card transactions to the tune of over \$3 million through front businesses that included a clothing wholesaler, a wig wholesaler, a beauty supply wholesaler and a limousine service. The front businesses were used to charge the credit cards for legitimate goods and services that ultimately were not provided. According to a statement by Police Commissioner William J. Bratton, the operators provided “a ‘one-stop shopping, drug and prostitution ring.” The 18 individuals were charged with conspiracy, narcotics sales, promoting prostitution and money laundering.

Although arrests like these make headlines, they also help to contribute to the widespread assumption that demands for commercial sex are exceedingly high for the Super Bowl.

Advice for Financial Institutions

Regardless of whether a financial institution is in a host city for a Super Bowl or not, identifying and reporting on incidents of commercial sex trafficking can be tough. BSA/AML personnel need to be armed with the knowledge of what to look for as far as red flags and they should consider engaging in partnerships with local law enforcement. In September 2014, the Financial Crimes Enforcement Network (FinCEN) issued FinCEN Advisory FIN-2014-A008: Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags.²⁵ This advisory provided guidance on recognizing human trafficking activity with a list a red flags. While no single transactional red flag is a definitive indicator of commercial sex trafficking-related activity, FinCEN advised that additional factors should be considered when determining whether transactions may be associated with human trafficking. They also recommended that financial institutions should consider reviewing transactions at the relationship level rather than at an account level to provide a more holistic view of the activity in question. Examples of activity that can be transactional red flags of commercial sex trafficking activity include:

- Cash deposits occurring in cities/states where the customer does not reside or conduct business, especially if the funds are quickly withdrawn after deposits are made
 - Note: FinCEN Advisory FIN-2014-A005 provides guidance on funnel accounts
- Frequent outbound wire transfers directed at high-risk geographies for human trafficking that are inconsistent with the customer’s expected activity
- Multiple unrelated customers sending wire transfers to the same beneficiary that may include similar transactional information like common address and phone number
- Numerous payments for online escort services to advertising and website hosting companies
- Unexpected transactions on a business account indicative of providing sustenance to individuals (i.e. payment for housing or lodging, regular vehicle rentals, purchases of large amounts of food)

- Payments to employment or student recruitment agencies that are not licensed/registered or that have labor violations

In addition, FinCEN indicated that observations made by branch personnel when conducting face-to-face transactions may yield invaluable information to alert the financial institution to potential human trafficking-related activity. Training for branch personnel should help them ask the right questions and being sensitive to when their gut tells them that something is up. Willful blindness to potential commercial sex trafficking can run contrary to the suspicious activity referral process of an institution's BSA program. Examples of behavior that can be observed while interacting with a customer that can be red flags of commercial sex trafficking activity include:

- Deposits are largely received in cash that appear to be inconsistent with the customer's occupation or line of business
- Evidence of a lifestyle on the account that is incommensurate with the customer's occupation or line of business
- Transactions conducted by individuals while escorted by a third party (i.e. under the pretext of needing an interpreter) to transfer funds to other countries
- A customer establishes an account or visits a branch to conduct transactions while always escorted by a third party (i.e. under the pretext of requiring an interpreter) while that third party appears to maintain possession of the customer's ID
- Common information (i.e. address, phone number, employment information) used to open multiple accounts in different names

As commercial sex trafficking is a predicate offense to money laundering, FinCEN encourages the sharing of information between financial institutions under Section 314(b) of the USA PATRIOT Act.

As mentioned previously, BSA/AML personnel should consider engaging in partnerships with local law enforcement. Law enforcement's experience and expertise with commercial sex trafficking investigations can be beneficial when researching activity on a customer's account. In addition, law enforcement have formed relationships with local advocacy groups and have gained invaluable information about how sex trafficking rings operate and how traffickers move their illicit proceeds into financial institutions from conversations with sex trafficking survivors. Project STAMP (Smugglers' and Traffickers' Assets, Monies and Proceeds) is a joint enforcement initiative between the U.S. Immigration and Customs Enforcement (ICE) and Homeland Security Investigations (HSI) aimed at going after the illicit proceeds of human trafficking organizations. In an attempt to share some of that expertise, ICE and HSI created typologies that the agencies identified in connection with their human trafficking investigations.²⁶ Some of those red flags that they identified include:

- Structuring deposits or international wires to avoid currency transaction reporting or wire record keeping requirements

- The use of credit card processing accounts with corresponding business fronts with even number charges credit to the account ranging from \$300 to \$5,000
- Structuring financial transactions at money service businesses (MSBs) under MSB reporting limits on the same day
- Multiple ATM withdrawals at the daily maximum amount

As the scope and profitability in commercial sex trafficking continues to grow, so does the money laundering risks associated with this financially-motivated crime. Commercial sex traffickers will need to turn the income derived from their victims into funds that can be used for an array of purposes. Getting this money into financial institutions is but the first step in an attempt to obscure the source of their income and in turning the funds into something that appears to be more legitimate.

The insights obtained when armed with the knowledge of what to look for as far as commercial sex trafficking can help the financial institution translate that knowledge to triggers in the institution's suspicious activity monitoring software. In addition, that knowledge can be used to inform policies and procedures that can enhance the institution's customer due diligence and enhanced due diligence programs. This will increase the financial institution's effectiveness in identifying and reporting incidents of commercial sex trafficking.

Preparing for Super Bowl LII

In February 2018, the Super Bowl comes to Minneapolis, Minnesota. It will draw thousands of visitors looking to spend money in the city while enjoying the big game and the surrounding festivities. In anticipation of the potential influx of commercial sex trafficking, the Super Bowl Host Committee's Anti-Sex Trafficking Planning Committee launched an all-out blitz to discourage this criminal activity. The 40 member coalition consisting of representatives from law enforcement, the Minnesota Human Trafficking Task Force, local businesses, county and state government, advocacy groups, non-profits and hospitals, plans to raise the public's awareness of the issue with billboards, media campaigns and specialized training for hotel, transportation and other hospitality workers on how to spot signs of commercial sex trafficking. In addition, there will be an increase in funding for victim support services such as shelter beds and counselling. In regards to sex trafficking in Minnesota, U.S. Bank Financial Crimes Control Manager Sande Bayer had this to say: "It's not just a one day event or a one week event. It's ongoing. It's not just happening because of the Super Bowl, it's a big problem that we need to address every day."

Minnesota is considered to be a national leader on anti-sex trafficking efforts. In 2011, it became the fifth state in the nation to enact a Safe Harbor Law. Under the law, trafficked minors are considered victims and cannot be prosecuted for prostitution. In addition, sex traffickers and consumers of sexual exploitation can face stiff penalties. Through the state's No Wrong Door

model, victims have access to a number of state-funded support services such as shelters, housing and counseling.

As Minnesota ranks 13th in the nation for incidents of sex trafficking, there will also be a heightened police presence in the form of coordinated stings to arrest sex traffickers and consumers of sexual exploitation.²⁷ According to Detective Carter Staaf of the Eden Prairie Police Department, “Our big concern, of course, is that the youth will be coming in. There is going to be runaway youth and some charismatic exploiter is going to talk them into an opportunity where they can go make money like they have never seen before and then be gone for the Super Bowl. We want to have the ability to have contact with those people and recover those kids and make an impact.”

Parting Thoughts

Commercial sex trafficking is subject to many influences. Events like the Super Bowl are just one potential influence due to the fact that the host city and surrounding area with a large concentration of individuals are desirable to a sex trafficker looking to profit over commercial sexual exploitation. However, the same can be said of other criminal offenses. Although it appears that Super Bowls do impact local sex marketplaces for a host city, the impact is brief and is not to the degree that sensational media reports would have you believe. While some of those media reports can create a greater awareness of the plight of commercial sex trafficking, it can also hurt anti-trafficking efforts by highlighting unsupported claims that can be discredited with just a little bit of research.

As a host city for a Super Bowl, it would be a smart play to avoid the stigma of being associated with commercial sex trafficking. Raising awareness among attendees and viewers at home will help convey the message that the city won't tolerate illicit sexual exploitation. It's a message that should be communicated to more boys and men of all ages.

At the end of the day, human trafficking remains a human rights issue. However, by raising awareness and understanding that commercial sex trafficking may play a role in some of the reportable activity identified in SARs, financial institutions can potentially prevent themselves from being used to contribute to the further victimization of trafficked individuals and provide the necessary leads law enforcement will use to track down and prosecute those parties that commit these crimes.

“Our fight against human trafficking is one of the great human rights causes of our time... It ought to concern every person, because it is a debasement of our common humanity. It ought to concern every community, because it tears at our social fabric. It ought to concern every business, because it distorts markets. It ought to concern every nation, because it endangers public health and fuels violence and organized crime. I'm talking about the injustice, the outrage, of human trafficking, which must be called by its true name -- modern slavery.”

- Former President Barack Obama

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²⁷<http://minnesota.cbslocal.com/2013/06/12/fbi-ranks-minnesota-13th-in-u-s-for-sex-trafficking/>

Thank You

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