Human Trafficking in Illicit Massage Businesses

Polaris

About Polaris

Polaris is a leader in the global fight to eradicate modern slavery. Named after the North Star that guided slaves to freedom in the United States, Polaris systemically disrupts the human trafficking networks that rob human beings of their lives and their freedom. Our comprehensive model puts victims at the center of what we do — helping survivors restore their freedom, preventing more victims, and leveraging data and technology to pursue traffickers wherever they operate.

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Letter from Rochelle Keyhan

Director, Disruption Strategies, Polaris

Dear Readers,

The United Nations estimates that more than 40 million people in the world today are living in some form of modern slavery. That staggering figure makes one thing abundantly clear: We cannot end human trafficking one victim, one case, one incident at a time. We have to scale up.

The Disruption Strategies team at Polaris has taken on the challenge of scaling up by developing ways to make life difficult for human traffickers. We are finding, testing and refining approaches that make it more risky and less lucrative for traffickers to do business, and bringing those approaches to stakeholders in cities, suburbs, and rural areas — anywhere we find dedicated, invested partners.

Our work is guided by a groundbreaking 2017 Polaris report, *The Typology of Modern Slavery,* which identifies 25 individual types of human trafficking in the United States today. Each type has its own business model, defying a one-size-fits-all approach to ending human trafficking. If we want to disrupt trafficking, we have to do it one type at a time.

Currently, the Polaris Disruption Strategies Team is focusing on illicit massage businesses (IMBs), a unique form of trafficking that operates in plain sight in communities across the country. Our mission is close to my heart. As a prosecutor for six years, I saw many potential trafficking victims arrested for prostitution in IMBs. In some cases, they were deported before I even had the chance to assess whether they might be trafficking victims. Meanwhile, the business owners and operators who exploited and abused them walked free, having manipulated the system to punish the victim — not the trafficker. I knew this was a cycle that we could end.

Today, our team approaches the work of ending IMB trafficking by identifying exploiter-focused, victim-centered strategies that work. We build off of the work of Polaris' National Human Trafficking Hotline's engagement with survivors, consulting and working with survivors and direct service providers to assess the needs and realities articulated by victims of human trafficking. We also meet with invested local heroes around the country doing innovative, effective work to shut down trafficking in their communities, and we connect them to each other as well as to communities who are ready to learn from them. Sometimes we connect agencies within a single jurisdiction to help them understand how — and why — they can work together. We provide research and best practices to make sure that local anti-trafficking efforts are both informed by national trends and responsive to local community needs, producing sustainable and relevant shifts in their local systems.

I am proud to say that there are countless communities that want to do this work, and do it right. There are also, of course, significant barriers, including lack of knowledge, resources, and support to serve survivors and keep them safe.

In the past two years, we have assisted with the passage of dozens of local laws, as well as three statewide laws that increase protections for survivors and accountability for traffickers in 709 U.S. cities. We have engaged more than 100 law enforcement jurisdictions across 31 states, helping them understand the difference between human trafficking and prostitution and both how and why to adopt an exploiter-focused, victim-centered approach to human trafficking in IMBs. This approach ensures that every future operation represents another step away from repetitious low-level arrests that typically only penalize potential victims, towards a future where traffickers are held accountable and our communities become inhospitable to them. As a result of consulting directly with survivors themselves, we have also empowered and connected more than two dozen service providers to improve the cultural humility and diversity of their services for IMB survivors, and to form a national safety net for survivors.

I am incredibly proud of the work we do, and of the people who have collaborated with us, opened their hearts and eyes to new ways of doing things, and asked for and offered invaluable help. We are constantly learning, together. With this report, we invite you to join us.

Rochelle Keyhan
Director, Disruption Strategies, Polaris

Acknowledgements

This report was a collaborative effort, spearheaded by Rochelle Keyhan, Director of Disruption Strategies, and the Disruption Strategies team including Meghan Carton, Anna Kegler, Veronica Buckley, Sydney Boone, Francheska Loza and Alexa Schaeffer who together produced the original research and analysis, and were instrumental to the creation of this report. Bradley Myles, Nancy McGuire Choi, Caren Benjamin, and Sara Crowe generously provided input and edits throughout, and we are also grateful to the many others across Polaris who helped make this report a success. We would like to thank the National Human Trafficking Hotline team for its dedication in serving survivors, with a special thanks to Samantha Gillis for working to ensure calls related to potential IMB trafficking are consistently handled in a way that is culturally-competent and sensitive to the particular needs of IMB survivors.

We are grateful to the NoVo Foundation, whose generous financial support made this report possible.

We would never have been able to complete this report without help from many passionate, dedicated individuals and partnerships. We would like to thank our law enforcement partners for sharing their knowledge and experience investigating and prosecuting IMB trafficking cases. Thank you specifically to the **Los Angeles Sheriff's Department**, **Seattle Police Department, King County Prosecutor's Office, and the San Francisco Department of Public Health** for their contributions. Thank you to **Demand Abolition** for sharing buyer data and insights in advance of its upcoming report. We would also like to thank our partners in business and finance for sharing their invaluable expertise with us.

Thank you to **Attorney General Bob Ferguson (WA), Attorney General Sean Reyes (UT),** and the **National Association of Attorneys General (NAAG)** for their early support, including leading the recruitment of their colleagues to partner with Polaris to disrupt trafficking in IMBs on a national scale. Thanks to their efforts, partnership among Attorney General Offices has ranged from making efforts to understand the footprint of IMBs in a given state, to joining a dialogue with other communities who are also undertaking this work, to deploying different investigative strategies and prosecutorial tools to increase risk and decrease the profits for traffickers.

We would like to thank all of the dedicated contract researchers and volunteers who helped us map IMBs across the country, investigate recruitment patterns, and research laws and other aspects of IMB trafficking.

Thank you to Eliza Carmen, Cristina Kinsella, Raydia Martin, Andreia Martino, Leigh Creighton Bond, Stephanie Bagnell, Erica Avery, Annie Khan, Alison Aminzadeh, and Victoria Ruby for researching laws and ordinances across the country. Thank you to Klara Wisniewska, Sarah Zalonis, Alisha Malkani, and Lori Sturdivant for helping us map IMBs nationally, and Bailey Powe for analyzing recruitment data, and to Megan Rigabar for researching how Yelp and Groupon allow IMBs to create a veneer of legitimacy.

Most importantly, we would like to extend our gratitude to the survivors of trafficking who have found the courage to share their experiences with our hotline advocates and service provider partners around the country. Without their testimony, this report would not exist.

Special Acknowledgements: Service Providers

We would like to extend special gratitude to the following service providers across the country who shared their knowledge and experience gained working directly with IMB survivors. Their generosity with time, resources and data has helped ensure that survivor voice and experience is elevated throughout this report.

California

Asian Pacific Islander Legal Outreach (APILO): Since 1975, Asian Pacific Islander Legal Outreach has worked to level long-standing barriers that have denied Asians and Pacific Islanders equal justice and equal access to the legal system in San Francisco and the Bay Area. APILO's community-based model means that leadership on vital issues, and its mission to instill in the community a sense of legal rights and protections while advocating against injustice, have always been driven from the community upward.

Coalition to Abolish Slavery and Human Trafficking (CAST): The Coalition to Abolish Slavery and Trafficking (CAST) is a Los Angeles-based nonprofit organization that is working to put an end to modern slavery and human trafficking through comprehensive, lifesaving services to survivors and a platform to advocate for groundbreaking policies and legislation. Over the past two decades, CAST has supported thousands of survivors through every phase of their journey to freedom from counseling, to legal resources, to housing, educational and leadership training and mentorship.

International Institute of Los Angeles (IILA): The International Institute of Los Angeles was founded in 1914 to help newly arrived immigrants integrate into their new lives in Los Angeles. Throughout the years, IILA has helped hundreds of thousands of immigrants and other low-income people overcome the barriers they face in becoming contributing members of society.

San Francisco Department of Public Health's Newcomers CONNECT Project: Newcomers CONNECT Project provides needed resources and linkages to populations vulnerable to exploitation, specifically foreign-born workers at massage establishments and restaurants, and their families and friends. Activities include conducting door to door outreach, focus groups, one-on-one needs assessments, educational material development, social media networking, and navigating linkages to community organizations for English as a Second Language and job opportunities.

Opening Doors: Opening Doors helps those escaping human trafficking and newly-arrived refugees to restart safe and healthy lives in Sacramento, California. With their multicultural staff and volunteers, Opening Doors provides outreach, training and technical assistance on human trafficking; case management and immigration legal services for human trafficking victims; comprehensive resettlement services for refugees; and tools for immigrants, refugees, and low-income citizens to build or grow small businesses, and to gain greater control over their personal finances.

New York

Garden of Hope NY: From rescuing and counseling battered women and their children to servicing families experiencing dysfunction, Garden of Hope NY achieves its goals through a hotline, counseling, legal aid, emergency shelter, support groups, employment training, parenting education, and summer camp for exposed children.

Korean American Family Services Center: The Korean American Family Service Center (KAFSC) is a leading nonprofit organization that supports and empowers adults, youth and children to lead safe and healthy lives based on dignity, compassion and mutual

respect. KAFSC is committed to preventing and ending domestic violence, sexual assault, and relationship abuse, and creating a violence-free society. KAFSC's counseling, education and advocacy programs for individuals and families in the New York Tri-State Area are provided in a culturally and linguistically appropriate setting.

RestoreNYC: RestoreNYC serves foreign national survivors of sex trafficking with a holistic, trauma-informed, and culturally sensitive approach. It is committed to ensuring that survivors experience greater independence and well-being. As one of the primary nonprofits providing counseling and advocacy through the New York City Human Trafficking Intervention Courts, RestoreNYC's services include educating clients about their legal rights, trafficking, and community resources.

Safe Center Long Island: The Safe Center offers a broad spectrum of services including counseling, housing, advocacy and referrals through a highly trained, nurturing and compassionate staff of professionals well-qualified to provide the highest level of services to enhance the recovery of trauma victims and their non-offending family members.

Sanctuary for Families: Sanctuary for Families is a service provider and advocate for survivors of domestic violence, human trafficking, and related forms of gender violence in New York. Every year, it empowers thousands of adults and children to move from fear and abuse to safety and stability, transforming lives through a range of comprehensive services and advocacy.

Ohio

Asian American Community Services (AACS): Asian American Community Services (AACS) is the premier non-profit community-based organization serving the needs of all Asian Pacific Islanders in Central Ohio. Since 1976, AACS has led efforts to empower and develop the local Asian community through its expansive and proactive programs and services.

Texas

YMCA International: YMCA International Services is a unique center of the YMCA of Greater Houston that delivers client-centered programs to refugees, immigrants and other vulnerable populations to advance their economic independence, social integration and civic participation. The Y helps newcomers restore hope, build stability, create opportunity, and change futures.

Utah

Refugee and Immigrant Center - Asian Association of Utah (RIC-AAU): The Refugee and Immigrant Center - Asian Association of Utah was founded in 1977 and is a private, non-profit, community-based organization located in Salt Lake City. Originally established to support Asian immigrants and refugees in their transition to life in the United States, the organization has expanded its resources and services over the past 40 years to assist refugees and immigrants from around the world. Today, it serves more than 2,000 refugees, immigrants, and other community members each year.

Introduction

Illicit massage businesses (IMBs) that front for commercial sex operations have been ubiquitous in the American landscape for decades, with an estimate of more than 9,000 operating today. Commonly called "massage parlors," these businesses dot the sides of highways and are tucked into suburban strip malls between fast food restaurants and dollar stores and behind darkened windows in storefronts in some of America's biggest cities. While some keep a low profile, many others blatantly advertise "Asian gals," or bear sexualized names like "Good Girl Spa." Anyone looking to purchase commercial sex is just a few clicks away from any number of review sites that offer extremely detailed information about both the businesses themselves and the individual women exploited within them.

↑ Spa in Tampa, Fla

The sheer number of fake massage businesses, coupled with the impunity with which they operate, has over time fostered widespread — if tacit — cultural acceptance of the industry. The frequent wink, wink, nudge, nudge references to "happy endings," in popular culture is just one manifestation of perception that while commercial sex is illegal, in this context, it is essentially harmless.

That perception is wrong. There may be women who choose to sell sex either along with or under the guise of massage therapy, but evidence suggests that many of the thousands of women[1] engaging in commercial sex in IMBs or "massage parlors" are victims of human trafficking.

To those women, the term "happy ending," with its faint whiff of fairy tale, is cruelly ironic. Most of them are immigrants, chasing a dream of financial stability in a faraway land, seeking not a prince but a steady job with decent wages. So they answer an ad for a massage therapist and discover, too late, that "massage" is a euphemism and that they are expected to provide services for which they will be paid some portion of the tips they earn, if they are lucky, or less, if they are not. They live in substandard conditions, work illegal hours "on call," and many feel they have no choice but to comply with the mandate to perform sex acts. They are told they will be deported by immigration, or their families will be hurt; that they owe the owner money and that if they leave, police will arrest them for prostitution. Every story is a little different but they all share a common pattern that combines fraud, threats and lies with poverty, fear and the potential for violence.

The information gathered here comes from published sources, intensive interviews with survivors of human trafficking, law enforcement, and service providers as well as from Polaris's historic work in the field and analysis of cases reported to the National Human Trafficking Hotline (NHTH).

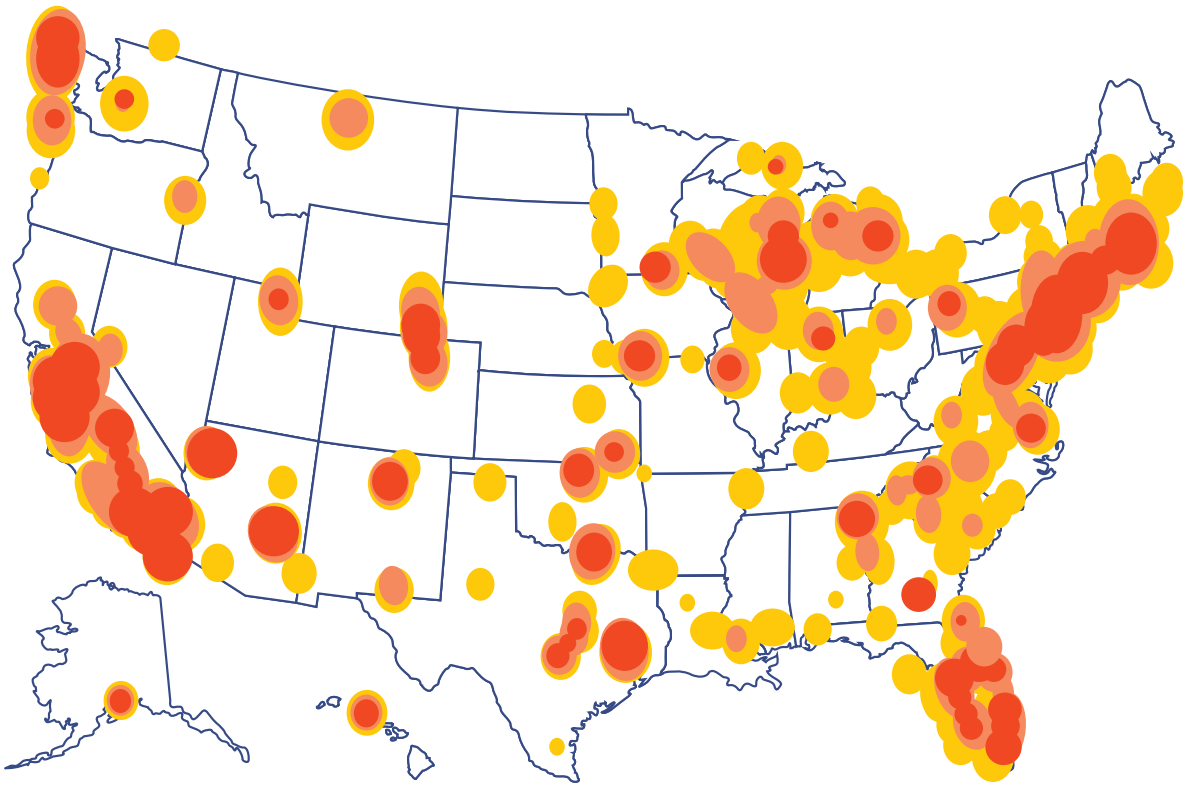
↑ Haunting poster reading "Today's the day to believe in fairy tales" found taped to the bedroom door of women living on-site in an IMB in Washington, D.C., during a 2008 police raid

Polaris created the term "illicit massage business" to describe a very specific type of exploitative, organized, commercial-front trafficking venue that we saw implicated over and over in cases reported to the Hotline. The term does not encompass legal, therapeutic massage businesses, nor does it include consensual sex work that may incorporate massage.

Our goal in compiling this information is to provide a resource guide for law enforcement, policy makers, media and others in the broader community. We seek to provide the tools to recognize the problem and help these audiences consider what steps they might be able to take to combat human trafficking in illicit massage businesses and provide better options for women who want them.

Section 1: Understanding Human Trafficking In Illicit Massage Businesses

Overview of Illicit Massage Businesses in the United States



Scope of the illicit massage industry in the United States

According to Polaris's research, there are more than 9,000 illicit massage parlors currently open for business in America, and they can be found in every state.

The illicit massage industry appears to be booming. A 2014 report on the underground commercial sex economy found that "the number of erotic massage parlors is increasing in the United States ... and they are proliferating beyond the West and East coasts where the majority of them are clustered."[2] Our analysis suggests that total annual revenue of illicit massage businesses (IMBs) in the United States hovers around $2.5 billion annually.[3] This figure aligns with recent research by Vanessa Bouché, who found that the illicit massage industry in the city of Houston alone was $107 million per year, and extrapolated this to a potential national figure of $2.8 billion annually.[4]

~ 9,000+
illicit massage businesses currently open for business in America

$ ~ 2.5
billion annual revenue

Indicators that a massage parlor is engaging in commercial sex and potential human (sex or labor) trafficking include:

- Prices significantly below market-level (e.g. $40 for a one-hour massage in a city where $80 is the norm)
- Women report that they need a large tip (e.g. for expenses, food, family), sometimes even expressing distress if they do not receive a tip
- Women typically serving customers excessive hours, or even being on call at all times
- Women appear to be living in the business or women living in trafficker-controlled secondary site (e.g. apartment, house)
- Serves primarily or only male clientele
- Locked front door, customers can only enter if buzzed in, or enter through back or side doors that are more discreet
- Windows are covered so passersby cannot see into the establishment
- Regular rotation of women; new women coming in every several weeks
- Advertising on commercial sex websites like Rubmaps.com, Backpage.com, or aampmaps.com

Extremely low prices in Los Angeles

Discreet rear entrance and parking in Tampa, Fla

Security-camera surveilled, buzzer-controlled entrance in Philadelphia

Licensing and regulation of these businesses is an easily exploitable patchwork of state and local laws and ordinances that allows this blatantly illegal industry to survive and thrive in such a public way. This is in part due to the variation of these regulations across locations. As will be discussed in more detail later in this report, changing the legal and regulatory framework will go a long way toward shutting down illicit massage businesses.

Scope of trafficking in illicit massage businesses

In 2017, Polaris analyzed more than 32,000 cases of human trafficking and developed a classification system that identifies 25 distinct types of human trafficking in the United States. Each one has its own business model, trafficker profiles, recruitment strategies, victim profiles, and methods of control that facilitate human trafficking. They all fall roughly into categories of sex trafficking, labor trafficking or a hybrid of the two — that is, venues that involve both sex and labor trafficking. Trafficking related to illicit massage parlors accounted for 2,949 cases — second in prevalence only to trafficking in escort services.[5] Most of the victims are women in their mid-thirties to late fifties from China and South Korea. Additionally, most are mothers struggling to support their children. According to data from Restore NYC, 80 percent of the IMB survivors it has served have at least one child, and 84 percent of their children are overseas.[6]

It is not known exactly how many women working in massage parlors today are trafficked. The data from the National Human Trafficking Hotline almost certainly does not represent anything close to the scope of the problem. By its very nature, human trafficking is a difficult, if not impossible, crime to quantify with precision. Traffickers operate in the shadows, and the tools they use to exploit victims are such that the victims themselves often do not know that what is happening to them is against the law.

Force, Fraud and Coercion

To be considered human trafficking, a situation must include one of the following:[7]

- **Force:** Violence or the threat of violence.
- **Fraud:** Deceitful recruitment practices, fraudulent debt accumulation.
- **Coercion:** Emotional manipulation, document confiscation, threats of law enforcement, deportation, exposure and shaming, consequences to family members.

Both sex and labor trafficking can happen in illicit massage businesses. As explored in greater depth later in this report, cultural shame combined with elements of force, fraud, and coercion — the very elements that make up the crime of trafficking — often lead women arrested at illicit massage businesses to insist to police that they are performing commercial sex acts of their own free will. Even when law enforcement is familiar with this type of trafficking and prepared for this answer from potential victims, it can be very difficult for victims to speak about sex or sexual exploitation at all.

Victims are much more likely to share information about labor exploitation they have experienced. For example, in a recent raid of two massage parlors in Waco, Texas, where police had been offered commercial sex acts, the three victims spoke in terms of work,[8] not sex. They disclosed that they were not aware of the type of work they would be performing until they arrived at the business. They reported being housed in the parlor by traffickers to "save money" and were charged $300 per month to stay there. They were allowed to keep 20 percent of their earnings, but had to give the boss their whole first week's pay as a "deposit."[9]

The unlikelihood that women will self-identify as victims of sex trafficking deeply skews the public impression of how many women are trafficked in these venues, as trafficked women who do not self-identify are often reported as "prostitutes." It also makes it very difficult for researchers to estimate the total number of victims of sex and labor trafficking in these venues.

What we do know with a high degree of certainty is that labor trafficking is pervasive. Across calls to the NHTH hotline, conversations with dozens of service providers and legislators, and officials from over 100 law enforcement agencies, we have yet to hear of an IMB case that did not involve labor trafficking. Labor trafficking in IMBs takes the form of business owners coercing women into commercial activity without adequate payment — or any payment at all. They may be forced to endure illegal or exploitative conditions — long hours a day, seven days a week, without provision of any required benefits or employee protections — and made to believe these are in fact normal working conditions in the United States, thereby adding the elements of fraud and coercion.

↑ Massage parlor in mall, McAllen, TX

Marketing Illicit Massage Businesses to Buyers

Illicit massage businesses are designed specifically to provide the comfort of a built-in cover story for buyers — that they just "wanted a massage" and had no idea that this business offered any other services. This creates a psychological comfort zone as well as a very real one.

Buyers at illicit massage businesses are rarely targeted by law enforcement, and are rarely shamed, or even talked about, in the media.[10]

It is very likely that without the availability of such businesses, this particular subset of risk-averse commercial sex buyers would remove themselves from the commercial sex marketplace.

Ads from the Massage section of Backpage in Chicago[11]

HOT Asian Massage Healing and Relaxation Open12 hours10 am-10pm

*** Hot and Beautiful Chinese Massage****(Downtown Chicago) (Downtown Chicago)

GRAND OPENING COMFORT SPA!!! New Ownership~ New Masseuse~ New Faces~ (6417 North Ave. Oak Park, IL 60302)

Professional massage in Uptown, Chicago(Wrigleyville area) (Chicago(Uptown))

Lucky foot spa (485 S weber Rd Bolingbrook IL 60490)

HIGH QUALITY PROFESSIONAL ASIAN MASSAGE Minooka / JOLIET (W Mondamin St

♥♥♥ Unforgettable Asian massage (Glen Ellyn) (565 Roosevelt Rd, Glen Ellyn, IL)

Best Massage in Bartlett (949 s route 59 Bartlett IL 60103)

Rose massage (2400 Caton Farm Rd crest hill IL 60403)

WaRm CuDDles and KIsses (TO ME-private-safe and discreet location)

European Magic Touch Massage (IN AND OUT CALLS!) (Northwest Suburbs)

Naperville Grand Opening H &F Spa — New mansgement— BEST massage 815-782-6826 (13717 US-30

****** Best Massage ****** (Schaumburg)

Brooke and SoFy, we aim to please (Armitage and Damen)

Pretty Sweet and Skillful Asian girl at SUNSHINE SPA best massage in town (PARK RIDGE,DES PLAINES,NILES,SKOKIE)

Massage spa Grand opening today $48 ★★★☎630-762-8886 (4260 Westbrook Dr suite 106 Aurora.IL)

NEW PIC ! ! NEW CRYSTAL SPA 708-503-0212

Online advertising and marketing

Buyers commonly find out about IMB locations via word-of-mouth or online,[12] where many advertise in the "massage" or "therapeutic" sections of classified ad sites like Backpage.com and Craigslist.

Review sites

Those looking for references or to ensure that these businesses are in fact selling commercial sex, not massages, can get some information about potential IMBs to visit from mainstream review sites like Yelp. For even more detail, there are IMB-specific online communities, or "review boards" such as RubMaps.com, usasexguide.com, MPReviews.com, aampmaps.com, and spahunters.com.

On these review boards, buyers share information about their experiences with the businesses, including details of which women provide which sex acts, how much to tip, reviews of their experiences, and ratings of the physical attributes of the women. Other aspects of the sites include advice on ways to, for example, pressure a woman for additional sexual activity than she is initially willing to provide. Unfortunately, the very existence of these review boards normalizes and empowers sex buying, giving buyers a sense of community and invincibility that feeds this harmful behavior.

RubMaps.com, the most popular of the national review boards, receives more than 325,000 estimated unique visitors per month. It catalogues more than 7,200 open and active illicit massage businesses around the country, allowing paid subscribers to search by state and city.

↑ RubMaps.com, the most popular of the national review boards by web traffic, receives more than 325,000 estimated unique visitors per month.[13] It catalogues more than 7,200 open and active illicit massage businesses around the country, allowing paid subscribers to search by state and city.[14]

The Advanced Search function on the RubMaps website.[15]

Review details

Age	Kitty	Breast size	Ass-play	Breast-Play
--Select--	--Select--	--Select--	--Select--	--Select--
Handjob	**Blowjob**	**Kissing**	**FS**	**Lick The Pussy**
--Select--	--Select--	--Select--	--Select--	--Select--
Finger The Pussy	**Hair Length**	**Build**	**Ass Rating**	**Extra tip**
--Select--	--Select--	--Select--	--Select--	--Select--
Prostate Massage	**Date added**			
--Select--	--Select--			

Search

↓ **Below is a typical review from a buyer.[16]**

> I've been here a couple of times and had a few different girls. This time was Anna. I liked her a lot and was happy to have her. The place is clean and the tables are high quality so i like it. Anna took me back to the rooms and let me get naked by myself and ready for her. She came and started working on me. She gives a good massage but she doesn't like touching that much. She seemed to shy away from my hands a lot. No problem. On the flip I made sure she knew I wanted to leave happy and she didn't seem to mind. Anna is a trooper and got to work on my prick immidiately. I was really really happy with her work though I would like more next time. I am hoping if I go back a few times I could get some mouth action. I'll keep tryin.

A subset of the population of IMB sex buyers who spend time on sites like RubMaps style themselves as **"hobbyists"** or **"mongers."** They consider themselves connoisseurs of purchasing sex from these venues and tend to be repeat customers at the same IMBs.

These "mongers" are well aware of the pattern of massage parlors being shut down by the police, only to open up later under a different name, with a new owner. In a recent blog post, one RubMaps user shared the following advice with buyers:

"Mongo is here to offer some options when this happens to you. These places tend to re-open. They will be under a different name, with a different owner. But most will still be offering the same services as before. Wait it out for a few weeks. Then come on here and see what other people are saying. The board has pretty good chatter from fellow mongers about the latest update in each city. Remember you are not alone. There are others in the same exact situation as you. If you can't or won't wait, then check out the scene in the nearby cities. You might discover a hidden gem. So in conclusion, it's ok; no need to panic. Shit is going to happen, but they will never completely close every shop. Where there is a demand, there will always be a supply. Monger on brothers, monger on."[17]

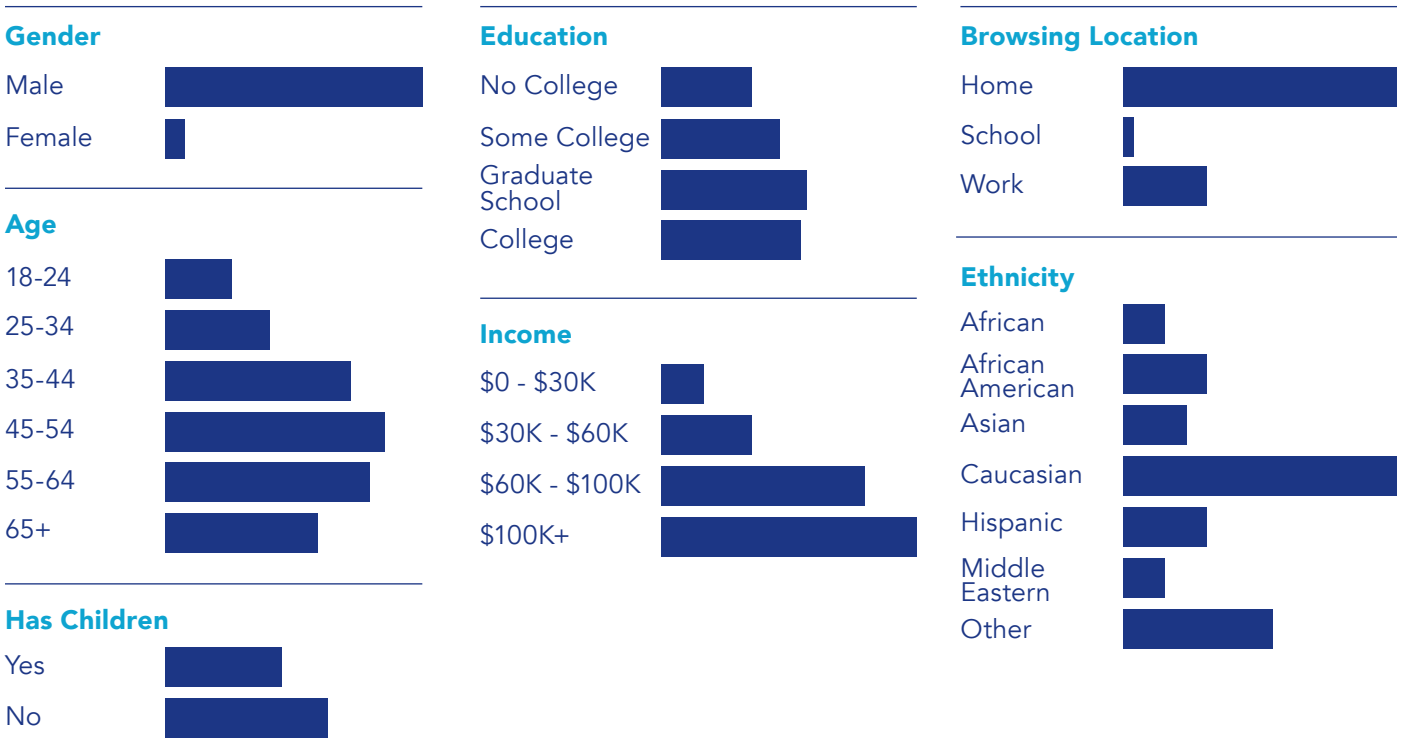
Buyer demographics

When buyers are arrested, the media often highlights those that have what are considered reliable, or even well-respected careers. For example, in a recent demand sting in Seattle, arrested sex buyers mentioned by the media included "two bus drivers, six architects, dozens of technology employees, construction workers, two surgeons, a dentist, a nurse, a journalist, a couple of attorneys, an executive with a sports-management company and an aspiring law-enforcement officer."[18] While these professionals are more likely to be mentioned in news articles, they are not the only members of the community partaking in this illicit activity. IMB buyers generally reflect the demographics of their communities, and therefore come from all walks of life.

To get a snapshot of the average IMB buyer who is active online, we took a look at page-visitor information for the most popular IMB buyer review board, RubMaps.

The average buyer participating in this online review board skews significantly more Caucasian, wealthier, and older than the general internet population.[20] While RubMaps is just one of many online review boards and is not representative of all buyers online, these demographics to provide a sense of the voices most represented by the RubMaps reviews analyzed for this report.

↓ **RubMaps.com Audience Demographics from Alexa.com[19]**



Buyer purchasing patterns

Recent research on buyer habits in the city of Houston, Texas found roughly 2,869 customers per day at the city's 292 illicit massage businesses, yielding a total annual gross revenue of $107 million.[21] These figures are based on identification of IMB sites through placement of cameras on public property outside 32 of them for a 24-hour period on random days of the week to gather information on how many people walked through the door, at what time, and how long they stayed. The research team found that the highest demand was during the lunch hour, from 12-2 p.m., and that the average IMB in Houston had 12 customers per day.

↓ Unmarked massage parlor in Philadelphia

Recruiting Women Into Illicit Massage Parlor Trafficking

Most immigrants come to America seeking jobs in a country that is thought to reward those willing to work hard and sacrifice. The women recruited into illicit massage parlors are no different.

Traffickers exploit cultural patterns, financial vulnerabilities

The vast majority of women reported to have been trafficked in IMBs are from China, with a relatively high number coming from the Fujian province. The next highest group are women from South Korea. There is a notable minority of IMBs that have victims from Thailand or Vietnam.[22] The average age of victims in IMBs is 35-55, although we have also seen cases of trafficking victims in their late 20s and women all the way up to their late 60s. Most women recruited have no more than a high school education and know very little or no English when they arrive in the United States.[23]

China

South Korea

Thailand & Vietnam

High School Education

~ **35-55** years of age

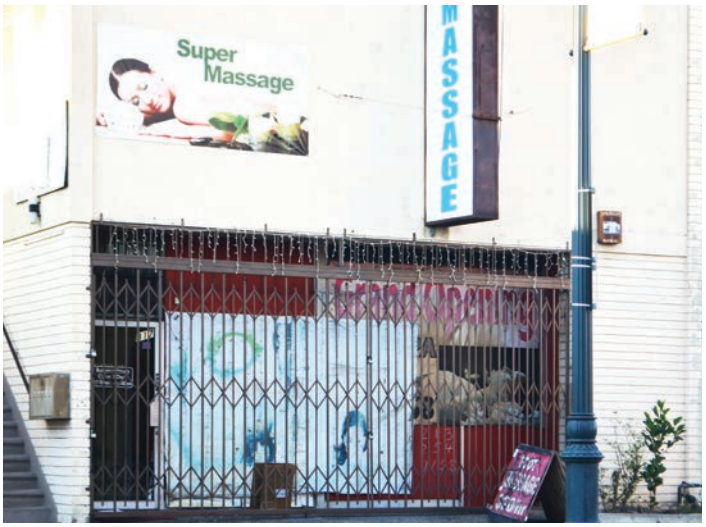
Know Little or No English

Financial need, combined with cultural patterns that traffickers can easily take advantage of in an unfamiliar environment are among the most common vulnerabilities shared by IMB trafficking victims[24,25]. The women who get recruited to IMBs begin their journeys to America with limited or no financial resources, usually arriving on tourist visas.

The Visa Waiver Program allows Korean citizens to travel to the United States for business or tourism for up to 90 days without the normally required B-1/B-2 visa.[26] However, for potential trafficking victims from non-visa-waiver countries, including China, the barrier to entry is far higher. To obtain a B-1/B-2 visa, Chinese citizens must prove that the purpose of their trip is for a temporary business, pleasure, or medical visit, provide evidence of funds to cover their expenses while in the country, and show evidence of a residence outside the United States or other binding ties that will ensure their return to China.[27]

Women in already precarious financial situations are often lured into hiring expensive brokers to handle the visa process (often fraudulently) and arrange plane tickets and associated fees. To pay the broker, women take out loans ranging from $5,000 to $40,000 depending on the route and travel methods, and the broker used.[28] For traffickers, this visa process is an access point for recruitment. They may provide false supporting documents such as job offers, and offer coaching and guidance to help women make it through their visa interview and immigration process smoothly. However, these "services" help create indebtedness and may also end with victims handing over their immigration documents and passports to their traffickers, giving them additional leverage and control.[29] Whether recruiters are directly involved in the visa and travel process or not, they are well aware of the financial burdens that potential victims carry as a result.

Recruiters also know that recent immigrants are likely to seek advice and support from extended community networks.[30] In a socially-oriented and collectivist culture like China's, social affiliations are often "satisfied within already established groups," which encourages seeking support from existing relationships. That inherent trust and reliance on the group is complemented by a "social obligation to help others who need help in the social group to which they belong."[31] This cultural tendency is reinforced by the historical experience of Asian immigrants in the United States. The Chinatowns that developed in major cities as a result of anti-Chinese sentiment and policies in the mid-nineteenth century continue to serve as strong and often somewhat insular community centers.[32]



↑ Storefront massage parlor, Los Angeles, CA

This cultural practice extending into communities within the United States is explained by survivors as the reason they look within their community (often defined as narrowly as fellow immigrants from their shared village in China) for job leads. By tapping into these existing communities, traffickers can easily recruit victims due to the high level of initial trust in recommendations from these sources, based on traditional use of relationships for professional, social and organizational levels. Safe Center Long Island, for example, reported the experience of one survivor who was offered a job in a massage business in Florida by a woman from her village:

> *"I was persuaded by my villager to work for her in Florida. She was nice and said it is a great opportunity to make money as they have an influx of customers. I know nothing about Florida but I trust her as she is from my village in China. When I paid my own plane ticket and got to her massage parlor, she asked me to deliver sex services to clients. I rejected the request as it was not what I was told on the phone. She slammed the table and changed her attitude 180 degrees."*[33]

While in this case, the survivor resisted initially, deeply ingrained behavioral and social patterns in Chinese culture create intense pressure for immigrants in situations where they may owe others.

For example, one of the key guiding principles for social interactions in Chinese culture is the term *renqing*, which sets the social norms all members of society should follow in order to secure social harmony. This term emphasizes solidarity and empathy, while at the same time attributing a positive value to the obligation of reciprocation or repayment, by placing "heavy stress on the practice of such maxims as 'Do not forget what other people have done for you.'"[34] This maxim can apply to direct help such as a loan that must be paid back in any way possible or it can take the form of subtle coercion from traffickers. If a trafficker is able to convince a victim that he or she has done her an extreme favor by employing her — because she has limited education, does not speak the language, is told she is worthless, could not find work elsewhere, etc. —

then anything the trafficker asks of the victim should be done because she owes the trafficker so much. This kind of coercion and manipulation is similar to how American pimps groom and control young women, but in this case can be even more deeply embedded because of *renqing*.[35]

Peiyi Woo, a former counselor at Restore NYC, which provides services to IMB survivors in New York, explains:

> *"There is an implicit expectation that renqing must be returned in kind someday to maintain guanxi [or face/honor]. It is a double-edged sword that is both a collective virtue, yet a belief that can put the women in a vulnerable position. The community and social network is core to all activities of the Chinese people. Traffickers utilize the strength of the Chinese network that has the capability to shame and ostracize, as well as the pressure of not being able to repay their debts, as tactics to coerce women to do work that is different from advertised."*[36]

↑ Spa in strip mall, Tampa, FL

Another guiding principle of Chinese social interactions is the concept of *mianzi*, which refers to "an individual's social position or prestige," defined by their success in "performing one or more specific social roles that were recognized by others." Some of the ways in which this manifests in Chinese behavior includes respect for authority and a proclivity to seek to be of utility to one's social group instead of acting in one's own self-interest.[37] This is another social virtue that can often serve traffickers who are able to exploit their position of power within IMBs. A common way for law enforcement and service providers to make connections with a potential victim is to ask what her individual needs are. For Americans, this shows that we care and recognize the value of an individual. However, when placed against *mianzi* it can be seen as betraying your role within the group or abandoning the group altogether. This makes it very difficult for a potential victim to want to blame her trafficker or those associated with the network, who are usually perceived to be in positions of authority and power.

How traffickers recruit through fraudulent advertisements

In part through the exploitation of these cultural social constructs, trafficking networks direct women to specific jobs or newspapers, classified websites that function as community bulletin boards, social media, and traditional community-based newspapers. The ads posted on these channels are tailored by the traffickers to contain language that conveys unrealistic opportunity, but that to someone inexperienced in common labor practices in the United States, does not seem odd.

For example, a victim might be told that she can earn $7,000 a month at a massage business in Ohio and that the owner will arrange her transportation and living arrangements. This is in many ways ideal for someone looking for economic opportunity in a foreign country. The victims might not realize that accepting this job can lead to finding themselves in an unfamiliar city, with no way to return home, living on-site in the IMB or transported to and from the IMB and a trafficker-controlled residence (usually an apartment), by a driver in the trafficking network.[38] To a more trained eye, or even to those familiar with labor customs in the U.S., suspicious ads are easier to identify, which is another reason why traffickers target foreign women.

Some common indicators of fraud in Mandarin- and Korean-language recruitment ads include:[39]

High wages and cash paid daily. Recruiters often promise 2-3 times what a typical employee in that role would make.

Easy and reassuring working experience. One ad targeting Korean women promised "Facing hard/unfair situations while working alone at an unfamiliar place — we know it's the worst. We will be your oppa (older brother) and family while you are staying in LA."[40]

Provision of all the services 'from A to Z'. Recruiters often promise to take care of everything — plane tickets, visas, housing and transportation. The most common refrain is for the victims not to worry, that things like a lack of papers (visa, massage license, apartment lease, etc.) will not be a problem.

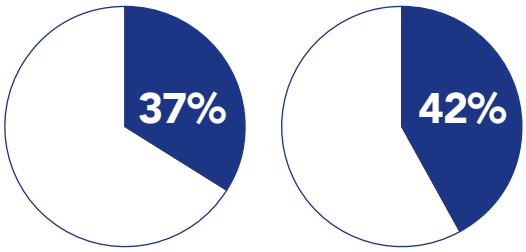
Guarantee of an easy licensing process to legally work as a therapist. IMBs often have connections to fraudulent massage schools that operate as "diploma mills." These are "schools" that will, for a high fee, provide a fraudulent diploma so that a woman can sit for her licensing exam without any formal training. Some schools will also provide a fraudulent diploma and a list of anticipated answers for the licensing exam. Others will simply provide a fraudulent or forged license and tell a woman she is now licensed to perform massages. In New York, women are frequently given temporary cosmetology licenses and told that this is sufficient to start their job as a massage therapist. This can also serve as an indicator during IMB site investigations, as the women might all have licenses from the same school, possibly issued on the same day and under the same individual's name.

Details of recruitment in classified ads

We analyzed more than 17,500 Mandarin-language website ads[41] fraudulently recruiting women into jobs within massage establishments in three port cities: Flushing, N.Y.; San Francisco; and Los Angeles.[42]

From this review, we found that 37 percent of the ads in New York, and 42 percent of the ads in California show one or more flags of trafficking (most commonly promises of more than $4,000 income a month, housing and transportation provided, visas handled, or parameters around an applicant's appearance or age).

Ads That Show One or More Flags of Trafficking



Across both New York and California, about 15 percent of the ads included a phone number connected to online commercial sex ads.

About 8 percent of the recruitment ads explicitly promised that no sex is required for the job, but almost double that number had ads that could be directly linked to commercial sex websites like Rubmaps.com or Spahunters.com. It is important to note that the connection to commercial sex ads or websites demonstrates that the job ads are inherently fraudulent, meeting the standard of "force, fraud, or coercion" necessary to prove human trafficking.

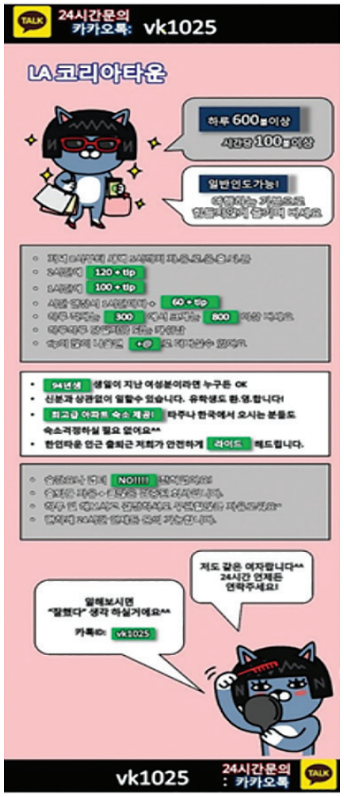
After jobs actually located in New York and California, the next most frequent type of job posting we found was for transfer to a location in Florida. This is a common pattern of movement within IMB networks that recruit women through major port cities like New York City and Los Angeles and then transport them around the country to smaller cities and towns.

We also analyzed recruitment ads from Korean-language websites. Unfortunately, Korean websites are city-specific, whereas the Mandarin-language websites recruit for the whole country, so the sample size was more limited. We analyzed 325 Korean language ads in Los Angeles and San Francisco, which had the most prolific recruitment websites.

In these ads, similar patterns exist among Korean recruiters and Korean-based websites. On a major community website, Korean Community of San Francisco (sfkorean.com), we found recruitment ads linking to a variety of other cities including Atlanta, Chicago, Las Vegas, Los Angeles, New York City, Seattle, Washington, D.C. and various suburbs in Northern Virginia.

Details of recruitment through social media

Recruiters also make use of social media platforms like WeChat and KaKaoTalk, the two most popular social media platforms for Chinese and Korean users, respectively. WeChat can be a difficult platform to understand for those more used to using multiple individual apps like Facebook, Venmo, and Google Suite. The apps in WeChat are all connected and powered by a centralized system with a single user log-in. With WeChat, users have a one-stop shop app that can do everything from search for jobs and transportation, order deliveries, do their banking, handle health services, and find media and entertainment.[43] In order to understand WeChat, picture all the apps on your phone and then imagine them combined into one single app — that is WeChat.



↑ KakaoTalk recruitment ad[44, 45]

KaKaoTalk is more similar to Google Suites. It has a similar range of apps as offered by WeChat, but they tend to be multiple apps under one system, rather than one all-encompassing app. KaKaoTalk is also similar to WeChat, but slightly more restricted in terms of privacy and the ability to easily find other app users in your region.

This means that with KakaoTalk, traffickers must create ads to attract potential victims.

Rough Translation of Key Phrases from a Recruitment Website

- "$600 per day, $100 per hour"
- From 8 p.m. to 5 a.m., free working hours
  - –For 2 hours, $120+tip
  - –For 1 hour, $100+tip
  - –For extra work, $60+tip per hour
  - –For one day, earn minimum $300 to maximum $800
- Same day paid "Cash-job"
- If you get more tips, you can earn '+@' than usual
- Any women born after 1994, OK
- Anyone can do it
- Premium apartment is provided
- Even people from other states or Korea don't need to worry about housing
- Commuting from the places near Korea town: we provide safe rides

Details of newspaper advertising

Traffickers also place fraudulent ads in print and online newspapers. In our analysis of newspaper ads for massage therapists in New York and California, we found that 50 percent of the ads had phone numbers that were connected to commercial sex websites, including ads that promised no prostitution. This is 34 percentage points higher than the number of ads that were posted through online classified/job board websites. These phone numbers in the print and online newspapers also revealed connections to broader operational networks. In a search of one Chinese print newspaper in New York, 10 percent of the recruitment ads claimed they were recruiting women for jobs in New York, but when the phone numbers were analyzed, the businesses were found to be in Minnesota, Florida, and Washington state.

A similar ad[46] posted online promised that no sex would be required. The ad, which would appear in search results for someone who searched in Mandarin, roughly translates to:

But when the phone number is run through Google with English as the primary language ads and commercial sex websites appear for a business that is in Pennsylvania, but nearly 50 miles from Philadelphia, where the job is advertised to be. One buyer wrote in November 2017:

> *"Dropped my mother off [redacted] beauty salon then drove over to this place called Wawa to get her some snacks. Took them back for her and had some time to kill and since this place was in the vicinity I went to it. Parlor is clean enough and has a nice environment. Mamasan was nice enough and the girl I got was [redacted]. She was a MILF. [FURTHER CONTENT CENSORED DUE TO EXTREMELY GRAPHIC AND DEMEANING COMMENTARY]"*

If a woman did not check both Mandarin and English search results, she would think she was going to Philadelphia to work a safe massage job. Instead, she would find herself in an unknown town, potentially unsure how to return to New York City, expected to provide sex to customers.

↓

The current position: -> Recruitment Job -> Massage please people

点击发布

2013-09-12 16:09:58

page views: 189 times

Title:	massage please people
content:	Philadelphia regular shop, stable income, convenient transportation, sincere please technology, good temperament masseur, pornography free ask. Tel: [illegible]

Lin's Story*

Lin did not have the easiest life growing up in a Central province in China. Her family was poor and Lin dropped out of school at 16 to start working. She met her husband several years later. She moved to his village, luckily staying close to her parents, and continued to work hard to support her new family. After a year or so of marriage her husband became physically and verbally abusive. The abuse was bad enough that Lin tried to go to the police but they told her they did not like to intervene in private matters. Lin continued to endure her husband for years but once her son was born she could not stand it anymore. She knew the police would not intervene so she chose a different route – divorce.

It took Lin some time but she finally divorced her abusive husband. Lin wanted to be able to earn enough money to confidently put her son through school. A friend in her village introduced her to a group that arranged for a tourist visa, an airplane ticket, and travel to the airport. In order to afford all this, Lin borrowed $9,000 from her cousins.

Once in New York, Lin found an inexpensive room in a group house where a fellow tenant recommended working in massage. He showed her an advertisement in a local newspaper that promised women $5,000 a month. Lin was so excited when she connected to the business owners on WeChat and they said they needed workers. She had found a job in less than a week and one that could quickly pay back her loans.

When Lin arrived she was told in order to earn thatmuch money she would need to provide whatever the customer wanted. Lin wasn't sure what that meant but was eager to work. When the first customer arrived he acted just like her former husband – he hit her and yelled at her. Lin wasn't sure what he wanted until the customer made it clear he wanted sex. Lin reacted like she had whenever her husband abused her – she stayed quiet and still until the customer was done. At the end of the day Lin was told she could go home.[47] She had not earned any tips, so the owner told her she had not earned any money. Lin felt this was a shame to the family[48] and felt like she should have known what kind of place this would be. However, she needed to make money to pay back her debt and support her son back in China. Feeling ruined already and unsure of where else to go, she continued at this job.

Lin was told to report to work at different shifts – the business was open 24 hours a day and women were always on-site. Lin was able to keep some of the tips she earned to send back to pay off her loan for the month that she was at the business. She was very worried that her family might find out how she was able to send money back. Recently Lin learned from a friend in the business the WeChat ID of a woman at a place called Sanctuary for Families. They have been talking about Lin's rights in America and how they can help her.

**This story is a composite based on dozens of reports by survivors, service providers, and law enforcement officials.*

Why Don't They Just Leave?

How Traffickers Use Force, Fraud and Coercion to Control Women

A common misperception about human trafficking in all its forms is that it always or even frequently involves kidnapping or physical restraint. That form of extreme control over victims' liberty is rare in most trafficking situations, and illicit massage parlor trafficking is no different. The vast majority of women are trapped in massage parlors by powerful mental and emotional chains built of lies, shame, manipulation and terror.

> "The trafficking survivors from illicit massage businesses (IMBs) that I have worked with are often exploited in a … subtle way … The women can have multiple vulnerabilities, such as debt, unstable immigration status, language barriers, lack of knowledge of laws in the United States, low education, shame, and so on. These vulnerabilities compound and form a trap closely surrounding the women working in massage parlors."[49]
> — Beisi Huang, LMSW,
> Supervising Counselor at Restore NYC

But physical conditions do play a significant role in strengthening traffickers' hands. Daily life in an IMB is physically grueling. Women are usually forced to live on-site or in housing provided by the trafficker — usually in the form of a single apartment or house shared by several victims. If a woman lives on-site, she is usually expected to be on-call for buyers whenever an IMB is open — which is anywhere between 15 and 24 hours a day. The physical and mental toll this takes slowly breaks them down.

When victims live off-site, they are typically confined to their shared apartment and the IMB, and are transported between each location by drivers who are connected to their traffickers. Victims are further broken down by frequent moves between IMBs and to different cities and states.[50] This frequent rotation schedule is strategically advantageous for traffickers. Not only does it serve to provide buyers with "fresh" faces, it keeps the women disoriented and prevents them from forming bonds with each other. In one case in Texas, victims that testified estimated that 50-60 women were rotated through the business over the course of two years.[51]

On top of these abusive conditions, the traffickers layer high levels of psychological manipulation, compounding existing historical and cultural trauma that many victims have, and resulting in a situation that greatly reduces their willingness to self-identify as victims and seek help. One survivor from China shared with her caseworker a sentiment that most service providers consulted for this report said is expressed by survivors:

> *"My husband left me and there is no financial support. I have no other choice for I am a single mother without legal status. I have family relatives here but they just look down on me for my situation. I cannot tell anyone that I am doing sex work at a massage parlor. This is a shame to the family."*[52]

The level of shame experienced by IMB survivors is significantly higher than the shame seen in other types of sex trafficking.[53] Many Chinese and Korean survivors of IMB trafficking do not feel comfortable using the word "sex" when describing their experiences, preferring to say things like "the bad massage" or "the service" instead of "the place I was made to sell sex" or "the sex the buyer asked for."[54] Similarly, the term "victim of trafficking" does not often resonate with survivors. They might not be aware of its meaning, or they might simply feel that it does not describe their experience. Many trafficking survivors "tend to define themselves not as 'victims of trafficking' but simply as 'migrant workers who have had some bad luck as a result of a bad decisions or a bad contract.'"[55] This self-blame is common across trafficking types, in particular in victim populations from source countries that have less stringent labor rights protections and more limited economic opportunity than the United States.

This is why allowing investigations and outreach to be guided by victim self-identification is ineffective. For example, in the 2017 documentary, "Save My Seoul," which focuses on commercial brothels in South Korea, a police officer responds to questions around why the police are not helping victims, saying "Look, in this department our job is just to crack down on prostitution. We'd do our job if there were victims.[56] Why would they call the police if they're choosing to do this? You can't call them victims." Relying on the victims themselves to recognize and voice their trafficking situation makes the job of traffickers easier if all they have to do to keep law enforcement away is use shame and fear to prevent the women from seeking help.

How victims are controlled

Traffickers also utilize historical trauma. Since women trafficked in IMBs are typically between 35 and 55, they either directly experienced the Cultural Revolution (for older women), or their parents were impacted by it and that experience was part of their upbringing. The Cultural Revolution was a period of intense violence and upheaval that took place in China from 1966 until 1976. The stated goal of the Revolution was to preserve Communist ideology in the country by purging remnants of capitalist and traditional elements from Chinese society, and to re-impose Maoist thought as the dominant ideology. This period was preceded by the Great Leap Forward, during which time 45 million people died of starvation over three years.[57]

In a psychoanalytic study, conducted as a partnership between the Sigmund-Freud-Institut in Frankfurt, Germany, and five Chinese professors from different universities, on how the Cultural Revolution affected people, researchers found that the trauma did not begin with the Revolution. The generation before experienced deep poverty, family separation, and traumatic childhoods. The generation that experienced the Cultural Revolution experienced deep psychological trauma from fear, abuse and physical violence. All of this has led to intergenerational trauma which "considerably impaired their ability to experience and establish good relationships, to develop well delimited egos with secure self control. The deficits [particularly of the generation that were children during the Cultural Revolution] were caused by the suffering of parents' trauma and by identification."[58] This makes women, particularly those that are older, especially susceptible to threats of violence, manipulation, and fear of government officials.[59]

Controlling the money: Debt bondage and wage labor violations

As discussed earlier, debt, whether accrued in the country of origin or in the United States, is one of the strongest methods of initial control that traffickers possess. In a 2006 case involving a massive sex trafficking network based in New York and stretching from Rhode Island to Virginia, debt bondage was a key component of control. The women in this case were recruited in Korea with promises that they would be able to work to financially support their family, but once they arrived in the United States, they were informed about their debt and forced into prostitution in order to pay it off.[60] In other cases, women have already accumulated debt of their own that, while it is unaffiliated with their eventual trafficker, creates an urgent demand victims must meet, and thus a vulnerability traffickers are able to abuse.

Labor Violations in IMBs

IMBs violate labor laws in all 50 states by paying women in tips alone with no guaranteed hourly wage. Additionally, the women do not have a set schedule, but instead are always on call. They are not allowed to set any boundaries, and are forced to do whatever the buyer or manager asks without regard for comfort level. Their housing, and travel to and from the business, are typically also controlled, contributing to a lack of personal boundaries.

Most IMBs quote a very low price for a massage (around $40), all of which is kept by the business, and buyers understand that they will be expected to give a significant tip for sex acts ($60-120 depending on the act) to the individual women. If the women refuse to provide sexual acts, or if the buyer refuses to tip, the women earn nothing.[61] Knowing that the women are under pressure to earn money, the managers coercively say that the choice to provide sex acts is "up to her," manipulating her understanding of "choice" and controlling what she might say to law enforcement if questioned. This is a common form of coercion used to control victims across all 25 types of trafficking.

The survivors sometimes keep the tips they are given, but often they pull from those tips to pay off house fees, living expenses, and other accumulated debts. Even under such conditions, paying down a static debt might seem achievable. However, many of the more coercive traffickers compound the debt by charging exorbitant fees for everything from food, to errands, to transportation, and even for the "privilege" of avoiding aggressive and dangerous buyers.

Crushed by Debt

Existing Debt
Arrive with debt-related vulnerabilities
- Debt accrued in home country
- Debt related to travel to the U.S.

New Debt
Massage parlor brings debt, no guaranteed wage
- Fees charged by traffickers (e.g. rent, groceries, condoms)
- Emergencies: bail/attorney fees

Controlling through fear, threats and lies about the United States

Managers also charge women for breaking house rules like "don't leave doors open" and "only eat certain foods" and even make women responsible for any money lost during a robbery, which contributes to an environment of control and climate of fear.

Managers also control women's access to their money, by offering to open bank accounts to "hold" it for "safe-keeping." The women may initially perceive this gesture as a caring favor, but it cuts them off from any visibility into, or control of, their finances.

How Debt Accrues

- Travel or smuggling fees
- House fees
  - –Hygiene products like soap, shampoo, or toothbrushes
  - –Safety products like condoms
  - –Groceries or takeout food
- Rent — for living on-site or in the case of multiple women living in small apartments
- Fees for breaking rules
- Fees for avoiding "bad" buyers
- Attorney and bail costs
- Traffickers may provide interpreters or advocates to represent women during law enforcement operations. Women are charged for such services and are prevented from openly speaking to law enforcement

Women in illicit massage businesses are isolated and provided with distorted information about business laws, human rights, legal rights, and cultural norms in the United States. For example, they are often told that there is only one kind of massage in the United States, implying that commercial sex is "normal" and they should expect no civil or criminal protections. Because most trafficked women are undocumented, they have intense fear around being deported, making immigration threats an extremely effective form of coercion. As an additional layer of control, traffickers often hold victims' identification and immigration documents in a separate location. Law enforcement and service providers from central California to Florida have reported that upon leaving an IMB, women have expressed an urgent need to return to one of the main ports of entry into the United States (the Flushing neighborhood of New York City's Queens borough, Los Angeles, and sometimes San Francisco). Their reason is because a "friend" there is still holding their official documents. This is a form of control that makes it difficult for the women to avoid being re-trafficked, as they must contact someone in the trafficking network to obtain their documents.

Traffickers also work to make sure the women look to police not as a source of help, but as indifferent at best, and a threat at worst. They do this by taking advantage of the women's experience with police in their home countries, which includes both indifference and widespread corruption. In China, one in four women has experienced domestic violence, and most do not expect or receive assistance from the police.[62] Although China has strengthened its domestic violence laws, many, including those in law enforcement, allow domestic violence to go unreported because it is seen as a matter of shame and embarrassment to members of local communities. Social order is often left up to neighborhood committees, community leaders, and village elders who choose to "filter" out these types of culturally shameful crimes from official records.[63] This produces a distorted view about crime and victimization in China that impedes Chinese women from easily identifying themselves as victims while at the same time discouraging reliance on law enforcement.[64] This form of informal social control is strongly tied to the foundation of the People's Republic of China in 1949, in which Mao Zedong called his followers to "smash the police and the courts" in an effort to get rid of bureaucratic agencies.[65] Furthermore, corrupt law enforcement officers in China are known to aid the operations of criminal groups and are therefore often viewed as part of their criminal networks.[66] When Chinese women find themselves trapped in another cycle of abuse, via IMB trafficking in the United States, they transfer this perception of police indifference to their new situation, and traffickers know to exploit it.

Many Chinese and South Korean women also bring with them a cultural unfamiliarity for and thus discomfort with hotlines, which are an uncommon process or resource in many populations around the world.[67] Instead of a source of help, many view hotlines as a way for the government to collect information.[68] For the above reasons, they may not think of calling about something as personal and private as sex trafficking, no matter how accessible the hotline number and access to a phone may be.[69]

To underline women's sense of vulnerability in a foreign country, traffickers have a practice of forcibly removing women who refuse commercial sex (e.g., a woman may be kicked out on the street with no possessions at 3 a.m.) serving as a threatening example to the other women witnessing it. Additionally, when the victims are arrested for engaging in prostitution, traffickers often report the women to Immigration and Customs Enforcement in hopes that they will be detained and deported before exposing their exploiters. This manipulation of the systems by the traffickers reinforces for the remaining victims that the traffickers can in fact control their fates.

Physical control

Physical violence is not as frequently used by IMBs to control women as in other types of trafficking, but violence against IMB victims from customers plays a role in other forms of coercion and control. Buyers may commit acts of violence including sexual assault, rape, punching, slapping, and assault with weapons or fire (e.g. lit cigarettes), and insist on not using a condom.[70]

Women are under constant pressure to please the buyer to increase the likelihood of a tip, and decrease the likelihood the buyer may report displeasure to the manager who may punish the women for poor performance. They may also hear stories of violence suffered at other IMBs, such as the story of a woman stabbed to death by a buyer[71] or the rumors of women burned by cigarettes by sadistic buyers.[72] Many women become convinced if they just do what the customer wants, they will not be hurt and they may have a chance at paying off their debt. They understand that displeasing any customer is a risk to their "sisters" in the IMB, as all may be arrested or deported if the buyer reports it.

Managers underscore this way of thinking by consistently siding with the buyer, asking "why wasn't he pleased?" Managers monitor the customer reviews on sites like RubMaps, ready to punish any woman receiving bad reviews from unhappy buyers by forcing them to accept dangerous buyers.

Surveillance control

Traffickers often use Closed Circuit Television (CCTV) cameras to control women's actions inside IMBs, creating the feeling that they are always watched. In some cases, the traffickers threaten to show the videos or photos to the victims' families back in South Korea or China.[73] Other times managers are watching the cameras from a separate, off-site location, and call the women periodically to make clear they know they are being watched.

Jiao's Story*

Jiao arrived in New York City in November 2016. She had recently lost her job in China and hoped she could find work in America. People from her village had come to New York and were able to make $1,500 in just one month in jobs like washing dishes.[74] In the first week, Jiao joined a WeChat group of people from her village. One of the members, Yu, said she needed someone to work in her massage business in Florida. Yu told Jiao she would first need to go get her license. Jiao was told what bus line would take her to the school in Florida that would train her so she could get her license within a week. Yu told her not to worry and even contacted her family through WeChat to let them know she had found a job and was alright in America.

Once she was in Florida and had received her license, a man arrived and said Yu had sent him to take Jiao to the business. Once at the business, Jiao received additional WeChat messages. Yu said that Jiao owed her for her bus ride, school, and for housing (which was a very small room in the back of the business). To begin paying her debt, Jiao was told that she would have to do whatever the customers wanted in order to earn tips. Jiao was told if she refused, Yu would call the police to have her deported.

Jiao was instructed to put the house fee the customers paid into a safe, along with the tip money she owed against her debt. If Jiao needed any food, toiletries, or medicine, she was to chat Yu and request them. Yu would then add the costs of those items to her debt. Jiao had no idea where in Florida she was or how to get around the community. She depended on Yu for everything.

One time, Jiao put $20 in her purse rather than the safe. She hoped maybe she could save enough money to find a way back to New York. Immediately, she received a WeChat message. Yu had cameras in every room and saw her try to keep the money. Yu told her if she did that again, she would take the videos she had recorded of Jiao and send them to her family. Jiao was terrified that Yu could see and hear everything she was doing. She knew that if she ever disobeyed, Yu would make sure she could never go home.[75]

When the police came, Jiao was sure that anything she told them would get back to Yu. Luckily, the police were working with service providers that were familiar with Yu's style of control. They took Jiao to a separate location while the police collected evidence. With the help of a trauma-trained Mandarin interpreter, the service providers made sure Jiao felt safe and explained how they could help her. It took several hours, but Jiao trusted that the service providers understood what she had experienced and was relieved that they treated her without judgement. Jiao has returned to New York and is working with the police and service providers who helped her to make sure Yu receives justice.

**This story is a composite based on dozens of reports by survivors, service providers, and law enforcement officials.*

Cultural coercion

A common coercive tactic traffickers use across many types of trafficking is the creation of a sense of family within the group of victims and exploiters. This is effective not only because of the false sense of support it initially conveys, but also because in the traditional Chinese family, all members are expected to contribute all their income to the family treasury, which is then collectively used.[76] If the trafficker successfully creates this familial environment, it then becomes easier to control the victims' money, and then slowly escalate to controlling other aspects of their lives. In this collective view of a pseudo family, the victims' actions carry consequences and benefits for the group beyond themselves and can be a powerful tool for psychological coercion by traffickers. For example, if a victim defies the trafficker, instead of punishing the victim, the trafficker might punish others in the group as a form of punishment often perceived as worse than if the trafficker would have punished the victim directly. This form of control is heightened in IMB trafficking, where the cultural background of the victims deems "family as the most important primary group to an individual," and includes concepts of equality that dictate "profits or losses be distributed equally."[77]

This group dynamic is often accompanied by the appreciation of hierarchical and social status that is culturally embedded for women coming from China and Korea.[78] There is an ingrained deference to elders and to people from a higher social class. Trafficking operatives will reinforce this by using aliases such as "Big" or "Older Sister."[79] This reinforces a family mentality, while allowing operatives to keep victims from knowing their given names in case a victim ever speaks to law enforcement.[80]

Traffickers overwhelmingly rely on these cultural social constructs to achieve their goals. Restore NYC, a service provider in New York, shared this recent case that highlights this experience common for survivors across the country:

> *"The boss pretended to be a "big sister" to the [victim], communicating to her that we all have to do what is "necessary" for family and their benefit. This hit the heart of the client, and she felt immediately connected to the boss because the boss "understood" her situation and why she was in this country. The client no longer felt "alone." The boss further won her trust by providing free transportation from where she lived to the workplace. This is just a recent example of the trust building process, that ultimately the boss used to deceive and coerce the client into providing sex services. This parlor was raided by law enforcement, and the client was referred to Restore, where shortly after, we identified her as a survivor."*[81]

This form of control through doing "favors" may include arranging for defense attorneys or doing errands, like getting groceries, for the women. Even though these acts increase a victim's debt disproportionately, the acts are framed as the trafficking network taking care of them and helping them navigate the foreign systems, especially when they are outside familiar neighborhoods. These "favors" become manipulative acts to gain control over the women, facilitate their dependency, increase their debt, and keep the women believing that work in an IMB is their only option in the U.S. As one survivor said, "They led us to believe that we were family. But it was a lie."[82]

Illicit Massage Business Operations

While massage parlors may appear to be individual businesses, they are often part of larger organized crime networks, which participate in every aspect of the business, from recruitment to day-to-day management.[83] The key facets of these operations are linked businesses that allow for both economies of scale in the massage businesses and money laundering through the connected legal businesses. Generally, the day-to-day operations are managed by operatives within the networks, who rely on the transportation industry to recruit and transport victims, keep victims disoriented and isolated, provide buyers with new supply, and evade law enforcement. While traffickers have been known to use air travel to transport victims to IMBs, the most frequent modes of transportation include informal buses, taxis, and private drivers. In some cases, transportation is integrated entirely within the network, but traffickers also use public and private transportation systems that are not connected to their businesses.

↑ Spa in Chinatown, Flushing, NY

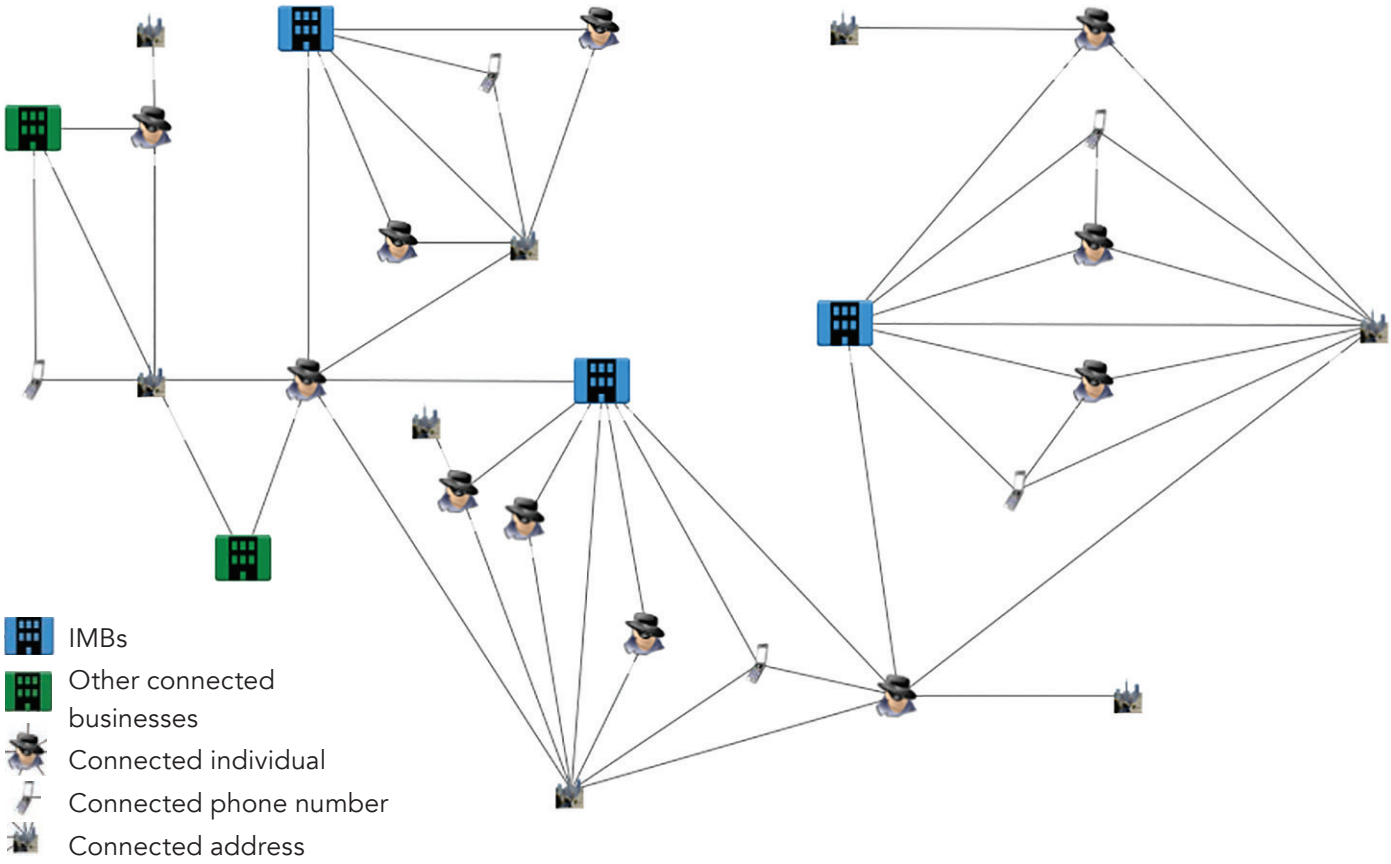
Networked business model and organized crime

The average illicit massage business connects to at least one other illicit massage business as well as non-massage venues such as nail salons, beauty shops, restaurants, grocery stores, and dry cleaners. Overwhelmingly, these connected businesses are used to launder money earned from the illicit massage business.

They may also be venues where labor exploitation and even labor trafficking occur. These networks often also include shell companies, which are used to obscure the identities of people profiting from the trafficking enterprises.[84]

Networks may be facilitated by groups within the United States or abroad. For example, ethnic Chinese crime groups rely on a broad criminal fraternity underpinned by traditional Chinese networking practices, that can broker contacts in any country where there is a large ethnic Chinese community.[85]

Polaris combined and analyzed data from a buyer review board with several open-source data sources, cross referencing identifiers such as phone numbers and business addresses to identify and map networks across the country.



Out of all the states we analyzed, California has the highest number of networked connections across the country. IMBs in California can be connected to every state in the country, except Vermont. This is likely because two out of the three main ports of entry for women trafficked into IMBs are Los Angeles and San Francisco. Women may be initially trafficked in these cities, or immediately funneled into networks across the country.

New York City is the number one port of entry on the East Coast. Although its networks connect to other states, it appears to be more of a starting point to other hubs throughout the country. From California and New York, women will often pass through other hub regions before being moved along networks. Some of the most prominent hubs are Los Angeles, San Jose, and San Francisco, California; Tampa and Miami, Florida; Chicago, Illinois; and Houston, and Dallas, Texas. Although a victim may start in one city, the scope of these networks means they will usually be moved around multiple cities and states. Identifying and shutting down the entire network is the best way to ensure traffickers cannot simply continue to earn profits in another area and build back up their network.

Case Study on Network Discovery

In 2017, a network including at least two businesses that were fronts for commercial sex, was uncovered in Dallas.[86] Jeffrey Wittman, 53, who was working as a finance manager at a car dealership, also owned two IMBs, Sakura Spa and The Palace, and a shell company called JBJ Services LLC.[87] JBJ Services LLC reportedly operated at the same location of Sakura Spa, and used the same phone number.

Jeffrey Wittman's wife and co-conspirator, Chin Young Song, is also listed on business records for JBJ Services LLC. Wittman and Song had married in 2013, and went into business the following month. It was a strategic partnership, since Song had accumulated "knowledge and expertise" from running IMBs in the Philadelphia area in the early 2000s. She had been convicted in 2008 in Philadelphia of federal racketeering charges related to prostitution.

Sakura Spa advertised "all new hot sexy beautiful international ladies waiting for you" on Backpage, saying "Hot and very friendly. You won't be disappointed." Sakura was open 24 hours a day, and the women trafficked there were "required to line up for each customer" so customers could choose one, "regardless of the time of day or night." The policy was that if a customer had at least $100, the women would have to provide sex upon request. The traffickers leased space for an ATM to operate inside the business to ensure customers had access to ample cash and could abide by their cash-only policy. The Palace operated similarly, and investigators found evidence of women living there, such as "a room full of beds, makeup, mirrors, and personal effects."

Management structure of illicit massage businesses

Roles in an IMB

Assembling a complete picture of traffickers in illicit massage businesses is a challenge. Within a single trafficking network, multiple people play different roles in creating and upholding a highly profitable and organized system. Some act on the fringes of a victim's experience. These can include network owners, who may never actually visit the property, or recruiters who help set up print and online ads. Others will be more directly involved with ensuring victim compliance and day-to-day logistics of running the IMBs. These include the manager (often referred to as "mamasan"), manager-in-training (someone who is still primarily selling sex but who has begun assisting management in controlling victims), and the taxi drivers who help rotate women between IMBs. Landlords, real estate agents, and even attorneys are often involved as well. The majority of network operatives are of Chinese or Korean nationality and reside either in the United States or serve as recruiters in China or South Korea.[88]

Individual networks are frequently managed by family members. This can either mean a husband and wife team running a network together, as in the case of Royal Spa in Huntsville, Alabama,[89] parents and adult children working together as they were in a network of five IMBs in Western Massachusetts,[90] or siblings, as in the case of a network in Ohio.[91]

While traffickers can be both men and women, the frontline controllers are overwhelmingly women, as are many of the owners. This can make law enforcement raids very challenging, as the potential victims and potential exploiters are both women. Men in the networks are more likely to be drivers, recruiters, or involved in managing operational logistics such as laundering money than to be the traffickers themselves. There are also cases of frequent buyers becoming traffickers. One of the most egregious cases of a buyer becoming a trafficker in recent years came from St. George, Utah.[92] This buyer purchased two massage parlors after visiting them regularly. He had been known to harass and assault the massage therapists as a buyer, which he continued to do after he purchased the businesses, as a means of force and intimidation.[93] Additional cases have been found across the United States, including in Seattle, where a buyer claimed he fell in love with a woman he frequently visited. He and the woman then opened two additional brothels and began to exploit and profit from women.[94]

Transportation and trafficking in illicit massage businesses

On average, traffickers rotate victims between IMBs every 2-6 weeks.[95] This practice of rotating victims through multiple IMBs is a common tactic traffickers use to maintain a fluid buyer market and exert control over victims. IMB network operations are highly mobile and transport victims within states, regions, and across the country. After entering the country through a main port city like New York, Los Angeles, or San Francisco, women are transported from coast to coast, South to Northeast, and across urban and rural areas alike.[96]

Min's Story*

Min came to Southern California from the Fujian province in China. She had dropped out of school in the 9th grade but had worked hard all her life. Her husband had always gambled and now had more debts than they could pay, so she came to visit a friend in the United States and look for work. She found an online ad for women to work as massage therapists near Los Angeles and was promised $6,000 a month with free housing. She took a bus to the location on the ad and was met by a driver. Min showed the driver the name of the business and the address she had been given. The driver then drove for some time to an apartment where two other women were staying. In the morning, a second driver came to pick everyone up to take them to the massage parlor. On her first day, Min was told that in order to earn the money she had promised her family, she would have to engage in commercial sex.

Min had no idea where she was or how to contact the first driver to get back to the bus station. Min stayed and when she was able, told her family everything was fine. Min was deeply ashamed this had happened and never wanted them to find out. Whenever she came close to asking a customer for help, her manager would threaten to call the police, who she said would deport her and tell her family how shameful she had been. Every few weeks, Min would be moved to a new apartment and new business. All she knew was that she was still somewhere near LA. Eventually, she wound up in a business that police were targeting. When they came to shut it down, they arrested the traffickers, not Min. The police then told Min she was actually in Illinois, nowhere near LA. The police helped connect Min with service providers in Illinois and then California. The service providers helped Min understand her rights and helped her enroll in English classes. Min is in the process of receiving her T visa and is now able to honestly tell her family that everything is fine.[97]

**This story is a composite based on dozens of reports by survivors, service providers, and law enforcement officials.*

Informal buses

Informal buses, often colloquially referred to as "Chinatown buses" (or "Dragon Buses" in the Chinese community) are localized bus lines that both serve the general public and also commonly — not necessarily knowingly — transport victims to large cities along the East and West coasts. The Chinatown bus industry started in 1997, catering mostly to Chinese immigrant restaurant workers living in New York City.[98] Chinatown buses are attractive because they cost less than other bus companies (e.g., Greyhound) and are convenient for Chinese immigrants who live in Chinatown areas. The use of Chinatown buses by trafficking operations has appeared in many cases across Polaris' dataset, including commonly being reported by service providers and law enforcement officers. In one publicly reported case, victims were transported by bus from New York City's Chinatown to be trafficked in D.C.'s Chinatown to an IMB in Annandale, Va.[99]

Like the Chinatown buses, many informal bus networks cater to underground employment agencies which, for a fee, match job seekers with openings in more than 40,000 Chinese restaurants in the United States. These agencies provide job-seekers with a slip of paper that includes the bus route, the specific bus, or even the driver's phone number, but no destination address.[100] The buses then stop at freeway off-ramps to discharge job seekers to their new bosses, who take them to work.

The discount buses are reportedly a prime location for recruiters attempting to recruit Chinese women on their way to low-paying restaurant jobs, into IMBs. These recruiters hand out business cards, fraudulently claiming to be offering relatively high-paying legitimate massage parlor jobs. They know it is a waiting game. Once the women realize how little they can earn in their grueling restaurant jobs, especially after they subtract payments for any debts owed, they will be more likely to show interest in the traffickers' offer. Women who are already falling behind in their debts are even more vulnerable, as they may be facing threats of violence against themselves and their families.[101]

Taxis and private drivers

Taxi companies are sometimes involved in the transport of buyers and victims, especially in large cities like Las Vegas. Taxi companies and their drivers can be indirectly or directly part of the trafficking network. Some taxi drivers, although not formally part of the trafficking network, receive commissions from IMB traffickers for recommending and transporting buyers to their IMBs.[102] More complicit and involved taxi drivers may work directly with traffickers and knowingly transport victims to other IMBs, or even directly to buyers. In an IMB network in San Francisco, a trafficker used his own underground taxi company to pick up arriving victims from the airport and shuttle the victims to and from the IMBs.[103] A network of underground taxi services and complicit drivers worked closely with the traffickers in this case, and even assisted in coordinating the victims' daily schedules.[104]

Traffickers are more likely to rely on personal vehicles or private drivers to transport victims to and from IMBs. This allows traffickers to maintain control over victims who must rely on their traffickers for transportation, allows drivers to double as guards to ensure victims do not escape and law enforcement is not contacted, and allows traffickers to maintain their own transportation schedules without having to rely on standard bus routes or make purchases that create a paper trail.[105] These drivers are often privy to the trafficking operation and can even be a trafficker's family member or spouse, as was discovered during the previously discussed Ohio trial, where two sisters ran the trafficking operation, and one of their husbands served as the driver.[106]

A Constantly Evolving Problem

The problem of human trafficking in illicit massage businesses is complex and constantly changing. There are undoubtedly layers to it that we do not fully recognize or understand, multiplied by the traffickers' ability to quickly adapt to pressure by finding new loopholes to exploit. We at Polaris are constantly striving to keep our work informed by survivors, law- and code-enforcement, and other agencies with first-hand experience with how the traffickers' methods are evolving.

In the second half of this report, we discuss concrete recommendations for taking a unified, collaborative approach to all of the major pressure points for illicit massage business trafficking as it exists now. Human traffickers thrive on loopholes and systemic inadequacies including: insufficient resources to facilitate long-term investigations, law enforcement efforts siloed within jurisdictional boundaries, insufficient staffing to enforce code and liquor laws, and a need for improved education about identifying red flags when resources are sufficient for those operations.

Traffickers are still ahead of us technologically and methodologically, but by identifying and engaging the right stakeholders, we're now approaching a serious tipping point. We strongly advocate approaching the recommendations enclosed in this report with an iterative, agile perspective. **As the traffickers change their methods, so must we.**

Section 2
Ending Human Trafficking in Illicit Massage Businesses

A Complex Problem Requires a Multifaceted Solution

The complexity of human trafficking in all its forms belies the possibility of an easy solution. Certainly law enforcement is always a part of it, but disrupting human trafficking is not simply a matter of beefing up law enforcement's ability to do things the way they have always been done. State, local and federal legislation and regulatory frameworks all play a role, as do concerted efforts to shift cultural norms around both commercial sex buying generally and massage parlors in particular. None of this is easy, but it is also not as unwieldy or amorphous as it may appear at first blush.

The finance industry's efforts to combat trafficking provide an inspiring example of how quickly these transformations can happen. Over the past few years, the finance industry has made a concerted effort to address how traffickers take advantage of banks, remittance services, and credit cards to facilitate illicit business, hide profits, and create the appearance that they are paying their employees.

For example, financial companies have become wise to how traffickers make frequent deposits just under daily fund limits to avoid detection, and how they spread their finances across multiple accounts and institutions, often requiring trafficking victims to open joint accounts to move illicit funds, and create the illusion that they are being paid. Now that financial institutions are connecting the dots, they are better able to identify and eradicate illicit activity in their businesses, and provide invaluable information to law enforcement to support the existence of networks and build strong money-laundering cases.

Money remittance services are following suit. They are closely monitoring frequent, low-currency IMB-related remittances from potential IMBs both domestically and to trafficking source countries like China and Korea.

Lastly, credit card companies are also positioned to make an impact. Unlike most forms of sex trafficking, which are cash-based, IMB traffickers regularly accept credit card payments. Credit card companies can use this knowledge to monitor corporate customer use, flagging both purchases and accepted payments that indicate exploitative practices.

In the following section, Polaris details how commercial, legislative, cultural and law enforcement systems, often despite their best intentions, support sex trafficking in illicit massage businesses. We then proffer achievable solutions based on our understanding of those systems and the necessary cultural shifts.

1. Overhauling Business Regulatory Frameworks

IMB trafficking is subject to the same types of criminal laws that any human trafficking case might involve. Because IMB trafficking involves aspects of legitimate business, civil code — the laws regulating specific business operations — also plays a strong role in ending this type of trafficking. In fact, it is when both law enforcement and code enforcement work together that we see some of the strongest cases built against human traffickers. A robust code enforcement effort developed in partnership with experienced, culturally-competent service providers can build trust with survivors, connect them to resources and supports, and educate them about their rights. These enforcement agents can also gather information during regular inspections that law enforcement can later subpoena to strengthen their investigations and take down entire criminal networks. In this section, we will discuss what civil code looks like, how it is enforced, and how it can be a powerful tool for ending IMB trafficking.

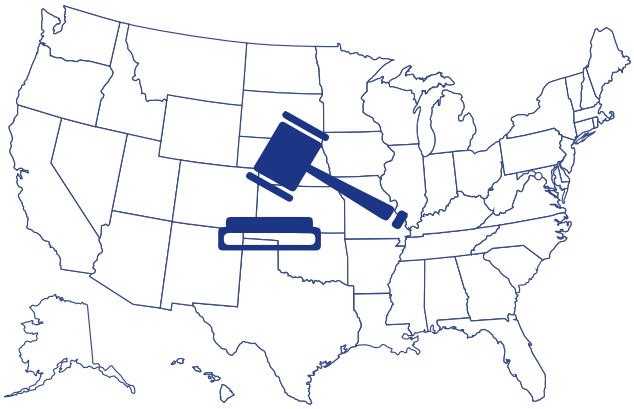
Business-related civil code is usually aimed at consumer safety and general public welfare. These laws can be written at the state, county and municipal level, and govern things like occupancy, standards of cleanliness, proper entry and exits, hours of operation, and locks on doors. For example, restaurants are required to adhere to specific protocols for cleanliness, and hotels must meet standards for fire evacuation routes. Individual employees are not held responsible for meeting these standards. They are the responsibility of the business owner. Similarly, health and beauty businesses like hair salons and nail salons can be subject to standards regulating cleanliness, operations, and ensuring employees have any required professional licenses. All of this is enforced by code enforcement inspectors from health departments and other relevant agencies, who perform regular inspections and can levy fines or shut down businesses in violation.

Strong civil laws regulating massage would operate in the same way as these other business regulatory frameworks. These laws would hold business owners responsible for complying with reasonable operating standards that protect massage therapists and their customers. At the same time, these laws would make it more difficult and less lucrative to sell sex under the guise of a massage business. Such laws might, for example, require the front door of the business to be unlocked and available for customer entry. This would have little or no negative effect on licensed massage therapists or their customers, but would serve as a deterrent to sex buyers — who prefer more discreet side or rear entrances — from frequenting a massage parlor in which women are trafficked, out of concern they would be seen by law enforcement or by others in their community.

PROBLEM:
State and local regulations are often nonexistent or inappropriate

In order to gain an understanding of what business regulations governing massage businesses look like nationwide, Polaris researchers examined laws related to massage[107] in over 35,000 jurisdictions, including all U.S. states, counties, cities, and inhabited U.S. territories.

What we found was a tremendous amount of variation from state to state, county to county, and city to city.



The national regulatory framework

The national system for regulating massage parlors starts with federal business and anti-trafficking laws. Because the federal laws are broad, the legislative work to make them more specific and enforceable falls on local jurisdictions including states, counties and cities.

A strong state law would, in theory, be an effective blanket solution setting a baseline from which the counties and cities located in that state could regulate business operations. In practice, state laws are only as good as the commitment and resources available to make sure they are enforced. Often, states have strong laws but state-level enforcement efforts are not consistent or sufficiently resourced, and typically emphasize larger scale enforcement efforts, not smaller businesses within individual city limits. The reality of business regulatory enforcement is that city and county level enforcement agencies tend to most actively enforce county and city based violations.

County legislators may create additional regulations on top of the state regulations, making them more specific and restrictive, but not more lax. If a state law regulating massage parlors does not exist, counties within that state are still legally entitled to create their own laws.

Cities may also create regulations even in the absence of county or state laws. Cities fall into one of two categories, those that are *incorporated*, meaning they are empowered to create and enforce their own laws; and those that are *unincorporated* meaning they are either required to, or choose to, follow county laws and rely on county-based government bodies for administration instead of making and enforcing their own laws.

Incorporated cities are in the uniquely strong position of being able to pass hyperlocal, culturally relevant laws that incorporate the needs of their constituents when it comes to massage-related businesses. They are also able to enforce those laws with a nuanced understanding of how human traffickers attempt to avoid compliance with business regulations in their locality. However, there are important limitations when it comes to the larger goal of ending trafficking. If an incorporated city with strong, locally relevant regulations is located in a county with lax regulations (and plenty of nearby unincorporated cities where those lax regulations are in effect), traffickers will simply move from the highly regulated incorporated city into a nearby unincorporated city. Therefore, for a legislative solution to be truly effective, it must be strong across state, county and city jurisdictions.

Regulating massage establishments as "sexually-oriented" businesses

In some incorporated cities, massage businesses are regulated within the "sexually-oriented" or "adult establishment" category, together with businesses like adult bookstores and strip clubs. Why? Massage therapy has historically been subject to harmful, deeply-embedded stereotypes that sexualize this health profession. As a result, massage therapists are regularly harassed,[108] propositioned,[109] and assaulted[110] by customers who assume that any massage has some possibility of sexual access to the massage therapist's body.

These stereotypes are not condoned by any professional massage associations. The American Massage Therapy Association's list of 25 reasons to get a massage ranges from "manage low back pain' to "lower blood pressure" and "reduce chemotherapy-related nausea," with no mention of anything sexually-oriented.[111] When cities and other jurisdictions recognize that their laws are perpetuating harmful stereotypes and move to change them, they are taking a big step toward shifting the national narrative around massage therapy.

By that standard, the current legislative landscape is far from ideal. There are significant gaps across every level of jurisdiction, from no regulations at all, to weak regulations containing loopholes for traffickers to exploit. Some jurisdictions focus regulatory attention solely on massage therapists and other employees (licensing standards, proper attire, etc.), rather than the business itself (structure, operations, management, ownership, etc.). Enforcement of employee-centered laws like this harmfully focus attention on potential victims, often resulting in victims being cited or fined for signs of illicit activity in the business, while their employers — the traffickers — are conveniently able to deflect all blame to the victims, with no consequences to their trafficking operation. Another major issue prevalent across the country is when jurisdictions harmfully list their business regulations for massage under the category of "sexually-oriented" or "adult" businesses, tacitly affirming the notion that the massage profession is intertwined with commercial sex, as opposed to grouping it appropriately with health and beauty establishments.

The ultimate regulatory goal is a set of state, county and city laws that focus attention on regulating businesses (not solely employees), closing loopholes that traffickers exploit, and categorizing massage venues appropriately as health or beauty businesses as opposed to sexually-oriented establishments.

The regulatory landscape of California

California, the country's most populous state, is home to over 35 percent of the country's IMBs and contains two of the three main port of entry cities in the country through which victims enter the United States and are initially trafficked (Los Angeles and San Francisco, the third city being New York).

While California has a statewide law that mentions the massage industry, the current law does not directly regulate massage businesses within the state, instead delegating regulatory power to local jurisdictions at the county and city level. California did not have any state law mentioning massage therapy until 2009, when it passed the "Massage Therapy Act" or SB 731. This law allowed regulatory power to stay at the county and city level, and created a voluntary credential for massage therapists (California Massage Therapy Council (CAMTC) certification) valid throughout the state. It also limited the ability of cities and counties to selectively discriminate against massage therapy businesses via their land use authority. In other words, it gave massage businesses the legal right to be located in the same buildings and neighborhoods as other health care and personal services.[112] Many massage therapists supported this bill as they believed that it would establish a uniform standard that would demonstrate their professionalism.[113]

However, in 2014 when the Massage Therapy Act was about to sunset, a number of city and county government officials testified that the law had led to an increased IMB problem, and that to deal with it, they needed their land use authority restored so that they could implement measures such as restrictive zoning, spacing requirements (e.g., "1000 feet away from a school") and other regulations that tacitly group massage businesses with other businesses that could potentially cause harm to a community.[114] These well-intentioned changes were meant to support legitimate massage businesses while giving local jurisdictions the power to eliminate IMBs.[115] Due to the size of the state of California, its role as a port of entry for victims, and the overall extent of its IMB problem, the creation of a stronger regulatory framework at the state level in California could have ripple effects throughout the United States.

The result of the 2014 change to the Massage Therapy Act was the enactment of many dramatically different laws at the county and city level. At the county regulatory level, California stands out as a strong performer. Many California counties have embraced their regulatory role by creating laws that address the massage industry in some form.

Unfortunately, some counties with high concentrations of IMBs do not have strong laws regulating massage business operations. Los Angeles County, which has one of the highest concentrations of IMBs in California (as well as nationally) lacks strong regulations. Additionally, over 65 percent of the municipalities in the county are unincorporated and therefore not empowered to create their own laws.[116] This has turned the county into a safe haven for traffickers pushed out of neighboring cities with stronger regulations.

To remedy this, in November 2017, local law enforcement and Los Angeles county supervisors passed a motion to move forward in developing countywide legislation to regulate massage businesses, a draft of which was ordered to be created by May 2018. If the legislation is done well, Los Angeles' leadership could be an example for the rest of the state, where many cities rely on county laws to regulate massage and other businesses.

While some cities in California possess strong laws and awareness around IMBs, there are still significant gaps. Increasing the number of California cities with strong, regularly enforced laws around IMBs even slightly, if done in the right areas, could have significant impact on the ability to put pressure on trafficking networks around the country.

It's important to note that many California cities are unincorporated, which means they are not empowered to pass their own laws and are bound by county laws. As discussed earlier, this presents a legislative vulnerability IMB traffickers readily exploit. If an incorporated city adopts stronger regulations, but the surrounding county has not caught up, traffickers can simply move out of that incorporated city and into an unincorporated city that follows the lax county laws.

Creating a strong law in Santa Clara County, CA

Santa Clara County, located in Northern California, has the third highest concentration of IMBs among counties in the United States. To address this issue, lawmakers recently worked with Polaris to establish a strong countywide law. The new law includes provisions that target IMBs, such as hours of operation, and a requirement that massage therapists display their California Massage Therapy Council (CAMTC) licenses.

Unfortunately, county laws are only enforceable in unincorporated areas of a county — they do not apply to cities that are empowered to create their own laws. Once Santa Clara County began to use its new law to permanently shutter IMBs in unincorporated areas, traffickers simply picked up and moved to nearby incorporated cities with more permissive laws or lax enforcement. Traffickers reap tremendous benefits from a lack of coordination between state, county and city legislation. The only way to cut them off at the pass is to undertake a coordinated effort to make sure they have nowhere else to go.

The national regulatory landscape

While the majority of states have laws that mention massage in some way (regarding licensing or other regulations for individual practitioners, or delegating regulatory power to another jurisdiction), few have strong laws that directly regulate business operations. We see a similar landscape at the county and city level.

Having established professional standards for massage therapists is important. However, as mentioned earlier, the most effective legislative tool for addressing trafficking operations is to focus on business owners and operators, not individual practitioners who, in businesses where the trafficking is occuring, may be potential victims. Regulating the business itself is disruptive to trafficking operations, which benefit from a lax regulatory climate that allows them to point the finger at their employees whenever illicit practices come to light.

In states, counties, and cities that do regulate massage business operations, the most pressing need is victim-centered enforcement of existing laws, supported by resources to provide proactive outreach to and support of survivors. In states, counties, and cities that lack strong laws regulating massage business operations, improvements to both legislation and enforcement are needed.

A lack of regulations has a particularly strong impact in the major port cities for IMB trafficking. New York City, one of the top three cities where IMB trafficking victims enter the United States, is not subject to strong laws regulating massage businesses at the city, county or state level, and many surrounding cities and counties also lack robust laws. We see this lack of focus on business operations reflected in press coverage of illicit massage parlor "busts" in the state of New York, which frequently report on women arrested for "unauthorized practice of a profession" in fraudulent massage establishments, but rarely mention the traffickers posing as legitimate business owners or operators.[117]

New York City differs from the two other major port cities, Los Angeles and San Francisco, which have city laws regulating massage businesses — not just employees. San Francisco has seen great success in using city laws to shut down IMBs and levy fines against traffickers. San Francisco's city laws are supported by a strong county law. Los Angeles also has a strong law at the city level, though it has been hampered by lack of regulations at the county level. As mentioned earlier, IMBs can easily escape regulation by moving outside the city limits, to unincorporated cities within Los Angeles County. In November 2017, Los Angeles County started the process of developing an updated county law.[118] If New York remains the only port city without strong laws or enforcement, it could see a shift in how recruiters and trafficking networks use the city.

SOLUTION:
Legislators should create strong, enforceable laws at the state, county and city level

As long as trafficking networks can continue to shift their operations to avoid uncomfortable civil laws, they will. The solution is to create an inescapable situation where states, counties and cities are all exerting equivalent pressure to make IMB trafficking impossible.

Creating strong laws

States must pass strong baseline laws, and counties and cities must echo and elaborate on those laws to address their individual needs. For example, Florida's state law mandates that no massage establishment may stay open past midnight. Counties and cities in Florida should echo this restriction and actively enforce it. Additionally, if Broward County, or Tampa City decide that the issue in their locality requires further restricting the closing time to 10 p.m., then they should pass additional legislation accordingly.

To determine exactly what legislation is appropriate for a jurisdiction, Polaris encourages legislators and policymakers to partner with us, as well as national organizations or state-level massage chapters. Jurisdictions that already have strong laws should encourage state and local code enforcement agencies to review them and determine if any key provisions should be enforced more consistently to apply pressure to traffickers. Any discussions around increasing enforcement should include a discussion on ensuring services are provided for the women during and after code enforcement actions.

A Strong Law

Characteristics of a strong law will vary by location. Here are a few elements that many strong laws have in common:

- **Regulating hours of operation.** San Francisco city has used, among other things, a provision on hours of operation to successfully close more than 100 IMBs in two years.[119]
- **Prohibiting structures like buzzer-controlled front doors and back-door entrances that obscure buyer behavior.** Santa Clara County's law, which includes provisions around entrances, was used to close down all IMBs in its unincorporated areas within one year.[120]
- **Regulating massage businesses with other commercial licensed businesses.** Within the past 10 years, Delaware has gone from regulating massage establishments as "sexually-oriented businesses" to having a robust, statewide law categorizing massage businesses as health businesses.[121]
- **Working with local massage therapists.** North Carolina passed a new statewide law on massage establishments in July 2017. This law was passed with collaboration by Polaris, North Carolina's American Massage Therapy Association chapter, and members of the Human Trafficking Task Force to ensure strong provisions against traffickers while protecting massage therapists.[122] This kind of collaboration, both in the original passage of the law and in the aftermath to monitor and make changes accordingly, is the baseline for ensuring laws are written to succeed and amended as necessary as traffickers adapt to changing conditions.

Statewide Law in Delaware

Before 2008, Delaware state law classified all massage establishments as "adult entertainment" businesses. In 2008, the state legislature decided to recognize massage therapy as a non-sexually-oriented profession and believed that these establishments could best be regulated at the local level by members of the State Board of Massage and Bodywork, so it abolished the law completely, leaving massage businesses unregulated by the state.

In 2016, a concerned constituent contacted State Representative Bryon Short (D-Brandywine Hundred) to make him aware of the existence of numerous IMBs in the district he represented.[123] Rep. Short had known for some time that human trafficking was a problem in the United States, but he thought it was a big-city issue. When he dug deeper into what was happening in his own community, he learned from law enforcement that there was an IMB a block from his own home, where the women were forced to live in the basement. Rep. Short then contacted Polaris and we worked with him to better understand the issue.

Meanwhile, the Office of the State Attorney General had seen an increase in the number of massage-related prostitution arrests and an increase in nuisance abatement suits, and had successfully brought a civil organized crime case against an IMB network owner. That office was supportive of taking action at the state level.

Polaris worked together with the Office of the Attorney General, Rep. Short, and the massage therapy community to craft legislation targeting traffickers while minimizing the burden placed on massage therapists. For example, instead of blanket banning buzzer-entrance front doors and locks on massage rooms, the new legislation made an exception for solo massage therapists, allowing them to secure their front doors while with clients. The carefully crafted provision helped keep therapists safe while targeting a common IMB behavior. This law will provide new, and needed, tools to disrupt trafficking in IMBs in Delaware.

Why massage therapists must be part of the legislative process

Massage therapists must be included early on in the legislative process to ensure their professional needs and personal safety are incorporated into the laws.

According to a recent report by the Federation for State Massage Therapy Boards (FSMTB), "the association of massage therapy with prostitution or 'happy endings' subjects therapists to assault, threats, harassment, and more subtle forms of intimidation."[124,125] This echoes sentiments expressed in Associated Bodywork & Massage Professionals (ABMP)'s January/February 2013 edition of *Massage & Bodywork*. One article in the magazine, "Hiding in Plain Sight," stated, "If you think you are not affected by sex trafficking, consider this: if for safety reasons you have chosen not to have a private practice, or to work only in settings where a second person is in the office at all times, you have made career-limiting decisions due to the inappropriate cultural stereotype of massage as a sexual service. Sex trafficking is hurting you."[126] When men perceive massage therapists as potentially open to sexual advances, the massage work environment becomes dangerous.

Men who are refused sexual services can, and do, retaliate with harassment and abuse. This retaliation can include posting an address on commercial sex websites directing other buyers to go and harass the massage therapist.[127] Or it can escalate to sexual[128] or physical[129] assault. In October and November 2017, a flood of women came forward against Hollywood producer Harvey Weinstein for sexual harassment and assault.[130] One of the women who came forward was a highly sought after massage therapist with a celebrity clientele who reported being assaulted during a massage appointment at Weinstein's hotel room (a common venue for celebrity appointments)."[131] While this is just one high-profile example, we regularly see reports of massage therapists being targeted with sexual harassment and assault.

> As long as traffickers continue to fraudulently operate under the guise of massage, it will continue to affect the massage profession.[132]

For this reason, we regularly see massage therapists engaging with legislators, as they did recently to help develop a strong new law in Santa Maria, Calif.,[133] and testifying at city council meetings, as they did in Chicago (where unfortunately, their input was not incorporated).[134] Legislators must widen their perspective of the problem to consistently recognize massage therapists as important stakeholders in the legislative process.

Putting the laws into practice: code enforcement

Once laws are passed, they become part of civil codes, detailed rules of the road for businesses that are enforced by health inspectors and other civil agencies.

Code enforcement has the power to be especially effective because it shifts the focus away from potential victims, toward the parties — traffickers and landlords — who profit from and maintain control over the operations. Often, these parties do not view code inspections as a real threat, the way they would regard police entering the business.

Traffickers are legally bound to allow code inspectors consistent and unhindered access into the businesses to check for things like whether the building's entrances and exits are in compliance with municipal, county or state code. If a business is in violation of code, it can be cited and fined. If violations occur with enough frequency, either the property can be closed down by the city, or the business or property owner will give in to the financial pressure from mounting fines and shut it down. And if cities and counties collaborate and share this information, they can prevent the operations from simply relocating.

In the past two years, cities and counties with strong laws have used the power of code enforcement to shut down IMBs, collect fines, and apply direct financial pressure to the traffickers. The cities of San Francisco, Houston, and Brooklyn have collectively shut down a little more than 100 IMBs in the past 12 months, solely through code enforcement.[135] In 2015 and 2016, the County of Santa Clara was able to use a combination of code enforcement actions and court-mandated fines from the ensuing court cases to permanently close IMBs in their area, some of which had been operating for decades. As of publication of this report, none of them have reopened nor have any new IMBs opened.

Code enforcement has significant leverage when it comes to exerting financial pressure on illicit businesses. The daily fines can range from $200 in San Francisco[136] to $1,000 in Santa Clara county.[137] Fines have a dual benefit of gathering money for future anti-trafficking efforts while also sending impactful warnings to landlords to take action against their IMB tenants to avoid financial penalty.

The financial pressure proves unsustainable for owners, closing down IMBs that had been operating for decades. The paper trail created by civil enforcement can also form part of a longer game in ending trafficking. With enough documented violations, particularly if they relate to potential indicators of trafficking, civil enforcement can actually help build cases for criminal enforcement to bring charges against the traffickers.[138]

Code enforcement can also put pressure on landlords who would otherwise prefer to look the other way. It can take the form of direct enforcement action against landlords, or simply alerting landlords that an enforcement action took place against one of their tenants. Success for this pressure point ultimately comes when landlords evict criminal tenants, as was the case in Indianapolis, sending a strong message to other traffickers in the area.[139] Likewise, lawsuits against the landlords send a strong message of accountability to other landlords.

Lastly, code enforcement has a unique benefit when it comes to victim-centered intervention. Code Enforcement and Public Health officials can enter the premises for routine inspections, and provide survivors with access to resources and social service assistance without imposing the threat of criminal or immigration enforcement that victims are often conditioned to fear.

The San Francisco Department of Public Health's (SF DPH) Environmental Health Branch has had success in establishing rapport with potential victims through regular inspection. This has led to positive outcomes like a recent case in which one woman admitted she was not happy, did not want to be in the IMB anymore, but felt she had nowhere else to go. Public Health officials were able to refer her to a community-based organization serving the Chinese immigrant population to provide her with support and resources. The survivor has since been able to gain access to legal services and job placement.

San Francisco's Civil Enforcement Success

San Francisco is one of the three main port cities where IMB trafficking victims begin their journey of exploitation and abuse. In 2015, the San Francisco Department of Public Health's (DPH) Environmental Health Branch, which is tasked with inspecting and regulating massage establishments, identified a little more than 400 IMBs within the city. The San Francisco Police Department had conducted major criminal investigations and operations in the previous 10 years, but the operations were not resourced to occur with enough frequency to truly impact the growing IMB problem in San Francisco.[140]

Luckily, the San Francisco city regulations for massage establishments contained some provisions that could allow the Department of Public Health to step in and support by citing and, when necessary, ultimately closing down IMBs. The DPH team quickly got up to speed with different aspects of the city business code and how the department could use it to increase consequences for traffickers while improving outreach to potential victims.

DPH began with long-time, repeat offenders, and coordinated with San Francisco Police to make sure it avoided IMBs that were under active police investigation. Since the DPH began its concerted effort to help target traffickers, more than 175 IMBs (about 40 percent citywide) have permanently closed down. Some IMBs even closed down without direct code or law enforcement action; they simply saw that the city was cracking down and chose to move to a city with fewer rules and more lax enforcement (a win for the city of San Francisco, but not for the wider effort of ending trafficking in the United States — this example illustrates why uniformly strong laws are needed in all jurisdictions).

In some cases, DPH has been able to work with the city attorney to utilize San Francisco's Red Light Abatement law. This law has successfully been used to target a business owner and landlord who have repeatedly re-opened an IMB over multiple years. The owner and landlord were compelled to vacate the space for a year, sell its fixtures and movable property at an auction, and give the proceeds to the city to fund enforcement, and levy penalties against the property owner and the business owner. Two additional businesses are now being brought to trial for similar issues.[141]

The department continues to decrease numbers of IMBs, working closely with law enforcement, the city attorney, the California Massage Therapy Council (CAMTC), and San Francisco Department of Public Health's Newcomers CONNECT Project, a program that works to build trust among women in IMBs, providing them with resources and support. The work by San Francisco DPH and its partners remains one of the most successful, large-scale and sustained efforts by a civil enforcement agency to disrupt IMB trafficking in its jurisdiction.

2. Unmasking Shell Companies to Reveal Business Owners

A shell company is a corporation that exists on paper only, with no actual assets.[142] Shell companies are a staple of criminal enterprises which want to disguise who really owns and therefore benefits from a company. With the help of a shell company, the owner of an IMB can list "Massage LLC" on business regulation paperwork as the owner instead of John Q. Smith, the owner's real name. This makes it incredibly difficult to track down who the actual criminal actors are. Currently, no state requires persons forming corporations to name "beneficial owners" (those, like John Q. Smith, who reap the benefits of ownership of a business, but do not actually own the business itself) at the time of formation.[143]

PROBLEM: Secrecy abets trafficking

In the case of IMB ownership, shell companies allow traffickers to skirt regulation. For example, if a city regulates massage businesses, the trafficker will register a similar, unregulated business type such as bodywork, reiki, or a modeling studio. In Houston, many illicit massage businesses were registered as modeling studios until the city re-wrote its local ordinance to close this loophole.[144] In particularly egregious cases of illegal behavior, traffickers register under unrelated industries such as religious organizations or educational institutions, making them eligible for tax breaks. In addition to relying on the anonymity of shell companies, traffickers often use registered agents (third party representatives who manage correspondence and official corporate business on behalf of true owners) to register the corporations, obscuring the actual network operatives.

Suspicious shell company flags of illicit behavior can include:

- **Inconsistent identification documents** (including false information, or fraudulent photographs, or otherwise inaccurate identification information)
- **Lack of information on the nature/ purpose of the business**
- **Suspicious employment history or background** as to what would be expected for the specific business activities
- **Deposits in several accounts in amounts less than standard amounts**
- **Funds transfer activity is unexplained, repetitive, or shows unusual patterns** (multiple wire transfers, mismatch of goods purchased and stated line of business; high levels of automated teller machine activity; frequent exchange of small-dollar denominations for large-dollar denominations; high value transactions not commensurate with known incomes).

The abundant use by traffickers of shell companies and registered agents makes it difficult for law enforcement to identify the true perpetrators. An article in the *Houston Chronicle* exposed a number of illicit massage parlors in Houston and how they serve as a front for sophisticated, multinational human trafficking rings. Assistant County Attorney Celena Vinson has filed 24 civil lawsuits to try to shut down and evict these massage businesses.

The article explains, "Vinson and criminal prosecutors say it's often difficult to determine true owners of rogue massage businesses she attempts to target through civil action. Many have registered business names that lead only to shell companies with post office boxes for addresses."[145] This frustration has been expressed by law enforcement and prosecutorial stakeholders across the nation as a barrier toward identifying and prosecuting the true perpetrators. The level of sophistication allows traffickers to hide behind anonymity, leaving the survivors in a vulnerable position as the visible face of the organization, often the sole parties to be blamed for any illicit activity.

The states in which the regulatory framework makes it easiest to set up anonymous shell companies are Delaware, Nevada and Wyoming because a business can be registered with "virtually no questions asked."[146] Delaware is the most well-known of the three. Delaware currently requires more personal information to register for a library card than to register an LLC, and as a result, there are more corporations than actual human residents in Delaware.[147]

Other states that foster a lack of transparency in incorporation are Virginia, Washington, Montana, South Dakota, and New York.[148] This aligns with what we have found in our research of IMBs across the U.S., with more than 500 shell companies registered in these five states, making up nearly 20 percent of the total for the entire country.

San Francisco Spa Obscures Ownership

Shell companies are intended to make it difficult to discover true business ownership. One spa in San Francisco provides a good example of how confusing a purposely obscured business organization can be. The phone number and address for the spa, listed on RubMaps, also belong to a business bearing an individual's name. That business is classified under the Standard Industrial Classification: Religious Organizations. And it is not the only linked business. The spa's phone number is also connected to another business in Los Angeles with a name advertising sexual products (classified under Miscellaneous Retail Stores), as well as a residential address in Los Angeles.

While there is no listed point of contact for the shell company, the address and phone number are that of the original advertised illicit massage business. The business name is also an alias of the name of the owner of the illicit massage business listed on RubMaps. Having a shell company registered at the same address as an illicit massage business facilitates the movement of illicitly gained funds, and allows the spa to keep its reported annual income under $100,000 to meet the definition of a small business for tax purposes. Additionally, any income the shell company earns that exceeds the reported annual income can be passed off as donations, and because it is registered as a "Religious Organization," it can qualify for different tax breaks that other small businesses do not receive.

Polaris examined IMB networks across the country to determine the extent to which shell companies were used to keep information about the business' real owners out of the hands of law enforcement or the public.[149] Within Polaris's dataset of IMBs and IMB-affiliated shell companies, we found that states varied in the proportion of shell companies to IMBs. For example, Delaware has about one IMB-affiliated shell company for every three of its IMBs, while neighboring New Jersey averages one IMB-affiliated shell company for every two of its IMBs, and other states such as Virginia have almost equal numbers of IMB-affiliated shell companies and IMBs. In fact, Virginia is home to more IMB-affiliated shell companies than actual IMBs. In New York, there is nearly one shell company for every six IMBs, or about 11 percent of all researched businesses in the state are shell companies, which speaks to New York's lack of business record transparency requirements.

SOLUTION: Require transparency in business registration

Both state and federal laws should require businesses to register official operators and primary owners (beneficial owner, partner, etc.), all of which should be required to provide a valid phone number and address. Additionally, the official operator listed on all registration records should be made legally liable for the business, unless it can be confirmed that the listed operator is a victim who was compelled to list herself as an operator.

At the federal level, Congress should pass comprehensive legislation like the Corporate Transparency Act, introduced in both the House and the Senate in 2017. Effective legislation would reduce anonymity in the private sector by requiring entities formed or registered in the United States to formally declare their beneficial owners. Additionally, it should bypass state corporate law governing the incorporation process for new business entities and authorize the U.S. Department of the Treasury Financial Crimes Enforcement Network (FinCEN) to collect beneficial ownership information at the corporation's inception and through periodic disclosures, unless a state chooses to collect this information on its own.

Specifically, effective legislation should include:

- Disclosure standards that require that beneficial owners:
  - (i) be identified by name;
  - (ii) disclose a current residential or business street address; and
  - (iii) provide a unique identifying number from a non-expired U.S. passport or a non-expired U.S. driver's license.
- Requirements that covered entities must also file annual reports of beneficial owners and provide updates to the government within 60 days of any change in the name or other information previously disclosed about a beneficial owner or in the list of people who are beneficial owners
- Imposition of criminal and civil liability for failure to report beneficial ownership information
- Requirements that companies disclose their true ownership information when incorporating and keep ownership information up to date, though it requires states to collect this information and ties the disbursement of law enforcement assistance grants to a state's compliance with the statutory requirements

With comprehensive federal legislation setting the standards for incorporation by which federal laws and tax liability are applied, state and local jurisdictions will be able to more effectively regulate the businesses within their communities. Once it is easier to identify who has a stake in the company, enforcement agents should train their staff on how to spot and report signs of trafficking — particularly when it comes to shell companies and IMBs.

3. Supporting Effective, Survivor-Centered Law Enforcement

While human trafficking has existed for centuries, it still represents a relatively new area of criminal law, and law enforcement is very much still trying to perfect its investigative methods.[150] The challenges are immense: competing priorities and chronic underfunding; lack of institutional knowledge; insufficient social services for survivors; and ingrained systems and beliefs that are hard to shake. Even the best intentioned jurisdictions often do not have access to culturally-competent service providers to support their operations. The stakes are equally high.

When done right, law enforcement actions can disrupt entire (often international) criminal networks and create pathways to freedom and healing. When done wrong, law enforcement actions can play into the hands of traffickers, arresting women inside IMBs for prostitution, and in the process, strengthening the traffickers' hands by feeding into the narratives used by traffickers to coerce and control.

PROBLEM: Random, punitive enforcement

Currently, law enforcement initiates investigations of illicit massage businesses mostly as a result of community complaints about "prostitution." In response to the complaints of criminal behavior, police then usually conduct undercover sting operations targeting the criminal act of prostitution.

Unfortunately, traffickers and managers have adapted to this strategy and rely on social media and CCTV to monitor and control the women from off-site locations. So when police arrive, only survivors are present. They are arrested for prostitution. If Homeland Security Investigation (HSI) is part of the sting operation, the victims may also be placed in an immigration hold. Nothing about this approach is designed to help potential trafficking victims. Instead, potential victims are treated like criminals and faced with what they are groomed by their traffickers to fear: police who arrest, and immigration authorities who deport.

To compound the downsides of this approach, these one-off stings usually only target a single location, when there are typically multiple IMBs in each network. Traffickers are highly mobile and prepared for this approach. After a sting, the traffickers typically lay low for a while at the affected location, moving the women and customers to a separate location within their network, ranging from just down the street, to the next town over.

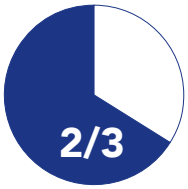
SOLUTION:
Adopt an organized-crime approach, shift to increasing pressure on buyers by doing demand stings

Rather than this "whack-a-mole" approach of undercover stings, jurisdictions must move toward a victim-centered, exploiter-focused approach that targets traffickers and buyers while protecting victims. This means relying less on victim testimony to prove trafficking and more on proactive, evidence-based organized crime investigations, shorter-term demand stings and code enforcement operations. Not only will this shift allow law enforcement to take down entire trafficking networks, but it will inherently limit the prosecutorial reliance on survivors' trauma as the backbone of their cases. Instead, jurisdictions will be able to start building evidence-based circumstantial cases that lean on buyers as live witnesses. This approach brings additional angles for possible prosecution, like labor trafficking, money laundering, tax evasion, and other financial crimes that allow access to steeper fines and penalties.

It is resource-intensive to build the institutional knowledge and obtain the funding necessary to shift to an organized crime approach. Additionally, these operations are time-consuming and not as quick to implement once community complaints start coming in to police departments and city council offices. Acknowledging those realities, an effective intermediate step would be to cease undercover prostitution stings and move to demand operations targeting buyers for arrest and prosecution. Demand operations can cut into an IMB's regular profit stream and generate fines that can be put toward anti trafficking and victim funds.

Demand stings also serve as a strong deterrent for future buyers. A 2011 study surveying both sex-buyers and non-sex-buyers in Boston found that spending time in jail would deter nearly 80 percent of potential buyers. Other public exposure techniques such as having their name and picture published online or in the newspaper would be similarly effective deterrents.[151]

According to national survey data from Demand Abolition, nearly two-thirds of men who have bought sex in their lifetimes—but are not active currently—agree they might buy sex again in the future if the "circumstances were right." Among men who have never paid for sex before, 1 in 5 agree they might buy sex in the future given the right circumstances. The top three circumstances that men stated as important are: (1) ensuring they would be safe physically, (2) ensuring they would not contract a sexually transmitted infection (STI), and (3) ensuring they would not be arrested.[152]



2/3 of men **who have bought sex** in their lifetimes agree they might buy sex again in the future if the "circumstances were right."

1 in 5 men **who have never bought sex** in their lifetimes agree they might buy sex again in the future if the "circumstances were right."

Unfortunately, the "right circumstances" that buyers are looking for are easy to find. Demand Abolition found that regardless of where, when, or how a man buys sex in the U.S., his risk of being arrested is very low, with only 6.4 percent of buyers overall ever being arrested for buying sex. Even among the most active sex buyers, 9 out of 10 have avoided arrest every time.[153]

Demand stings are how the criminal justice system can change this low perception of risk, by letting buyers know that there is a significant chance that they will be caught, arrested, and held accountable for breaking the law. The goal of demand stings is not to arrest every buyer, which would be impossible, or even to focus on the impact to each individual buyer arrested (though accountability and enforcement of laws is important). Instead, the goal is to increase the perception of risk for the behavior among sex-buyers and non-sex buyers alike, shifting societal norms around sex buying. To this end, Demand Abolition encourages agencies to (1) go after a larger number of buyers in a single operation so that people perceive a greater likelihood of getting caught, and (2) spread the word about those operations widely so that as many people within the community know that local police are taking the problem of sex-buying seriously. When both of those elements are in place, the increased perception of risk is maximized.[154]

PROBLEM:
Law enforcement lacks a connection to culturally-competent survivor support

Law enforcement looking to shut down a trafficking operation, rather than arrest the survivors for prostitution, need strong partners to work with in the service provider community. Without culturally-competent service providers to support the survivors' service needs, police officers will not be able to ensure that victims have a safe place to go after the operations, to get the support they need to ensure they are not re-trafficked. Unfortunately, these service providers are few and far between in many communities, and maintaining ongoing relationships with them if they do exist is rarely a funded priority.

SOLUTION:
Invest in culturally competent victim advocacy teams

Few police departments have the resources necessary to provide a level of victim advocacy and support that comes close to the scope of the need. Budgets must be expanded to acknowledge that victim services and advocacy is not a luxury, an add-on or an addendum to law enforcement but rather a key piece of the enforcement puzzle. Without support for the victims, they maintain all of the original vulnerabilities that traffickers exploit in the first place, as well as new vulnerabilities like being displaced from their homes.

In major centers of illicit massage business operations, there should be a dedicated liaison between law enforcement and the community of service providers that work with this population. In smaller jurisdictions where it may simply not be possible to support service provision in the necessary languages or with the level of expertise and knowledge needed, law enforcement must have the resources to consult with, learn from, and have access to service providers in other jurisdictions who can and do serve these populations.

PROBLEM:
Lack of resources

Despite the fact that trafficking remains a multi-billion-dollar industry, at present, the resources required for law enforcement to shift its approach to doing in-depth, organized crime investigations that involve collaboration across jurisdictional boundaries are typically beyond what is available in local police departments. One organized crime investigation in a Midwest partner state took nearly 9 months of investigation, more than $250,000 in department resources and overtime pay, nearly full time dedicated attention of an entire unit of detectives over the course of several months, and around 100 officers detailed on the day of the operation, as 6 distinct IMBs and multiple other crime scenes were involved.[155] The commitment of this level of financial and human resources is a prioritization that requires the allocation of those resources away from managing other areas of crime. It also, often, does not come with the appropriate, long-term commitment in official state and city budgets to make this style of anti-trafficking policing sustainable beyond the one long-term operation.

SOLUTION: Pursue dedicated anti-trafficking funding and leverage code enforcement as an intermediate step

Anti-trafficking funding sources for law enforcement

Law enforcement can find funding specifically for anti-trafficking work in their local jurisdictions in the form of federal grants through the U.S. Department of Justice Bureau of Justice Assistance, and the Edward Byrne Memorial Justice Assistance Grants Program (Byrne JAG). In the longer term, additional line item funding should be allocated to federal and state criminal justice budgets specifically to improve human trafficking investigations and prosecutions.

In the absence of these specific and sufficient pools of money, cities are attempting to create their own funds through creative appropriation of fines and fees charged to buyers and exploiters. For example, in Houston, the city won a suit against the adult entertainment industry which funded an entire anti-trafficking fund.[156] In Chicago, bill PA 98-1013 (formerly SB 3558) allocates fines collected against pimps, traffickers, and people who buy sex, and allocates assets confiscated as a result of forfeiture and impoundment proceedings toward specialized services for survivors of human trafficking and prostitution, empowering more victim-centered and exploiter-focused law enforcement actions.[157] Seattle similarly allocates portions of fines generated from buyer arrests toward future anti-trafficking and survivor support work.[158]

Code enforcement as a resource for law enforcement

As mentioned in the prior section discussing business regulations, code enforcement operations can provide a wealth of resources for criminal investigations. The citation paper trail is another thread of circumstantial evidence that can be used to supplement evidence-based prosecutions, including the provision of additional official witnesses who can testify to the conditions of the IMB and its business operations. Code enforcement operations simultaneously serve to put additional pressure on criminal operations. As Rockland County, New York District Attorney Thomas Zugibe said recently of traffickers, "Sometimes the criminal laws are not enough to address the problem. The civil remedies hit them right in the pocketbook. They have to go hand in hand."[159]

PROBLEM: Fragmentation across jurisdictions and lack of institutional knowledge hampers investigation, enforcement and prosecution

While traffickers are very comfortable operating across city and state lines, law enforcement often has at best ad hoc processes for collaboration across jurisdictions. These systems, to the extent they exist, generally rely on personal relationships and rarely extend over state lines.

In multi-state cases, the best chances for effective collaboration involve bringing the United States Attorney's office and the Federal Bureau of Investigation to take the case. However, the charges and circumstances do not always rise to the level justifying state and federal prosecution. And the investigations are not often resourced sufficiently to even fully develop those connections across jurisdictional boundaries to then illustrate the need for a state or federal prosecution.

Even if jurisdictions are able to overcome the collaboration obstacles, they are often constrained by law. Trafficking, broadly, has only been officially deemed a crime in all 50 states since 2013 and many state and county-based prosecutors' offices have yet to prosecute their first human trafficking cases.

Even in jurisdictions where their statutes explicitly indicate that force, fraud or coercion are all acceptable forms of control to meet the statutory

definition for human trafficking, most prosecutors' offices are unclear on how to prove the fraud and coercion elements without relying solely on the word of the victims. Those jurisdictions that have prosecuted trafficking have usually only prosecuted when a strong element of force is present, and the case law especially around fraud and coercion is underdeveloped in regards to providing solid guidelines for the application of those laws.

Typically, local jurisdictions that have prosecuted human trafficking cases have only seen a handful or fewer of the 25 types of trafficking that exist in the United States, and they do not have the strong knowledge-sharing connections with prosecutors in other jurisdictions that would provide them with a greater awareness of the diversity in how trafficking operates. In many types of trafficking, including IMB trafficking, force is psychological rather than physical, harder to prove, and requires an overreliance on the victim's testimony at trial, which is traumatic and puts the victim in the position to have a case boil down to her word against the trafficker's.[160]

SOLUTION: Build networks of anti-trafficking law enforcement, code enforcement, and prosecutorial professionals

Jurisdictions must begin building ad-hoc connections and resources to share knowledge and best practices across the country. This may take the form of prioritizing attending regional and national trainings, to actively building coalitions and tools to share knowledge. This should also include harnessing advances in security and technology to facilitate streamlined collaboration and information sharing between official agencies in jurisdictions across the nation. Ultimately, once these connections and means of sharing resources are created and tested, the goal would be to standardize and formalize them.

The Offices of the Attorney General in Washington and Utah are noteworthy examples of jurisdictions that have shifted their systems to consistently use a collaborative approach to address trafficking in IMBs. Their work at the state level to empower local county and city-based jurisdictions within their states to seek support and collaborate across jurisdictions is shifting systems to make them more effective at sustainably eradicating IMB trafficking. Over the past two years, their work has led to shutting down nearly 50 IMBs, connecting survivors with culturally-appropriate services, and bringing successful charges against traffickers.[161,162] This success has been fueled by their efforts to coordinate statewide responses to counter trafficking networks that span across cities and counties, and to build a strong coalition of multiple levels of law enforcement, code enforcement, and victim advocates and service providers. As more states follow their example, we look forward to seeing similar positive results.

4. Closing Loopholes In The Commercial Real Estate Industry

Most illicit massage businesses rent, as opposed to buy, the properties they occupy. This is a strategy that allows them to easily relocate to a new city, or even state, if they come under pressure from law enforcement. This preference for renting puts landlords in the position of being either a key enabler, turning a blind eye to trafficking, or serving as a key ally toward ending it.

PROBLEM: Landlords have no real incentive not to rent to traffickers

In an overwhelming majority of states, landlords are shielded from liability for criminal acts perpetrated by their tenants. Even the states that do allow for third-party liability to extend to the landlords require a plaintiff to prove that the landlord had knowledge of the conduct.[163] Often, once criminal activity comes to light, the press reports that the landlord "denied any knowledge of criminal activity," which is what happened after recent raids in Boardman, Ohio,[164] and Springfield, Missouri.[165] In Springfield, the landlord took it a step further by telling the press that he had not been inside the building since before Asian Massage opened. He dismissed neighboring business owners' reports of suspicious activity, such as men parking across the street and walking to the massage parlor when there is plenty of parking, saying, "They're innocent until proven guilty and I'm not going to be the one that discriminates against them. To get biblical on it, judge not lest you be judged."

Sometimes, landlords claim that they are aware of criminal activity but are unable to evict their tenants. This was the story told by Rick Barcena, the chair of Tampa's Code Enforcement Board and a member of the Public Nuisance Abatement Board, when it was brought to the public's attention that he is the landlord of an IMB that has already been the subject of an undercover sting operation. He claims he started the eviction process after he received a police warning, but dropped the effort for unknown reasons. Clearly he was not under much pressure, as the letter warned him that "this activity may subject your business to be brought before the Public Nuisance Abatement Board," the very board he serves on.[166]

SOLUTION:
Landlords can take responsibility to ensure human trafficking is not happening on their rental properties, and cities can leverage nuisance abatement laws to address those who do not.

Regardless of legal standards, ethically, landlords should take measures to ensure they are not renting to human traffickers, and are alerting law enforcement immediately if it appears illegal activity is taking place on the property.[167] **Here's a brief list of questions landlords can use to guide this process:**

1/ Is the occupant the same person that signed the lease? Traffickers often use victim names on leases, to transfer blame and obscure roles within the organization.

2/ How is the rent paid? If it is paid in all cash each month, that could be a red flag.

3/ Is the business in compliance with your local laws regulating massage businesses?

4/ Does your lease explicitly prohibit illegal activities, including commercial sex, on the premises, and state that this qualifies as grounds for terminating the lease if discovered?

5/ Does your lease allow for people to be living on-site? If not, when you visit the massage parlor, does it look like people are living there? Do you see mattresses and/or a kitchen equipped to prepare meals (as opposed to a break room)?

6/ Do the customers appear to be almost entirely men, and are they coming and going frequently?

7/ Are neighboring business owners or residents reporting anything unusual, such as lots of people coming and going, or the business being open past normal business hours?

8/ Is there any evidence of the premises being used for commercial sex?

9/ Google the business name and address. Is it advertising on known commercial sex websites like Backpage or the massage section of Craigslist? Does it have sexually-oriented reviews on RubMaps?

10/ Have your tenants made any modifications to the rental property that cause concern or alarm?

To address landlords who are allowing human trafficking to happen unabated on their rental properties, cities are starting to take aggressive nuisance abatement action. The city of San Francisco recently successfully sued the landlord and business owner of Queen's Health Center, alleging it had been operating as a brothel since at least 2010. The settlement included an injunction preventing the space from being used as a massage parlor or similar business for at least 10 years and prohibiting the owner from opening a massage parlor or another personal service business elsewhere in San Francisco. In addition, the city levied monetary penalties against the owner in the amount of $195,000, and against the landlord in the amount of $100,000. The city is now suing a second IMB, Paradise Health Center, with the same general aim.[168]

5. Ending Online Practices That Legitimize Illicit Massage Businesses

While community-specific classifieds websites and social media platforms like Wechat and KakaoTalk are the primary media means for recruiting victims, sites aimed at a wider audience are vital for both drumming up customers and hiding the true nature of the businesses.[169] These include mainstream classified sites like Craigslist and Backpage and sites like Groupon and Yelp that are not traditionally connected to the commercial sex industry.

PROBLEM:
IMBs use classified sites like Craigslist and Backpage to advertise to buyers

Both Craigslist and Backpage illustrate how traffickers quickly adapt to pressure and find ways to continue to market to buyers. In 2010, Craigslist decided to shut down its "adult services ads" section in response to pressure from law enforcement and Congress, who were concerned with child sex trafficking.[170] At the time, Backpage still had an "adult services ads" section and absorbed all of Craigslist's previous advertisers. By 2011, 90 percent of Backpage revenue was coming from its "escort services" section alone,[171] a position it enjoyed until 2017, when it too responded to pressure and shut down its "adult services ads" section.[172] However, Backpage remains the preferred site for human traffickers to advertise commercial sex.[173] The ads that had flourished in the "adult services ads" section primarily moved to the "dating, women seeking men" section, with the exception of the IMB-related ads, which moved from "adult services" to the "massage" section on Backpage, and to a lesser extent, to the "therapeutic services" section on Craigslist. In other words, IMBs quickly adapted to align their online presence with the commercial front they use for all other purposes.

SOLUTION:
Craigslist and Backpage should screen for IMBs

Rather than accepting a potential commercial front trafficking operation at face value, classified ads websites can adopt simple policies to vet advertisers in the massage section. They can do this by performing a good-faith effort to determine whether or not a massage business advertiser is connected to commercial sex websites.

PROBLEM:
IMBs use daily deals websites like Groupon and LivingSocial to create a veneer of legitimacy

Groupon and LivingSocial advertise daily deals to an audience looking to try new services at a discount. For traffickers, these websites serve as a place not to advertise (IMB owners have little interest in attracting buyers who are interested solely in massage), but instead to use a mainstream website to appear legitimate in online search results. On these sites, the IMBs are often described as tranquil, therapeutic spas, despite having explicit advertisements on other sites like backpage.com and Rubmaps.com buyer reviews.

For example: The editors at Groupon recommended the following business: ↓

To get a sense of the extent of how IMBs are using sites like LivingSocial and Groupon, we analyzed every Groupon and LivingSocial connected to IMBs across Florida and Hawaii.[177] Most of the IMB presence on Groupon and Yelp consisted of "merchant accounts," or pages listing the name, contact information, and a brief description of an IMB without any active advertisements or coupons. These brief descriptions were vague, non-explicit, and very similar across sites.[178] In Hawaii, 25 percent of IMBs held merchant accounts on Groupon, and in Florida, 28 percent of IMBs held similar accounts. The IMB presence on LivingSocial very closely mirrored that on Groupon, most likely as a result of Groupon's buyout of LivingSocial in 2016 (25 percent Hawaii, 26 percent Florida).

Our analysis of Yelp in Hawaii and Florida found that in around 10-15 percent of cases, IMBs had claimed their accounts and were actively displaying explicit material in their business descriptions, describing "role play," "fully nude," and "fully equipped dungeon)"[179]

> From Our Editors
>
> Rockville Massage is a high-end day spa that provides guests with pampering services and accommodations. This establishment provides guests with multiple massage enhancements, such as hot stone, deep tissue, and Swedish massage. For effective and worthy beauty alternatives, head on over to this spa and leave feeling satisfied. Everyone deserves get pampered every once in a while so book your spa service at Rockville Massage and reap the benefits.[174]

But the same business also appears on Rubads.com, the advertising section of the IMB buyer review board website, RubMaps.[175]

While the content of the ad is not sexually explicit, the logo of the website, with tagline "find your happy ending" should raise an automatic red flag.

← Image source: Rubads.com[176]

or photos (ranging from suggestive selfies of women[180] to graphic photos of women's bodies).[181] We also noted explicit reviews from buyers, ranging from those hinting at sexual services offered[182] to actually describing the sexual services received.

SOLUTION: Online review and "deal" sites should screen for IMBs

Sites like Groupon and Yelp should consider policies banning businesses who advertise on commercial sex websites from setting up profiles.

In a review of Florida massage business accounts on Yelp, 96 percent of IMBs on Yelp were also advertising on overtly sexual websites, and those ads would pop up in Google search results often directly next to Groupon, Living Social, and Yelp search results.[183]

They should also provide greater oversight of reviews and business profiles with descriptions, photos or reviews alluding to "happy endings" or any other exploitative service and create a mechanism for tagging and reporting them to the National Human Trafficking Hotline (NHTH). Additionally, users should be empowered to report potential human trafficking in venues they have found advertised on these sites to the National Human Trafficking Hotline.

6. Shifting the Media Narrative to Increase Public Understanding, Decrease Public Tolerance

Media outlets have tremendous power to shape how the general public understands human trafficking in IMBs, and to generate public support for sustainable victim-centered solutions like stronger ordinances to target traffickers, and demand stings to target buyers. Unfortunately, uninformed reporting also has the power to reinforce harmful ideas — that what goes on in illicit massage businesses amount to victimless crimes and that "happy endings" are amusing and harmless.

PROBLEM:
Media coverage related to illicit massage businesses perpetuates incorrect, unfair and dangerous assumptions

To determine the extent of the problem, Polaris undertook a content analysis of 21 months worth of IMB-related news coverage, and found the following:

- **Media coverage often blames and shames the victims.** Ideally, 100 percent of media coverage would focus on exploiters, while shielding potential victims. However, we found that 39 percent of news coverage focuses on the potential victim as the perpetrator in the story, identifying her by name (39 percent) and sharing her photo (23 percent). We frequently also see other details, like her age and home address information. Not only does this reinforce incorrect public perception about who should be held accountable, it directly harms victims. Negative media exposure is a source of shame that can reinforce a victim's distrust in law enforcement, seeing officers as out to arrest and shame her, not as a source of potential help who will protect her from her exploiters.

- **Media coverage often refers to "prostitution," reinforcing the idea that commercial sex in IMBs is a victimless crime**. A full 67 percent of articles make reference to "prostitution," while only 48 percent mention "human trafficking." Only 10 percent of press coverage refers to the women as "victims." Sometimes in articles where human trafficking is mentioned, prostitution is also mentioned, in the context that the potential victim did not self-identify as a trafficking victim, and was therefore charged with trafficking.

- **Media coverage shields traffickers.** Traffickers are exposed less frequently than potential victims in the news. Only 38 percent of news coverage shares the trafficker's, manager's, or other operative's name, and 10 percent shares their photos (compared to 39 percent and 23 percent for victims). The fact that potential victims bear an even heavier media exposure burden helps traffickers feel relatively safe and shielded from the public eye. They often try to transfer blame to victims, from claiming ignorance to their activities, to requiring employees to sign a contract promising that they will not sell sex.

- **Media coverage ignores buyers.** Sex buyers are not just shielded by media coverage; they are rendered nearly invisible. Only 22 percent of news coverage refers to buyers or demand in any way, and only 2 percent of coverage shares the names of sex buyers, with only 1 percent sharing their photos. Instead, if they are mentioned at all, they are often treated like extras on a movie set: "two customers were present in the establishment at the time police entered." All of this feeds into a comforting reinforcement that buyers' reputations will be protected, and that they can continue to buy sex in IMBs as a normal, low-risk activity.

- **Offensive, joking language remains a problem.** While only 5 percent of the coverage we reviewed uses overtly offensive puns or jokes about "happy endings," it is significant to note the impact of such language in the context of reporting that tends to reinforce a prostitution framework and the idea of a "victimless crime." Offensive language in news articles mirrors the type of language that we see buyers using among themselves on buyer review boards such as Rubmaps. When this language is reflected in the public sphere, it fuels an increased sense of normalcy for buyers. They may become emboldened to proposition and even assault massage therapists in therapeutic establishments, who often report uncomfortable and dangerous behavior from male clients.[184]

- **Media coverage misses opportunities to educate the public.** More than a quarter of the articles we reviewed (26 percent) list common flags for human trafficking in IMBs without connecting the dots and mentioning "human trafficking." These common flags include things like: evidence of women living in the massage parlor (beds, clothing, large quantities of food), women appearing to work 7 days a week, and women who state that they do not know who their employer is. If the media can learn to make these connections for readers, this will be an important step toward shifting the public's perception of accountability.

- **Media frames the problem as a blight on the community.** The majority of the articles (59 percent) position the harm being done by IMBs as primarily suffered by the community, with harm done to trafficking victims in a distant second place (22 percent). Positioning the community as the primary victim is a problem because not only does it distract from the real victims — the women who are trafficked — but it lumps IMBs and the people involved in them together into a group considered dirty and immoral, further harming those victims.

SOLUTION:
Media outlets must create policies to protect potential victims, and law enforcement must carefully frame press releases

Media outlets must hold themselves to a higher standard of accountability, and do more critical reporting. At the same time, law enforcement must work to write victim-centered, exploiter-focused press releases that will help ensure good reporting.

As media outlets have done for sexual assault cases, they must establish internal guidelines and policies for how they report on IMB cases, whether trafficking is indicated explicitly in the police press release or not. Our recommendations include the following:

- **Create policies against sharing potential victim identifying information** in IMB cases, regardless of whether police reports state that human trafficking was involved
- **Focus on exploiters:** share information on potential trafficking operatives, share the name and photo of the business involved, pull the business license for details, look into who the landlord or property owner is
- **Draw attention to sex buyers:** interview neighboring business owners or residents about the kind of buyer activity they see around the IMB
- **Use the term "potential human trafficking"** or "commercial sex" instead of "prostitution"

What Good Reporting Looks Like

In September 2016, an operation took place in Tacoma, Wash. that led to the arrest of three potential trafficking operatives and the closure of the network of seven IMBs they ran. Coverage for this case, in a piece produced by Tacoma CBS affiliate KIRO, "Tacoma prostitution ring bust may be tied to national sex trafficking." was solidly exploiter-focused and victim-centered.[185]

- The article focuses on the exploiters arrested, sharing their photos, names and ages, and explaining the charges brought against them
- Quotes from law enforcement focus on the criminal network, potential exploitation of the victims, and larger trafficking indicators
- Victim information is carefully protected, with no photos or identifying info shared
- The article educates the public about trafficking by highlighting that the women were charged $10/day to live in an apartment above the IMB (an indicator of debt bondage and controlled movement)
- The article acknowledges that demand is part of the problem

The successful framing of this coverage is due in large part to law enforcement having conducted an exploiter-focused, victim-centered operation, and then having carefully communicated the information to the media. It is also a reflection of the reporter's dedication to avoiding sensationalism and offensive language.

Reporters rely heavily on police press releases to gather details for their stories. Taking an upstream approach, and encouraging law enforcement to write victim-centered, exploiter-focused press releases could be the single most impactful action to influence media coverage. Essentially, this means taking the same approach that they might take in a sexual assault case: protecting the victim's identity, refraining from using language that potentially confers blame on the victim, and instead focusing on the offenders.

Law enforcement can improve press releases in IMB cases by:

- **Instead of using "prostitution,"** use "potential human trafficking" or "commercial sex"
- **Do not release potential victim photos, names, or other identifying information**
- **Share information about the business** (name, address, registered owner) **and information about potential trafficking operatives** (owners, managers)
- **Indicate the role demand played in the operation** — were neighbors reporting a steady stream of male-only customers? Were there buyers in the business during the operation?

In addition, law enforcement can be careful about what language they use when being interviewed by the press. They can reframe the conversation around "potential human trafficking" and keep the focus on traffickers and buyers. They can avoid sound-bites about "cleaning up the neighborhood" or about how close the IMB is to a school or church, invoking shame that may be transferred to the victims.

7. Working Together to Ensure Victims Receive Robust, Culturally-Competent Services

Survivors of human trafficking require specialized, culturally-competent support once they have left a trafficking situation. Providing this support is vital to systemic disruption of human trafficking. Without support, survivors of illicit massage parlor trafficking — and all other forms of human trafficking — are in grave danger of being re-trafficked.

Three things that have emerged as necessary for the field are:

1) the importance of growing the number of culturally-competent service providers in the country,

2) connecting them to each other and to other professionals such as interpreters and attorneys to develop a seamless "safety net," and

3) working to improve the long-term economic stability of IMB trafficking survivors.

PROBLEM: Lack of culturally-competent service providers

The needs of American-born trafficking survivors differ from those of Chinese- and Korean-born survivors who are the primary victim population in illicit massage businesses.

While American-born survivors are usually concerned most urgently with stable housing or immediately reconnecting with family, Chinese- and Korean-born IMB survivors are usually primarily concerned with locating their immigration paperwork and becoming documented, and making a living wage to send money home.

In addition to those priorities, service providers often also provide English language education, legal services, access to short-term and/or long-term shelter, labor and immigrant rights training, financial education, job skills training, and job placement.

In cities with significant Chinese and Korean communities, such as San Francisco and New York, specialized services have risen to meet the needs. But illicit massage parlors exist in every state, and similar providers do not.

Even in the best-case scenarios, service providers across the country report being underfunded and under-resourced. While Polaris, in partnership with multiple service referral partners, attempts to fill these gaps through the National Human Trafficking Hotline, systems need to continue to adapt across the United States for more sustainable methods of meeting survivor needs.

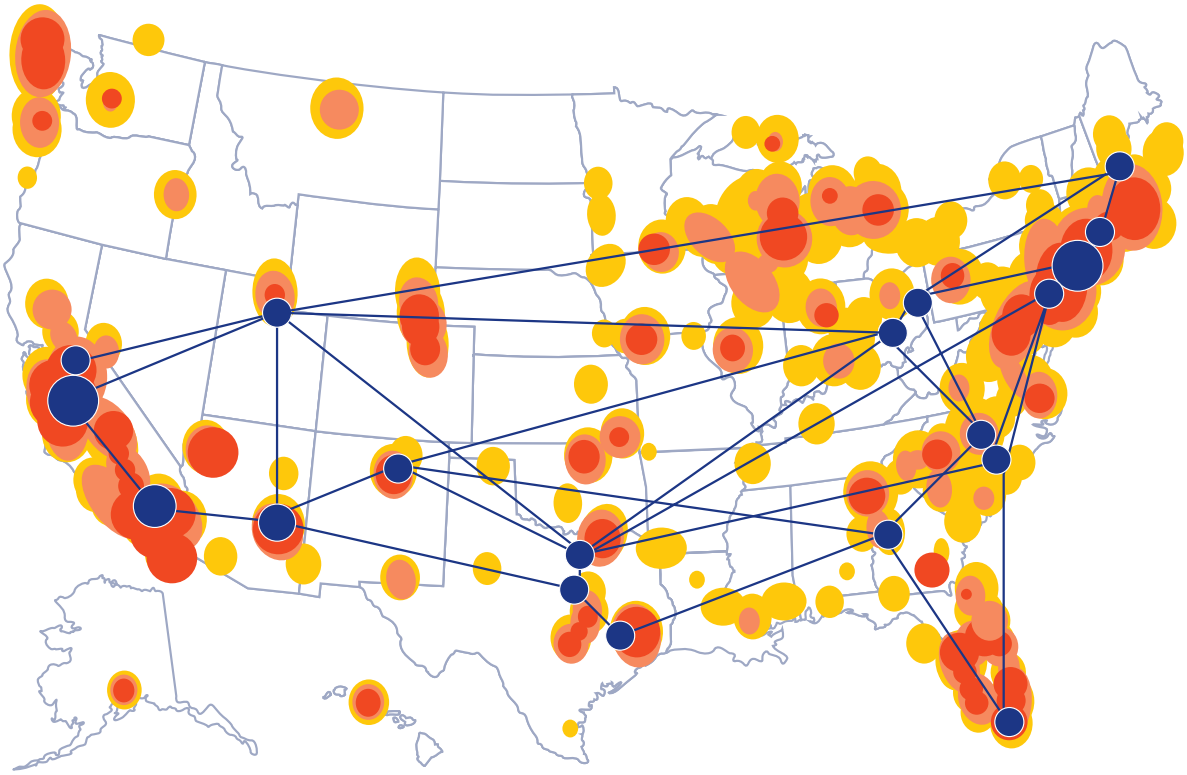
SOLUTION:
Nationwide safety net

Recognizing that this is a wish list more than a solution, it is worth defining and designing what a truly effective survivor safety net would look like and how it would operate.

Current Nationwide Safety Net for Survivors of IMB Trafficking ↓

Service providers would be connected around the country

Many survivors, having been moved by trafficking networks to towns across the country, prefer to return to major cities that have large populations of Korean and Chinese nationals, a comfortable community for them to reintegrate into. To accommodate this need, Polaris's Disruption Strategies team has been working to connect local service providers across the country and create networks that allow, for example, a service provider in New Mexico to feel comfortable in sending a survivor to an experienced and culturally-competent counterpart in San Francisco.



In many communities, those counterparts will not specialize in serving IMB survivors. There simply would not be enough of them to merit building this kind of expertise. Recognizing this reality, Polaris is working to both expand the knowledge of non-specialized networks and build coalitions of multiple organizations to form one, cohesive response team that collectively is able to provide a complete suite of services for survivors. This may mean drawing on translation, legal and case management expertise from three different organizations so that all potential survivor needs can be addressed when they need it the most.[186]

Key pieces of this coalition safety net include:

- **Culturally humble, trauma-informed interpreters:** An interpreter holds a pivotal role in building trust and feelings of safety with survivors, ensuring parties involved understand everything from slang terms to how psychological trauma manifests in survivors. If interpreters do not have this knowledge, they can, instead of building trust, inadvertently reinforce a trafficker's narrative of isolation and shame. If done right, interpreters can be the person to literally give survivors their voice throughout the justice and service provision processes.

- **Attorneys:** While there are not many law firms that specialize in working with trafficking survivors, there are pro bono attorney networks around the country that can help with immigration, criminal and civil relief. In order to cover the existing gaps in legal services for survivors of human trafficking in every state, these networks not only need to effectively coordinate with each other, they also need to connect with service providers that can make case referrals.

Building the National Safety Net

Over the course of 2016 and 2017, Polaris has been working to coordinate a National Safety Net for IMB trafficking survivors to ensure seamless access to services as survivors move from city to city.

The National Safety Net consists of a growing number of service providers who demonstrate cultural competency, use trauma-informed interpreters, and have at least a year of experience providing a full range of services to IMB trafficking survivors. This list of service providers is supplemented by organizations that provide portions of the services needed by survivors (for example, an organization that provides trauma-informed interpreters but not full case management for survivors).

Our work to connect service providers to other cities, particularly major port cities like New York City, San Francisco, and Los Angeles, means that survivors are able to receive appropriate services when they leave their trafficking situation, and continue receiving services if they choose to return to a city where they are more comfortable.[187]

Here are some examples of the successes the Survivor Safety Net has had over the period of 2016-17:

After Asian American Community Services, Inc. (AACS, Inc.) in Ohio worked with survivors for several weeks, each survivor expressed the desire to go to a different city. Some wanted to go to Los Angeles, some to San Francisco, and some to New York. Through the Survivor Safety Net, the service provider was able to connect to providers in each city. Each survivor was able to continue case management and support in her new city, while her new case manager stayed in touch with AACS, Inc. to continue working with the legal team on T visa applications. Three of the survivors have received their visas and have successfully completed GED and English classes.

Continuing on the next page →

Building the National Safety Net Continued

In another case, a service provider in an the East Coast state was called by law enforcement to help with potential survivors at an IMB. The provider contacted Restore NYC, a service provider in New York, to ask for assistance doing a culturally appropriate forensic interview. Restore NYC shared resources and best practices for serving IMB trafficking survivors, and the service provider in the East Coast state began coordinating services to meet her immediate needs. When the survivor asked to return to New York, she was immediately connected with Restore NYC to transition service provision. Upon her arrival, a representative from Restore NYC met her at the bus station and accompanied her to safe housing. Thanks to the Safety Net, the survivor is now receiving case management, counseling, and job training services in a city where she feels comfortable.

In Utah, code enforcement officials called a service provider to assist when they encountered a woman who was absolutely terrified of the routine inspection taking place at the business. Based on previous discussions with more experienced service providers, they were able to give culturally appropriate assessments and provide an interpreter familiar with this type of trafficking. After several days of building trust through the interpreter, the survivor revealed she had family in New York City but she was not sure if she could return there. The service provider reached out to Garden of Hope, a partner in New York, to help her travel back there to reunite with her family. After working with her Garden of Hope case manager, the woman further revealed that she was primarily fearful of her boss' continuous harassment and her confusion about the purpose and outcomes of the business inspection. She was assisted with safety planning, legal assistance, and counseling, especially about the fact that a business inspection did not mean she now had an arrest record. The services she received from RIC-AAU and Garden of Hope relieved her fears and have helped her to safely settle back in New York.

- **Job training:** While some service providers provide financial education and empowerment training, as well as job readiness training, there is a lack of programs that prepare clients to build careers outside of working in specific niche job markets like artisan craft production, cleaning services, and the food industry. As Anders Lisborg states in *Human Trafficking in Asia*, "Skills training programs are too often seen as a goal instead of a step that should lead to decent jobs and a real new livelihood opportunity."[188] What is needed are economic empowerment programs that prepare IMB survivors for real job opportunities with competitive salaries that provide full benefits so that the training is worthwhile. "Workers have told members of the San Francisco-based Newcomers CONNECT Project that they want to work at legal establishments and not have trouble with the Environmental Health Inspectors and getting citations. Of the 15 [women who had been in IMBs] who went through the Workers CONNECT Workshop, one is now working at a legal massage business, one went back to a bartending job. One moved out of the area and is enrolled in a nail salon/cosmetology school. Working without fear of managers or inspectors brings more stability to their lives. It's important to have a publically respectable job and income that provides independence, which reduces risk of vulnerable situations and exploitation."[189]

Conclusion

Ultimately, ending trafficking in IMBs begins with understanding that this is all of our problem and that we are all part of the solution. There are concrete steps we can all take to push for change.

Actions that the general public should **not** take include anything that would potentially harm trafficking victims, such as attempting to go in and investigate an IMB themselves, or setting up a protest outside an IMB. The goal is to move not towards quick-fix solutions, but toward lasting systemic change.

- **Shut down "happy endings" jokes.** If a friend makes one, take the opportunity to share what you know about human trafficking in IMBs. If you see one in a movie or on TV, write a letter or use social media to call it out.
- **Call out the press when they expose potential victims.** When you see an article reporting on a "prostitution arrest" at an IMB, and it shares the photos, names, ages, or any other identifying information of potential victims, write a letter to the editor asking the newspaper to recognize that human trafficking is common in IMBs and that the news outlet should adopt a policy that protects potential victim identities.

Sample letter to the editor

Here's a letter that our team recently had published in the Chicago Tribune.[190]

Don't expose potential trafficking victims

In your Aug. 11 article, "Oak Park massage parlors shut down after prostitution investigation; 4 face charges," you published the photos, names, ages, and home address information of the women who were arrested. Unfortunately, it's very possible that they are victims of human trafficking who need support and protection — not increased exposure and shaming.

Massage parlors are often illicit businesses that profit from the sale of trafficked women's bodies. The women in them may be tightly controlled by debt bondage, fear, and shame. Their immigration documents may be confiscated, they may be forced to live inside the business, and they may be threatened with harm to their families if they speak up. It takes careful work by law enforcement and trauma-informed service providers to make sure that the full story comes to light.

While law enforcement investigates, the press can help by keeping the potential victims' identities confidential. Instead of focusing on potential victims, why not report on known exploiters: the owners of the massage parlors, and the buyers who frequent them. You could easily publish photos of the businesses, instead of the women arrested. Maybe do a little investigation into who owns the parlors, how they advertise, and who frequents them. It's time to put media attention where it belongs — on exploiters, not potential victims.

- **Call your city council member or state legislator.** Your government works for you! Let your council member or representative know that you want your city or state to pursue a victim-centered, exploiter-focused approach to eliminating human trafficking in IMBs. Concerned citizens across the country, from Tampa, Fla.[191] to Santa Maria, Calif.[192] have been drawing attention to the issue and pushing their city councils to update laws. In Delaware, it took only one concerned constituent to be the spark that changed the law for the entire state.[193] A few committed people that want best practices and bring stakeholders to the table have been the primary factor that has led to success in more than 25 jurisdictions to date. Ask your representatives to contact Polaris for guidance on what proven strategies city councils and state legislatures across the country have been adopting. Show up at meetings, and keep the pressure on. Call your state representatives and demand funding and resources allocated to investigating IMB trafficking and supporting foreign-born victims trafficked in your state.
- **If your community has strong laws, make sure they are being enforced.** If you know your community has strong laws and is committed to an exploiter-focused, victim-centered approach, you can use your voice to help support enforcement and advocate for resources. Report suspected IMB trafficking when you see it to law enforcement, and call 311 to request that code enforcement inspect a business and provide support to any victims inside. You can also use your voice to call your state representatives and demand funding and resources allocated to investigating IMB trafficking and supporting foreign born victims trafficked in your state.
- **Support services for survivors**. Donate to your local service providers individually, or encourage your workplace or social groups to consider a donation, to ensure that service providers have the resources they need to help survivors of IMB trafficking.

At bottom, it is up to each and every one of us to examine our cultural assumptions; complacency; our own individual choices to purchase sex; to condone purchasing sex; to ignore people who do not look like us or talk like us; and to make assumptions and to turn away from what we do not want to see.

We can ignore modern slavery in our midst or we can call it out, and call it unacceptable, and call for help. Human trafficking in illicit massage businesses is complicated, and disrupting it will require more than making a few arrests. But solutions are available, if we are willing to look.

Methodology

This report seeks to describe the multifaceted experience of survivors, traffickers, buyers and others tangentially affected by illicit massage business trafficking. To this end, we have included extensive qualitative and quantitative research as described below. While we cite additional sources throughout the report, the sentiments are also corroborated by our internal data and methodology. All data was gathered lawfully, including following terms and services listed on sites used.

Demographic Data and Research

Polaris Direct Services & National Human Trafficking Hotline

Polaris operated a direct client services program from 2003 to 2016, providing case management and interpretation for 51 (primarily Korean) survivors of IMB trafficking. This work helped Polaris formulate an initial strategy and provided a baseline for additional research and data collection.

Focus Groups

The Disruption Strategies team participated in four focus groups from 2016 to 2017, hosted by RestoreNYC, each of which included four to six IMB survivors originally from China. These groups were led by social workers who had built a strong rapport and bonds of trust with the survivors. Groups focused on giving feedback on different tools being produced for potential victim outreach and service provider resources. By using this non-emotionally charged topic, Polaris was able to better understand common forms of force, fraud and coercion used in port cities as compared to the rest of the country. This included learning about how women were moved to different states and different networks, and what survivors identified as the most critical language to use and topics to discuss when they first come out of an IMB. This information helped to balance out the deeper narratives generated from the primarily Korean survivors served by Polaris' Client Services program.

Service Providers

Polaris has hosted focus groups and developed working relationships with service providers across the United States to develop a robust national knowledge of IMB network operations and survivor experiences. This collaborative of service providers has provided

quantitative and qualitative data about survivors and their exploiters after providing services to a collective total of 1,393 survivors over the past 18 months spanning 2016 and 2017.

Law Enforcement

Law enforcement officials have provided quantitative and qualitative data on 484 survivors and more than 375 businesses for this report. This dataset is used to present a more complete picture of all aspects of the IMB experience including business operations and trafficking methods, and is never intended to reveal law enforcement procedures, tactics or sensitive information.

Public Records

Demographic information was supplemented by public documents including 32 federal and state level criminal cases and 153 national and local media articles. Together these public documents identified more than 200 traffickers or trafficking network operatives. These records provide a deeper insight into trafficker countries of origin, their network connections, and how they used force, fraud and coercion to control their victims, supplementing knowledge gathered from the anti-trafficking field.

Media Articles

Polaris analyzed 21 months worth of IMB-related news coverage (583 articles collected from September 2015 to June 2017) to understand how cases were being reported, including whether victim-identifying information was shared (names, ages, photos, etc.). These articles also provided specific details about trafficking operations across the country, and notable trends across different regions of the United States.

Network Data and Research

Massage Business National and State Networks[194]

To understand the scope of national and state networks, Polaris began with a base dataset from commercial sex "buyer board" Rubmaps.com, filtered to remove legitimate establishments that were reviewed by buyers complaining of the lack of sexual services, as well as those businesses that had no reviews at all.

That dataset was expanded using Thomson Reuters CLEAR and open-source information including business records and registrations, news articles, tax filings, financial information, massage regulation board and authority requirements, commercial sex websites, Yelp, Groupon, and geospatial data. We were then able to visualize connections between businesses and key operatives, mapping networks of IMBs, businesses, shell companies, commercial and residential property, and people across the country. In total, analysts identified and compiled more than 60,000 pieces of data to analyze IMB networks across the country.

Recruitment Advertisements

Polaris used Google Translate to identify and roughly translate 17,791 ads that were active in July 2017 from California and New York, the two main ports of entry with some of the highest volume of IMB trafficking in the United States. While imperfect, these translations allowed us to identify trends and possible connections to IMB networks (based on listed phone numbers), to commercial sex websites, or to review and daily deals websites like Yelp, Living Social, or Groupon. For print, Polaris worked with a Mandarin-speaking translator to analyze 50 recruitment ads in the World Journal (a national Mandarin newspaper) and copies of Washington Chinese News (a Mandarin-language newspaper circulated locally to Polaris) that were published between August and November 2017. The translator also helped provide

interpretations for odd phrases or slang words found through Google Translate. A Korean-speaking Polaris Fellow researched a selection of online ads in 2016 and provided examples with translation to demonstrate fraud occurring within Korean ads.

50 State Legal Surveys

Massage Establishment Ordinances

There are more than 35,000 jurisdictions (cities, counties and states) throughout the United States with the ability to inspect and regulate massage establishments. The cities that do not have the ability to independently inspect and regulate establishments are unincorporated, meaning they are administered by a larger division (e.g. a township, county). Polaris researchers have systematically examined the laws on the books across every jurisdiction in the United States to determine the status of their local massage establishment laws. This analysis included determining whether or not a jurisdiction had an existing regulation, as well as analyzing all existing regulations for their utility. One measurement for utility, for example, is whether massage establishments are viewed as venues of physical health or were categorized as adult-oriented businesses, and whether they contain provisions that would enable a jurisdiction to bring civil penalties against trafficking venues. Researchers analyzed the laws in all U.S. states, counties, cities, and inhabited U.S. territories.

Shell Companies and Transparency

IMB networks sometimes include non-massage oriented commercial organizations. Often, these companies are shell corporations used to further the network's criminal enterprise. During the network mapping process, analysts reviewed the companies affiliated with IMB networks during the network mapping process to identify probable shell companies. Analysts then analyzed those shell companies on national and state levels to identify trends and develop insight into how these shell corporations function within IMB networks.

Although there are national laws that govern shell company registration and transparency, analysts also examined laws governing shell companies in key states. Laws were analyzed based on their provisions and how they were implemented, and were then compared against observed patterns of shell companies within known IMB networks.

Polaris Disruption Strategies

All Polaris Disruption Team research is initiated from and constantly informed by conversations with experts in the field (survivors, service providers, criminal justice professionals, legislators, financial professionals, and others). This iterative style of work allows us to identify best practices, lessons learned, and areas for further inquiry, and adapt our work based on the cutting edge information from the field.

The fact that illicit massage businesses operate in fully visible commercial storefronts sets them apart from most other types of sex trafficking, which take place outside the public eye. Registering as a business can serve as both a strength and a weakness for traffickers. Registering as a business allows them to advertise publicly on Backpage and Craigslist, use the cover of websites like Groupon and Yelp to appear legitimate, and easily launder money. The official business also provides its customers with a similarly convenient veneer of legitimacy. However, it also requires traffickers to provide information on publicly available business records. Despite traffickers' best efforts to obscure ownership by hiding behind shell companies and taking advantage of states and cities with weak business regulations, information from business records can still shed significant light on how IMBs are networked.

Endnotes

1 While there have been reports of men trafficked in IMBs, often also in the case of serving male clientele, these cases are in the minority, and information on them is currently anecdotal, based on a handful of press pieces and service provider case studies.

2 Dank, Meredith, Bilal Khan, P. Mitchell Downey, Cybele Kotonias, Debbie Mayer, Colleen Owens, Laura Pacifici, and Lilly Yu. 2014. Estimating the Size and Structure of the Underground Commercial Sex Economy in Eight Major U.S. Cities. *Urban Institute*.

3 A very conservative financial estimate was derived from a national average of 2 women per IMB. Again, using conservative reports, an average of 12 men will visit an IMB in a given day. Commercial sex review boards report that a standard visit nets the business $60 per customer. All told, an IMB can easily make $250,000 per year (rounding down to account for slower days). See *Methodology*, p. 79 of this report.

4 Bouche, V., & Crotty, S. (2017, September 27). Estimating Demand for Illicit Massage Businesses in Houston, TX. *Journal of Human Trafficking*. Retrieved from http://www.tandfonline.com/doi/abs/10.1080/23322705.2017.1374080?journalCode=uhmt20

5 *The Typology of Modern Slavery*. (2017, March 29). Polaris. Retrieved from http://polarisproject.org/typology

6 Client Findings from the Human Trafficking Intervention Courts (2015, October 21). *Restore NYC*. Retrieved from https://issuu.com/restorenyc/docs/clientfindingsreport_2014

7 The examples listed for force, fraud and coercion are meant to be illustrative, not an exhaustive list.

8 We use the term "work" throughout the report, with the understanding that we are referencing labor trafficking, not lawful, consensual employment.

9 Hoppa, K. (2017, December 08). Investigators raid Waco massage parlors, arrest woman in prostitution ring. Retrieved from http://www.wacotrib.com/news/police/investigators-raid-waco-massage-parlors-arrest-woman-in-prostitution-ring/article_082622cd-dec1-5846-b44e-fb02ec-6d0c0d.html

10 See *Shifting the Media Narrative to Increase Public Understanding, Decrease Public Tolerance*, p. 69 of this report.

11 Chicago massage. (n.d.). Retrieved from http://chicago.backpage.com/TherapeuticMassage

12 Mapping the Demand: Sex Buyers in the State of Minnesota (Rep.). (2017, August 2). Retrieved from http://uroc.umn.edu/sites/default/files/LLpercent20REPORTpercent20Mappingpercent20thepercent20Demand.pdf

13 Keyword Research, Competitor Analysis, & Website Ranking | Alexa. (n.d.). Retrieved from http://www.alexa.com

14 Retrieved from www.rubmaps.com. (2017, October).

15 Retrieved from www.rubmaps.com. (2017, October).

16 Celandine Day Spa in San Francisco, California. (n.d.). Retrieved from https://www.rubmaps.com/erotic-massage-celandine-day-spa-san-francisco-ca-4442#review-465077

17 When is It Safe to go Back?. (n.d.). *RubMaps Blog*. Retrieved from https://www.rubmaps.com/blog/when-is-it-safe-to-go-back-54

18 Green, S. J. (2016, July 14). Seattle police set up massage parlor in sex-sting operation, arrest 204 men. *Seattle Times*. Retrieved from http://www.seattletimes.com/seattle-news/crime/seattle-pd-arrests-155-men-in-massage-parlor-sting-operation

19 Keyword Research, Competitor Analysis, & Website Ranking | Alexa. (n.d.). Retrieved from http://www.alexa.com

20 Keyword Research, Competitor Analysis, & Website Ranking | Alexa. (n.d.). Retrieved from http://www.alexa.com

21 Bouche, V., & Crotty, S. (2017, September 27). Estimating Demand for Illicit Massage Businesses in Houston, TX. *Journal of Human Trafficking*. Retrieved from http://www.tandfonline.com/doi/full/10.1080/23322705.2017.1374080?scroll=top&needAccess=true

22 Thai and Vietnamese trafficking rings operate very similarly to Chinese and Korean rings, as illustrated by a major Thai trafficking ring operating out of several U.S. cities that was uncovered in May 2017. Davey, M. (2017, May 25). 21 Across U.S. Are Indicted in 'Modern-Day Sex Slave' Ring. *New York Times*. Retrieved from https://www.nytimes.com/2017/05/25/us/raid-sex-trafficking-thailand.html. While there have also been anecdotal reports in New York, Florida, Texas, California, and Arizona of women trafficked from Mexico, Central America, and South America, these operations are quite different. The women in these venues tend to be in their 20s and early 30s and may experience higher levels of violence than women from China or South Korea. The IMBs with women from Latin America tend to have different styles of criminal networking; different, often more extreme forms of controlling the women; and different buyer demographics.

23 These figures are based on demographic information from more than 1,000 survivors, 32 federal and state court cases, and more than 3,000 National Human Trafficking Hotline Cases. (See *Methodology*, p. 79 of this report).

24 Liu, M. (2011). *Migration, Prostitution, And Human Trafficking: the Voice of Chinese Women*. New Brunswick: Transaction Publishers, 2-3.

25 O'Neil Richard, A. (1999, Nov. 01). *Intelligence Monograph by CIA. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime*. See also, Zhang, S. (2007). *Smuggling and trafficking in human beings: All Roads Lead to America*. Westport, CT: Praeger, 36.

26 Apply for a U.S. Visa. (n.d.). Retrieved from http://www.ustraveldocs.com/kr/kr-niv-visawaiverinfo.asp

27 Business/Tourist Visa. (n.d.). Retrieved from http://www.ustraveldocs.com/cn/cn-niv-typeb1b2.asp

28 Choo, K., Jang, J. O., & Choi, K. (2010). Methodological and Ethical Challenges to Conducting Human Trafficking Studies: A Case Study of Korean Trafficking and Smug-

gling for Sexual Exploitation to the United States. *Women & Criminal Justice*, 20(1-2), 167-185.

29 See *Methodology*, p. 87 of this report. See also O'Neil Richard, A. (1999, Nov. 01). Intelligence Monograph by CSI. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, 6.

30 Lu, L. (2015). Empirical Evidences in Linking Guanxi, Renqing and Justice Theory: Doing Business in the Great China Area. *International Business Research*, 8(7).

31 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology*, 951.

32 Tan, C., & Wong, B.P. (2013). *Chinatowns around the world gilded ghetto, ethnopolis, and cultural diaspora*. Leiden: Brill, 96.

33 Email communication between Safe Center - Long Island and Polaris, November 9, 2017.

34 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology*, 92, 944-974, 957.

35 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology*, 92, 944-974, 944, 960-1.

36 Peiyi Woo, former Counselor at Restore NYC (2016-17), email communication between RestoreNYC and Polaris, November 9, 2017. See also Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology*, 92, 944-974.

37 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology*, 92, 944-974, 944, 960-1.

38 State v. Xu, 2016 WL 7337981 (Ohio Ct. App. 2016), *appeal denied* 2017 Ohio LEXIS 1226 (Ohio Ct. App., Delaware County, 2016). This recruitment tactic has been used for decades in IMBs. In a Washington, D.C. case in 1995, the victims "answered ads in local newspapers for restaurant jobs paying $1,000 to $2,700 a week but were picked up at the airport and taken to massage parlors and brothels and forced to work up to 15 hours a day." O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CIA. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, p. 21.

39 2017 internal review of 17,500 Mandarin-language ads.

40 Advertisement screenshot (2016, March 3). Retrieved from www.labamalba.com

41 2017 internal review of 17,500 Mandarin-language ads.

42 O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CSI. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, 11.

43 Heath, A. (2015, Nov. 1). An app you've probably never heard of is the most important social network in China. Retrieved from http://www.businessinsider.com/what-is-wechat-2015-10/#a-multi-billion-dollar-company-called-tencent-launched-wechat-four-years-ago-as-a-way-to-message-people-over-an-internet-connection-3

44 Screenshot. (2016, March 3). Retrieved from http://cafe.naver.com/gyopo/2554

45 See *Methodology (Recruitment Advertisements)*, p. 79 of this report.

46 Advertisements. (n.d.). *USA Life Online*. Retrieved from http://www.usalifeonline.com//f/bencandy.php?city_id=1&fid=254&id=183934

47 In port cities like New York City, San Francisco, and Los Angeles, it is common for victims to have greater freedom of movement, often living in their own apartments or in family hostels, which can act like controlled secondary housing. Once outside of these port cities, potential victims tend to be kept inside the business or in a more controlled location.

48 Safe Center - Long Island, e-mail communication, November 8, 2017. Quotes are anonymized to protect survivor safety and privacy.

49 Restore NYC, e-mail communication, November 8, 2017.

50 O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CSI. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, 11.

51 U.S. v. Sung Bum Chang, 237 Fed.Appx. 985 (2007).

52 Safe Center-Long Island, e-mail communication, November 8, 2017.

53 Safe Center-Long Island, e-mail communication, November 8, 2017.

54 December 2016 to April 2017 Survivor Focus Groups. (See *Methodology*, p. 79 of this report).

55 Lisborg, A. (2017). *Human Trafficking in Asia* (S. Yea, Ed.). S.l.: Routledge, 26.

56 Lee, J. Y. (Director). (2017). *Save My Seoul* [Video file].

57 Ramzy, A. (2016, May 14). China's Cultural Revolution, Explained. *New York Times*. Retrieved from https://www.nytimes.com/2016/05/15/world/asia/china-cultural-revolution-explainer.html

58 Plänkers, T. (2011), Psychic Impact and Outcome of the Chinese Cultural Revolution (1966–1976). A Psychoanalytic Research Project at the Sigmund-Freud-Institut, Frankfurt (Germany)1. *Int. J. Appl. Psychoanal. Studies*, 8: 227–238.

59 It should be noted that in this study, the researchers commented on how difficult it was to get the average Chinese citizen to participate in Western-style research interviews, which felt invasive for Chinese-born interviewers and interviewees. This reticence to disclose personal backgrounds to strangers is magnified for victims being interviewed about their trafficking experiences.

60 This information comes from United States v. Kyo Hwa Adler, et al., 06 Cr. 717 (AKH); United States v. Brown, No. 13-1706 (2d Cir. 2016); U.S. v. Kim, 347 Fed.Appx. 687 (2nd Cir. 2009); U.S. v. Kim, et al., Docket No. 1:06-cr-00605 (E.D.N.Y. 2006) ; U.S. v. Daneman, 347 Fed.Appx. 687 (2nd Cir. Oct. 2009) (also referred to as US v. Hyang Ran Kim); U.S. v. Jae Shim, Hyang Ran Kim, and U.S. v. Kim et al.(do Hyup Bae), Docket No. 08-1834-cr (2nd cir. 2009).

61 The Stubborn Cycle of Massage Parlor Trafficking. (2015, May 7). *Columbus Monthly*. Retrieved from http://www.columbusmonthly.com/content/stories/2015/05/modern-day-slavery.html. In Polaris's analysis of RubMaps reviews, buyers frequently state that they do not tip at all if not provided any sexual act.

62 Rauhala, E. (2017, February 7). Despite a new law, China is failing survivors of domestic violence. *Washington Post*. Retrieved from https://www.washingtonpost.com/world/asia_pacific/despite-a-new-law-

china-is-failing-survivors-of-domestic-violence/2017/02/02/ae7948a4-e31f-11e6-a419-eefe8eff0835_story.html

63 Winslow, R. W., & Zhang, S. (2008). *Criminology: a global perspective.* Upper Saddle River, NJ: Pearson/Prentice Hall, p. 69; Lin Han , S. (2017, June 1). China's New Domestic Violence Law: Keeping Victims Out Of Harm's Way? Working Paper, 4., Retrieved from https://law.yale.edu/system/files/area/center/china/document/domesticviolence_finalrev.pdf

64 Winslow, R. W., & Zhang, S. (2008). *Criminology: a global perspective.* Upper Saddle River, NJ: Pearson/Prentice Hall, p. 69; Lin Han, S. (2017, June 1). China's New Domestic Violence Law: Keeping Victims Out Of Harm's Way? Working Paper, 4. Retrieved from https://law.yale.edu/system/files/area/center/china/document/domesticviolence_finalrev.pdf

65 Winslow, R. W., & Zhang, S. (2008). *Criminology: a global perspective.* Upper Saddle River, NJ: Pearson/Prentice Hall, p. 443.

66 Winslow, R. W., & Zhang, S. (2008). *Criminology: a global perspective.* Upper Saddle River, NJ: Pearson/Prentice Hall, p. 445.

67 Focus groups with survivors in 2016 and 2017. (See *Methodology*, p. 79 of this report).

68 Rauhala, E. (2017, February 7). Despite a new law, China is failing survivors of domestic violence. Retrieved from https://www.washingtonpost.com/world/asia_pacific/despite-a-new-law-china-is-failing-survivors-of-domestic-violence/2017/02/02/ae7948a4-e31f-11e6-a419-eefe8eff0835_story.html?utm_term=.a3e879d3b26b (See *Methodology*, p. 79 of this report).

69 Focus groups with survivors in 2016 and 2017. (See *Methodology*, p. 79 of this report).

70 See *Methodology (Law Enforcement, RubMaps)*, p. 79 of this report.

71 Santistevan, R. (2016, June 30). Mesa massage-parlor slayer sentenced to death. *AZ Central.* Retrieved from http://www.azcentral.com/story/news/local/mesa-breaking/2016/06/29/mesa-massage-parlor-slayer-sentenced-death/86450710

72 O'Neil Richard, A. (1999, Nov. 1). *Intelligence Monograph by CIA. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime.*

73 Deutsch, K. (2016, May 14). DA: 3 plead guilty in Nassau sex trafficking. News Day. Retrieved from https://www.newsday.com/long-island/crime/nassau-da-3-plead-guilty-in-massage-parlor-sex-trafficking-1.11799567

74 Drane, A. (2016, September 21). Some Chinese restaurants pay immigrant workers less than minimum wage. *Daily Hampshire Gazette.* Retrieved from http://www.gazettenet.com/Gazette-investigation-finds-Chinese-restaurants-paying-undocumented-workers-less-than-minimum-wage-4686092

75 Based on composite information from dozens of survivors, service providers, and recruitment research.

76 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology,* 92, 950.

77 Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology,* 92, 945, 949.

78 Liu, M. (2011). *Migration, Prostitution, And Human Trafficking: the Voice of Chinese Women.* New Brunswick: Transaction Publishers; see also Hwang, K. (1987). Face and Favor: The Chinese Power Game. *American Journal of Sociology,* 92, 949.

79 Oral Argument, State v. Xu (Dec 16, 2016) No. 15 CAA 11 0091, Retrieved from https://law.justia.com/cases/ohio/fifth-district-court-of-appeals/2016/15-caa-11-0091.html

80 See *Methodology*, p. 79 of this report.

81 RestoreNYC, email communication, November 9, 2017.

82 Lee, J. Y. (Director). (n.d.). *Save My Seoul* [Video file].

83 Walker-Rodriguez, A., & Hill, R. (2011, March 01). Human Sex Trafficking. *Law Enforcement Bulletin.* Retrieved, from https://leb.fbi.gov/articles/featured-articles/human-sex-trafficking

84 Discussed at length in *Unmasking Shell Companies to Reveal Business Owners*, p. 56 of this report.

85 Winslow, R. W., & Zhang, S. (2008). *Criminology: a global perspective.* Upper Saddle River, NJ: Pearson/Prentice Hall, p. 448; Chinese triads have been identified in trafficking networks since the 1990's. "INS Rome has identified over 20 members of Asian organized crime groups who are trafficking and smuggling Asian women and children through Italy to the United States for prostitution." O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CIA. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, pp. 13, 14, 55.

86 Krause, K. (2017, September 20). Ex-car dealership manager admits to running Dallas brothels on the side. Dallas News. Retrieved from https://www.dallasnews.com/news/crime/2017/09/20/ex-car-dealership-manager-admits-running-dallas-brothels-side

87 Former Finance Manager at Trophy Nissan Pleads Guilty In Connection With Owning and Running Brothels in Dallas, Texas. (2017, September 20). *United States District Attorney's Office, Northern District of Texas.* Retrieved from https://www.justice.gov/usao-ndtx/pr/former-finance-manager-trophy-nissan-pleads-guilty-connection-owning-and-running

88 While this model of operation has been found in Polaris's recent fieldwork, this has been the trend observed since the early 1990's. According to a report published by the Center for the Study of Intelligence out of the Central Intelligence Agency (CIA) in 1999, a trafficking network "typically involves enforcers, transporters, recruiters, document forgers, brokers, brothel owners, and employment agencies. Brokers operate in the source country as well as in the United States." O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CSI. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, pp. vii, 14.

89 Bonvillian, C. (2015, December 07). 1 more in custody in Royal Spa human trafficking probe. Alabama News. Retrieved from http://www.al.com/news/huntsville/index.ssf/2015/12/1_more_in_custody_in_royal_spa.html

90 Nassau Woman, Her Mother Ran Sex Trafficking 'Massage Parlor' Business: AG. (n.d.). *New Hyde Park Patch.* Retrieved from https://patch.com/new-york/newhydepark/new-hyde-park-woman-ran-sex-trafficking-massage-parlor-business-ag.

91 State v. Xu, 2016 WL 7337981 (Ohio Ct. App. 2016), *appeal denied* 2017 Ohio LEXIS 1226 (Ohio Ct. App., Delaware County, 2016).

92 Scott, K. (2017, February 10). Police arrest St. George businessman in connection with massage parlor sting. *Cedar City News*. Retrieved from https://www.cedarcityutah.com/news/archive/2017/02/10/kss-police-arrest-st-george-businessman-in-connection-with-massage-parlor-sting/#.WeNkOGiPLIU

93 Scott, K. (2017, February 10). Police arrest St. George businessman in connection with massage parlor sting. *Cedar City News*. Retrieved from https://www.cedarcityutah.com/news/archive/2017/02/10/kss-police-arrest-st-george-businessman-in-connection-with-massage-parlor-sting/#.WeNkOGiPLIU

94 Chang, J., & Jesko, J. (2017, June 27). Inside the fight to take down online prostitution review boards. *ABC News*. Retrieved from http://abcnews.go.com/US/inside-fight-online-prostitution-review-boards/story?id=48308991

95 Rotation can vary by geographic region. This figure is based on conversations between Polaris and partner city law enforcement and prosecutors between January 2015 and April 2016. (See *Methodology*, p. 79 of this report).

96 Raymond, J. G., & Hughes, D. M. (2001). *Sex Trafficking of women in the United States: International and Domestic Trends*. Retrieved from https://www.ncjrs.gov/pdffiles1/nij/grants/187774.pdf The study relied on interviews (n=128) with "women who had been or are in the sex industry in the United States," and with professionals who had experience with cases or people in the "sex industry" including law enforcement, service providers, academic researchers, investigative journalists, and health care workers. See also *Methodology*, p. 79 of this report.

97 Based on composite information from dozens of survivors, service providers, court cases, and active recruitment ads. See *Methodology*, p. 79 of this report.

98 New York City Department of City Planning, Transportation Division. (2009). *Chinatown Bus Study*. Retrieved from http://www.nyc.gov/html/mancb3/downloads/cb3docs/chinatown_final_report.pdf

99 Baron, M. A. (2012, October 25). Former Annandale Massage Parlor Owner Pleads Guilty to Prostitution, Money Laundering. *Annandale Patch*. Retrieved from https://patch.com/virginia/annandale/former-annandale-massage-parlor-owner-pleads-guilty-tab481982d3

100 Pang, A. (2016, November 2). Who's in the Kitchen at Chinese Restaurants?: An Investigative Report, Part 1. *Truthdig*. Retrieved from https://www.truthdig.com/articles/whos-in-the-kitchen-at-chinese-restaurants-an-investigative-report-part-1

101 Pang, A. (2016, November 17). The Secret Cost of Chinese Buffets, Part 2. *Truthdig*. Retrieved from https://www.truthdig.com/articles/the-secret-cost-of-chinese-buffets-part-2

102 SuperUser. (n.d.). Las Vegas Massage Parlors Dirty Secret. *Bookmyvegas.com*. Retrieved from http://www.bookmyvegas.com/las-vegas-travel-tips/66-massage-services-las-vegas

103 Van Derbeken, J., & and Kim, R. (2005, July 2). Alleged Sex-trade Ring Broken Up in Bay Area: Police Say Koreans in Massage Parlors were Smuggled In. *SF Gate*. Retrieved from http://www.sfgate.com/bayarea/article/Alleged-sex-trade-ring-broken-up-in-Bay-Area-2624979.php; see also USA v. Young Joon Yang. (2005). Retrieved from www.humantraffickingdata.org/search/794

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105 Examples of this tactic date back to at least 1994, as noted by the CIA in a case where "traffickers used several staging areas in New York's Chinatown, Brooklyn, and Connecticut [...] The women were later shuttled around to various brothels in New York. Some were also sent to Los Angeles, San Francisco, Dallas, Philadelphia, Charlotte, Connecticut, and Kentucky." O'Neil Richard, A. (1999, Nov. 1). Intelligence Monograph by CSI. International Trafficking in Women to the United States: A Contemporary Manifestation of Slavery and Organized Crime, p. 11.

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To get help, report a tip, or request information or training, call the "National Human Trafficking Hotline at 1-888-373-7888 or send a text to Polaris by Texting HELP to BEFREE (233733).

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