



# HUMAN TRAFFICKING RESPONSE GUIDE

For the Tribal Gaming and  
Hospitality Industry



*This toolkit is a multiagency collaboration between the National Indian Gaming Commission (NIGC), Bureau of Indian Affairs (BIA), and the Departments of Homeland Security (DHS) and Treasury to raise awareness concerning Human Trafficking, its indicators, prevention and intervention tools, and the means for reporting suspicious activity. Our agencies remain committed to supporting safe and thriving indigenous communities through tools and resources to combat Human Trafficking that are culturally appropriate and survivor informed. Created at the request of, and with input from, tribal leaders, tribal gaming employees, and indigenous communities, this toolkit provides first-line tribal gaming and hospitality employees with information on how to detect, report, and ultimately prevent human trafficking. For informational purposes only, this toolkit does not replace or supersede any laws or regulations.*



## ABOUT THIS TOOLKIT

As a professional in the tribal gaming and/or hospitality industries, you are in a unique position to recognize and report potential human trafficking activities. You play an important role because you regularly interact with guests and the greater public in general. Hotels and motels are major locations where traffickers force sex trafficking victims to provide commercial sex acts to paying customers. Victims may be forced to stay at a hotel or motel where customers come to them, or they may be required to go to rooms rented out by the customers. Traffickers may also use hotels when transporting victims to new locations.

You may be able to recognize signs that a guest is in danger. This toolkit provides details about human trafficking and indicators of the crime so you can be better prepared to recognize a potential victim.

This toolkit includes information about:

- » What is human trafficking
- » How to recognize it among guests
- » Key indicators for gaming and hospitality employees
- » Examples of human trafficking in the tribal gaming and hospitality industry
- » Reporting options if you suspect a guest is affected by human trafficking or is being exploited

For the purposes of this toolkit, the term “victim” describes an individual experiencing human trafficking. The term “survivor” describes a former victim who is in the process of recovery.

## WHAT’S INSIDE

Blue Campaign is the unified voice for DHS efforts to combat human trafficking. Working with law enforcement; federal, state, tribal, and local governments; and nongovernmental and private organizations, Blue Campaign strives to protect the basic right of freedom and bring those who exploit human lives to justice. This toolkit offers tips and resources that can help you inform and educate your employees about human trafficking. It includes posters listing human trafficking warning signs for your staff. These posters can be displayed in public areas and staff common areas such as break rooms, employee dining rooms, laundry, and maintenance rooms.





## WHAT IS HUMAN TRAFFICKING?

**Human trafficking involves the use of force, fraud, or coercion to obtain some type of labor or commercial sex.**<sup>1</sup> Every year, millions of men, women, and children are trafficked in countries around the world, including the United States. Gaming and hospitality employees should be aware of different warning signs that could indicate human trafficking. One indicator does not necessarily equate to trafficking, but it is important to be aware of red flag indicators that include but are not limited to the descriptions on the following pages.

There are three different types of human trafficking:

### Sex Trafficking

- » Victims of sex trafficking are manipulated or forced to engage in sex acts for someone else's commercial gain. Sex trafficking is not prostitution.
- » Without exception, anyone under the age of 18 engaging in commercial sex is considered to be a victim of human trafficking.<sup>2</sup>

### Forced Labor

- » Victims of forced labor are compelled to work for little or no pay, often manufacturing or growing the products we use and consume every day.

### Domestic Servitude

- » Victims of domestic servitude are forced to work in isolation and are often hidden in plain sight as nannies, housekeepers, or other domestic help.

## Who It May Affect

**Human trafficking victims can be any age, race, gender identity, sex, ethnicity, nationality, immigration status, or socioeconomic class.** In many cases, victims do not seek help because of varying vulnerability factors that may include potential language barriers, a fear and distrust of authority, or the fact that they do not self-identify as a victim. Traffickers target vulnerabilities and look to satisfy whatever a potential victim needs, whether basic needs like food, shelter, or emotional support.

The United States' Trafficking in Persons Report identifies American Indians and Alaska Natives as particularly vulnerable. Native women experience more physical and sexual violence than other racial and ethnic groups. The effects of historical trauma are deeply felt in indigenous communities and populations. These and other factors — such as the complexity of jurisdictional law enforcement issues in Indian country — contribute to the disproportionate impact of human trafficking on indigenous people.



<sup>1</sup> To learn more about the definitions of force, fraud, and coercion and examples of different indicators of human trafficking, please see pg. 14-16 of the U.S Council's 2021 Annual Report: [https://www.state.gov/united-states-advisory-council-on-human-trafficking-annual-report-2021/#\\_Toc89431164](https://www.state.gov/united-states-advisory-council-on-human-trafficking-annual-report-2021/#_Toc89431164)

<sup>2</sup> See [18 U.S.C Chapter 77](#) for language on elements of the crime



## HOW TRAFFICKERS OPERATE

Traffickers often take advantage of the privacy and anonymity offered by the hospitality industry. They can operate discreetly because staff and guests may not know the signs of human trafficking. Traffickers often prey on victims with little or no social safety net, including a lack of social or family support systems, unstable housing, previous traumatic experiences or abuse, questionable immigration status, limited English proficiency, or an inability to decipher exploitative situations. There is no “single face” of traffickers. They can be any gender or from any background.

### What actions can tribal gaming and hospitality management take to help stop human trafficking?

You can play a significant role in helping to stop this terrible crime by:

- » Knowing the signs of human trafficking.
- » Designing a plan of action to respond to reports of human trafficking in your business.
- » Partnering with agencies that provide services to victims of human trafficking. In the case of lodging, consider offering vouchers to victims.
- » Providing employee training to help them understand and identify signs of human trafficking.
- » Distributing and posting the fact sheets in this kit to your employees.

### What to do if you suspect human trafficking

**Do not attempt to confront a suspected trafficker or alert a victim to your suspicions.**

Follow your organization’s reporting protocol, or call 911 or local law enforcement authorities if someone is in immediate danger.

You can report suspected human trafficking to: **Homeland Security Investigations (HSI) Tip Line** at **1-866-347-2423** or submit an HSI tip form online at <https://humantraffickinghotline.org/chat>.

To obtain victim support, contact the **National Human Trafficking Hotline** at **1-888-373-7888**.





## INDICATORS OF HUMAN TRAFFICKING — HOSPITALITY, SPA, AND MASSAGE PARLOR STAFF

Tribal gaming, hospitality, spa, and massage parlor employees are often in the best position to see potential signs of human trafficking, especially since your duties give you access to different areas of the properties. You may also have direct or indirect contact with both the traffickers and victims.

Does the guest...

- » Appear to be deprived of food, water, sleep, basic hygiene, medical care, or other necessities?
- » Act fearful, anxious, depressed, submissive, tense, nervous/paranoid, or disassociated/"checked out"?
- » Have bruises or other signs of physical trauma?
- » Have tattoos or scars that would indicate branding by a trafficker?
- » Have scars, cut marks, burns, or other signs of self-harm/suicidal tendencies?
- » Defer to another person to speak for them?
- » Appear to be coached on what to say or give responses that seem rehearsed?
- » Have a difficult time providing logical answers to basic questions?
- » Appear to be traveling with few or no personal items such as luggage or other bags?
- » Exhibit evidence of verbal threats, emotional abuse, or demeaning treatment?
- » Seem to be with a "boyfriend," "girlfriend," or romantic partner who is noticeably older?
- » Appear to be with a group of girls traveling with an older male or female?
- » Dress inappropriately for their age or in out-of-season clothing?
- » Appear to have no control over their money and/or ID?
- » Reference someone in their group being their "sugar daddy/sugar momma," or refer to themselves as a "sugar baby"?
- » Reference traveling to other cities or towns frequently?
- » Talk about getting paid very little or not at all for the work they do?
- » Appear to have no freedom of movement?
- » Have multiple cell phones, pagers, credit card readers, or other technology?





Do the service providers...

- » Provide any sexual or erotic services or advertise on illicit websites?
- » Wear very little clothing?
- » Refuse to service females?
- » Buzz the patron into the business?
- » Not handle their own cash?
- » Speak very little to no English?
- » Get transported to and from their place of work together and live in the same location?
- » Only work for short periods of time and new providers show up weekly or monthly?
- » Charge rates for services lower than the industry standard?

To test your knowledge of these signs, take [Blue Campaign's General Public Indicators Challenge](#), which includes an example of human trafficking in a hotel setting.

## What to Do If You Suspect Human Trafficking

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## INDICATORS OF HUMAN TRAFFICKING — SECURITY, SURVEILLANCE, AND TRANSPORTATION STAFF

Security, surveillance, and transportation staff may be the first to see patrons when they enter the premises. Patrons may exhibit behavior indicative of human trafficking. Each indicator alone may not necessarily mean a person is being trafficked.

Does the guest...

- » Appear distressed, disoriented, or have visible injuries?
- » Seem unforthcoming about their full names, home address, or vehicle information when asked?
- » Appear with a younger person that he or she did not come with originally?
- » Demonstrate aggressive, intimidating, or threatening behavior toward a person in areas away from general public view?
- » Appear to be a minor taking on adult roles or behaving older than their actual age (paying bills or requesting services)?
- » Sell items to or beg from other patrons or staff?
- » Enter/exit through the side or rear entrances, instead of the lobby or attempt to prop open exit doors?
- » Demonstrate suspicious behavior in private vehicles, RVs, or cab-over commercial trucks?
- » Park their vehicle or get dropped off in the parking lot so the license plate is not visible?

To test your knowledge of these signs, take [Blue Campaign's General Public Indicators Challenge](#), which includes an example of human trafficking in a hotel setting.

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# INDICATORS OF HUMAN TRAFFICKING — CASINO GAMING ATTENDANTS

First-line industry personnel have a unique position of being direct observers and participants of conversations and actions of casino patrons. You are in the best position to observe potential signs of human trafficking.

Does the guest...

- » Give excessive tips as a means to bribe for silence?
- » Solicit other patrons with phrases such as, "Winning big tonight," "Want to go smoke a cigarette," "Let's go back to my room and party."
- » Appear distressed, disoriented, or have visible injuries?
- » Seem unforthcoming about their full names, home address, or vehicle information when asked?
- » Appear with a younger person that he or she did not come with originally?
- » Have tattoos or scars that would indicate branding by a trafficker?
- » Have scars, cut marks, burns, or other signs of self-harm/suicidal tendencies?
- » Defer to another person to speak for them?
- » Appear to be coached on what to say or give responses that seem rehearsed?
- » Have a difficult time providing logical answers to basic questions?
- » Appear to be with a group of girls traveling with an older male or female?
- » Dress inappropriately for their age or in out-of-season clothing?
- » Appear to have no control over their money and/or ID?
- » Reference someone in their group being their "sugar daddy/sugar momma," or refer to themselves as a "sugar baby"?
- » Reference traveling to other cities or towns frequently?
- » Talk about getting paid very little or not at all for the work they do?
- » Appear to have no freedom of movement?
- » Have multiple cell phones, pagers, credit card readers, or other technology?

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## INDICATORS OF HUMAN TRAFFICKING — FOOD AND BEVERAGE STAFF

Food and beverage staff may have access to a guest's room or see them using the hotel restaurant or bar. While no single indicator is necessarily proof of human trafficking, recognizing the signs is the first step in identifying possible victims.

Does the guest...

- » Entertain a minor at the bar or restaurant that he/she did not come in with originally?
- » Claim to be adult although appearance suggests he/she is a minor?
- » Loiter or solicit patrons or staff?
- » Wait at a table or bar to be picked up by a patron?
- » Ask staff or other patrons for food or money?
- » Take cash or receipts left on tables?
- » Attempt to recruit other victims?

To test your knowledge of these signs, take [Blue Campaign's General Public Indicators Challenge](#), which includes an example of human trafficking in a hotel setting

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# INDICATORS OF HUMAN TRAFFICKING — HOUSEKEEPING, MAINTENANCE, AND ROOM SERVICE STAFF

Housekeeping, maintenance, and room service staff typically have the most access to guest rooms where signs of human trafficking may be apparent. By being conscious of human trafficking indicators, you can help identify possible trafficking activities and victims.

Does the guest...

- » Use the “Do Not Disturb” sign constantly?
- » Request additional towels, new linens, etc., multiple times a day but deny hotel/motel staff entry into the room?
- » Refuse cleaning services for multiple days?
- » Keep excessive amounts of cash in the room?
- » Possess multiple computers, cell phones, credit card readers, or other technology?
- » Reserve multiple rooms?
- » Leave the room infrequently, not at all, or at odd hours?
- » Possess children’s items or clothing without having a child registered with the room?
- » Loiter in the hallways and appear to monitor the area?
- » Keep excessive amounts of alcohol or illegal drugs in their room?
- » Possess evidence of pornography or sex paraphernalia (condoms, lubricant, lotion, etc.)?
- » Leave minors alone in their room for long periods of time?
- » Have an excessive number of people staying in their room?
- » Stay for an extended period of time with few or no personal possessions?
- » Allow a constant flow of people into a room at all hours?
- » Keep their room stocked with merchandise, luggage, mail packages, and purses/wallets with different names?
- » Loiter in the parking lot, lobby, or hallways and return to the room after a visitor leaves?

To test your knowledge of these signs, take [Blue Campaign’s General Public Indicators Challenge](#), which includes an example of human trafficking in a hotel setting.

## What to Do If You Suspect Human Trafficking

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## INDICATORS OF HUMAN TRAFFICKING — CONCIERGE, BELLHOP, FRONT DESK, AND VALET STAFF

Concierge, bellhop, front desk, and valet staff are typically the first to see guests when they enter the hotel. When checking in or requesting hotel amenities, a guest may exhibit behavior indicating human trafficking.

Does the guest...

- » Appear distressed, disoriented, or have visible injuries?
- » Not know the hotel name or area where they are?
- » Reserve multiple rooms?
- » Pay for their room with cash or pre-loaded credit card?
- » Use hotel computers for adult-oriented or sexually explicit websites?
- » Seem unforthcoming about their full name, home address, or vehicle information when registering?
- » Appear to be a minor taking on adult roles or behaving older than their actual age (paying bills or requesting services)?
- » Appear with a minor that he or she did not come with originally?
- » Rent pornography when children are staying in the room?
- » Have repeated visitors over a period of time, particularly those dropped off at the hotel?
- » Leave the room frequently, not at all, or at odd hours?
- » Appear to be a minor with a patron late at night or during school hours (not on vacation)?
- » Have no identification or use an ID that is not theirs?
- » Rent the room by the hour, for less than a day, or for a long-term stay that does not appear normal?
- » Request information or access to adult services or the sex industry?
- » Rent a room with fewer beds than patrons?
- » Sell items to or beg from other patrons or staff?
- » Enter/exit through the side or rear entrances instead of the lobby or attempt to prop open exit doors?
- » Park their car in the parking lot so that the license plate is not visible?

To test your knowledge of these signs, take [Blue Campaign's General Public Indicators Challenge](#), which includes an example of human trafficking in a hotel setting.

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## EXAMPLES OF HUMAN TRAFFICKING

The following examples are fictional but based on actual tactics that traffickers use to exploit victims. These are indicators that someone is a potential victim of human trafficking. How you respond should be in accordance with your company's protocol.



### Suspicious Check-In

Sydney is the front desk agent at a full-service hotel. One day, during a morning shift, a male patron approaches the check-in counter accompanied by a child who appears to be in her early teens. Sydney notices that the teenager looks tired and distressed. She also realizes that it is a weekday, and that this interaction is taking place during school hours. As the patron requests a room for a one-night stay, Sydney also notices that the teenager refuses to make eye contact. When Sydney asks the patron for identification, he becomes defensive. He asks, "Why would I need to show you my ID if I'm paying in cash?" Sydney explains that it is company policy. Annoyed, the patron leaves with the teenager at his side. Sydney senses that something is off about this encounter and calls her supervisor to discuss what to do next.



### Red Flag Service Ticket

Marcus is answering a guest service order at the motel where he is a maintenance technician. Upon arrival to the room, an older female patron opens the door slightly but keeps the chain lock on. Through the crack in the door, Marcus can see a young adult male sitting on the edge of the single bed. Although the room is dimly lit, he can see the young man has bruises on his arm and neck and appears to be quietly crying. When he announces that he is there to fix the air conditioner, the patron becomes visibly irritated. "Why can't you fix it from the outside?" she asks. Marcus explains that it is an in-room unit. The patron tells him, "Never mind," and shuts the door. Marcus realizes that he has seen the patron in the hallway several times before, acting as if she is monitoring the area. He decides to report what he saw to his supervisor for additional action.



### Troubling Behavior

Pat is working the evening shift as a table games dealer. Two new patrons arrive. One is a young female who is dressed in clothing that is inappropriate for the cold weather. She is in the company of Brian, an older male companion. Brian does not allow her to share her name, and he always answers when Pat tries to make friendly conversation with the pair. Pat has noticed that Brian is in full control of the young female's money and tells her where to place her bets. She only makes eye contact with Brian and speaks solely to him. Over the next several hours, Pat observes the young female going between the hotel lobby elevators and the gaming floor, each time with a different male. Brian is friendly with the other male patrons and does not seem bothered when she leaves with them. The female returns to the table looking very distressed but remains submissive to Brian. Recalling the training he received on identifying and responding to human trafficking indicators, Pat follows the established casino protocol and immediately reports what he has observed to his supervisor.





## HOW MONEY LAUNDERERS AND HUMAN TRAFFICKERS CAN EXPLOIT CASINOS

Money laundering through casinos generally occurs in the placement and layering stage. One typology is for a launderer to buy chips with cash generated from a crime and then request repayment by a check drawn on the casino's account. Often, rather than requesting repayment by check in the casino where the chips were purchased with cash, the launderer states he/she will be traveling to another country in which the casino chain has an establishment, asks for his/her credit to be made available there, and withdraws it in the form of a check in the other jurisdiction.

### RED FLAG INDICATORS OF MONEY LAUNDERING

- » Use of third parties to purchase gaming chips or to conduct wagering.
- » High volume of transactions within a short period or frequent betting transactions just under thresholds.
- » Purchasing and cashing out casino chips with no gaming activity.
- » Exchanging large quantities of quarters from non-gaming proceeds for paper currency.
- » Cashing in winnings as a combination of chips, check, and cash or under reporting thresholds.
- » Customer conducts several transactions under reporting thresholds over several shift changes.
- » Customer moving from table to table or room to room before the wagering amounts reach the reporting threshold.
- » Opening a casino account or purchasing casino chips with small denominations bills.
- » Customer gambling with large amounts of small denomination bills.

The gaming industry is uniquely positioned to recognize and report victims of human trafficking and has direct crossover with two targeted industries; transportation and hospitality. Traffickers utilize transportation methods including charter buses, public busing, taxis, and ride sharing services to facilitate the movement of victims as well as casinos and hotels as a venue to conduct and conceal their illicit activities.





# HOW TO REPORT HUMAN TRAFFICKING OR GET ADDITIONAL SUPPORT

**Do not at any time attempt to confront a suspected trafficker directly or alert a potential victim to your suspicions. Call 911 or your local law enforcement agency for emergency situations — threats of violence, physical assault, emergency medical needs, etc.**



Please refer to your organization’s protocol for reporting suspected instances of human trafficking and engage additional support resources. Also, consider contacting your state, tribal, or local human trafficking task force for support. Call **1-866-347-2423** to report suspected human trafficking to the **Homeland Security Investigations (HSI) Tip Line** 24 hours a day, 7 days a week, every day of the year.

Highly trained specialists take reports from both public and private agencies on more than 400 laws enforced by HSI, including those related to human trafficking. HSI agents and Victim Assistance Specialists responding to reports are trained specifically on a victim-centered approach to stabilize victims and connect them with support services, including providing immigration relief for qualifying victims.<sup>3</sup> You can also **submit an anonymous tip online via the HSI Tip Form** at: [ice.gov/webform/hsi-tip-form](https://ice.gov/webform/hsi-tip-form).

**Call 1-888-373-7888 or text HELP or INFO to BeFree (233733)** to report suspected human trafficking to the National Human Trafficking Hotline (NHTH), which takes calls from victims and survivors of human trafficking and those who may know them. The NHTH can help connect victims with service providers in their area and assist in reporting their situation to trusted law enforcement contacts. The NHTH is a national, toll-free hotline available to answer calls from anywhere in the country, 24 hours a day, 7 days a week, in English, Spanish, and more than 200 other languages. The NHTH is not a law enforcement or immigration authority and is operated by a nongovernmental organization.

**Call 1-800-THE-LOST (1-800-843-5678) or go to CyberTipline.org** to report suspected child sex trafficking, sextortion, online enticement, and sexual abuse material to the **National Center for Missing and Exploited Children (NCMEC)**. NCMEC is a nonprofit organization, available 24/7 to work with families, victims, private industry, law enforcement, and the public to support the identification, location, and recovery of child sex trafficking and child sexual exploitation victims.

## Contact Blue Campaign

[BlueCampaign@hq.dhs.gov](mailto:BlueCampaign@hq.dhs.gov)  
[dhs.gov/bluecampaign](https://dhs.gov/bluecampaign)



[@dhsbluecampaign](https://twitter.com/dhsbluecampaign)

## Contact National Indian Gaming Commission

[contactus@nigc.gov](mailto:contactus@nigc.gov)  
[nigc.gov](https://nigc.gov)  
[@NIGCgov](https://twitter.com/NIGCgov)

## Contact Bureau of Indian Affairs

[bia.gov](https://bia.gov)  
[@USIndianAffairs](https://twitter.com/USIndianAffairs)

## Contact Department of Treasury

[home.treasury.gov](https://home.treasury.gov)  
[@USTreasury](https://twitter.com/USTreasury)



<sup>3</sup> Learn more about immigration assistance at [dhs.gov/blue-campaign/immigration-assistance](https://dhs.gov/blue-campaign/immigration-assistance)