



SEX TRAFFICKING INDICATORS FOR LODGING ESTABLISHMENTS

One indicator by itself may not signify an incident of sex trafficking. Managers are advised to use their best judgment to observe trafficking indicators and report to law enforcement when a crime is suspected. Due to the potential for harm to trafficking victim(s), guest(s), or employee(s), employees should normally call in trained law enforcement officers rather than intervening directly.

MAJOR INDICATORS

- **Buying:** Patron requesting information or access to adult services or sex industry
- **Minor:** Underage (17 and younger) prostitution
- **Pimping:** Prostitution with the presence of a pimp or a second prostituted person
- **Eye contact:** Unusual unwillingness to make eye contact
- **Evidence of abuse:** A guest has evidence of physical abuse (bruises, cuts, broken arm, etc.)
- **Unusual control:** One party (a) controlling another party or a group of people, (b) speaking on behalf of or not allowing another person or group to speak, or (c) entering with a guest and lurking suspiciously in the background
- **Distress:** A guest appearing unusually distressed, afraid, or coerced
- **Branding:** Youth or women who have been “branded” by a visible tattoo, especially on the neck with a name or dollar sign

LOBBY, RECEPTION, PARKING LOT, AND PUBLIC AREAS

- Guest or visitor with signs of physical abuse or malnutrition
- Guest or visitor dropped off by a person(s) who waits in the car in a parking lot
- Guest or visitor observed/followed by a male or female who waits in the lobby
- Guest asking for free food or for money from employees or guests
- Persons, especially those who live locally, visiting a hotel room at regular time intervals, such as every 30 minutes or 1 hour
- Guests in a room leaving the room, waiting around, and returning (while a buyer visits the room)
- Minor or any guest using the business center or public computer to post ads for sexual services
- “Friend” or “relative” visiting a guest who cannot provide the name of the guest or other identifying information
- Person visiting a guest at suspicious hours (lunch break, late night, or early morning)
- Guest or visitor dressed unusually for age or environment, such as a minor dressed overly mature for age or lacking warm clothing in cold weather
- Guest checks in without luggage or guest takes no luggage to the room
- Negotiation for sexual services in a public place
- Unusual level of traffic coming through the lobby and heading to one or a few rooms
- High level of calls to a certain room or people calling the room who do not know the name of the guest

RESERVATIONS

- A person reserving a room and requesting a suspicious location (next to an exit, on the hall alone, etc.)
- A person who lives locally regularly booking a room or multiple rooms with no clear ties to a business
- A person repeatedly booking a room or multiple rooms through an OTA at the last minute
- Other unusual or suspicious booking behaviors

CHECK-IN

- Adult is checking in with a minor, and (a) either the adult or minor appears nervous (red face, sweating, drumming fingers, fidgeting, etc.), or (b) the minor appears tense, is afraid to make eye contact, or is standing at a distance from the adult
 - *You may ask innocuous questions and observe any unusual responses. To the adult: "How old is your child?" or "Do you have more children with you?" To a child: "Hello, how are you? What is your name? Are you on break from school? Are you excited about your visit to [city]?"*
- Person who looks very young or is a minor behaving like an adult (checking in, paying a bill, requesting services, etc.)
- Person who does not make eye contact with front desk manager
- A guest checking in without luggage or only with plastic bags
- Individuals checking into rooms have no ID or fake ID
- Patron not forthcoming about full name, home address, or vehicle information
- Room paid with rechargeable credit card, green dot card, or cash
- Room rented has fewer beds than guests
- Room is rented and used for less than a day or for a long-term stay that is out of the ordinary
- A guest makes unusual requests for the location of room, such as a room near an exit or a room in a remote part of the hotel
- Complaints from guests about unusual noises, unusual visitors, or door constantly opening and closing
- Unusual number of keys are requested for a room, exceeding number of guests in the room

ONLINE/TV

- Phone number or photo of hotel guest listed in an online escort service ad
- Number or name of hotel listed in an online escort ad
- Photo taken in a room of the hotel posted in an online escort ad
- Guest frequenting social media sites, sexually explicit sites, or escort sites, especially with a child in the room
- Guest renting pornography with a child in the room

HOUSEKEEPING/ROOM SERVICE

- Minor(s) staying in a hotel room unaccompanied during school hours
- Multiple condoms in trash, especially if a minor is in the room
- Excessive use of towels
- Minor dressed overly mature in a room or knocking on door of a room
- Excessive lingerie in room with a minor
- Excessive amounts of cash, alcohol, or illegal drugs
- Excessive number of people staying in a room
- Constant flow of guests (especially men) to the room
- Rooms stacked with tagged merchandise, purses or wallets, or mail packages
- "Do Not Disturb" sign posted constantly or refusal of cleaning service for several days
- Presence of multiple computers, cell phones, pagers, credit card swipes, or other technology
- Individuals not leaving the room or leaving infrequently or at unusual hours
- Extended stay with few or no personal possessions
- Guests or visitors asking for food or money
- Individuals standing outside of a room or appearing to monitor a hallway
- Men waiting in the hall to enter a room
- Excessive amounts of sex paraphernalia in a room
- Evidence of pornography being filmed in a room, such as camera equipment and excessive lingerie in room with a minor

RESTAURANT/BAR

- Hotel guest or visitor systematically approaching unknown men in a bar/restaurant (this could be a prostituted person or a pimp)
- Hotel guest or visitor leaving the bar/restaurant with different men for a regular period of time
- A minor meeting a man s/he does not know, especially if s/he is dressed to look older or the man is making advances
- A minor carrying a fake ID, especially if on a date
- A visitor or guest asking for free food
- A visitor or hotel guest with signs of malnourishment, physical abuse, or assault
- An assault or violent altercation
- Negotiating for sexual services
- Evidence of unusual control (such as a person speaking for another person or holding the money or documents of another person)
- Evidence of unusual fear, anxiety, or submission

SECURITY

- Observed or recorded evidence of any of the above indicators
- Doors propped open (which may be done to allow guests to bypass the lobby area)
- Unusual number of visitors to a room
- Guest frequenting hotel and visiting different rooms
- Report of a possible domestic violence or assault situation
- A minor committing a crime

LABOR TRAFFICKING INDICATORS FOR LODGING ESTABLISHMENTS

Labor trafficking is the use of force, fraud, or coercion to compel a person into work. Human smuggling, by contrast, is the movement of consenting persons. In labor trafficking, a person(s) is being controlled and believes that s/he is not free to leave the trafficker. Labor trafficking may occur in three ways in a lodging establishment:

1. A hotel manager contracts with a party that traffics workers.
2. A hotel manager or owner traffics employees.
3. Trafficked persons are housed in a lodging establishment.

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- **Unusual control:** One party (a) controlling another party or a group of people, (b) speaking on behalf of or not allowing another person or group to speak, or (c) entering with a guest and lurking suspiciously in the background
- **Excessive fear or submission:** A worker or guest who appears afraid or who is unusually submissive toward a direct employer, a family member, or other person
- **Evidence of abuse:** A worker or guest with signs of physical abuse (bruises, cuts, broken arm, etc.)
- **Threats of harm** to worker or worker's family
- **Employer control** of travel documents (originals)
- Worker is required to live in **employer-controlled lodging**
- **Worker owes debt** to the trafficker
- **Trafficker withholds excessive fees** from paycheck or withholds paycheck entirely
- **A room rented for worker(s) under unusual conditions** such as (a) too many people housed in one room, (b) workers living and eating only in the room when not working, (c) workers are not free to come and go, or (d) unusual control or submission