

SNAPSHOT – FACTORS OF SUCCESSFUL MESSAGE ORDINANCES

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Cities that have successfully used ordinances to create an inoperable environment for illicit massage businesses (IMBs) as part of their anti-human trafficking efforts have a balance of effective prevention and strong enforcement measures. First, they focus on preventing the initial establishment of IMBs via rigorous application processes that check applicants' backgrounds and certify their licenses. Second, they implement swift, tough corrective measures for ordinance violations to sustain impact. Heyrick reviewed massage ordinances from cities around the country and conducted interviews with police departments, city councils, and code enforcement officials to find the common elements in jurisdictions that have deterred IMBs from operating there. To add rigor, we checked the claims of local officials and media reports against our own data: cities with highlighted successes below are those where our data shows either the significant reduction or the elimination of IMB presence since the passage of their ordinances.

ORDINANCE PROVISIONS

According to our research and interviews, ordinances contain provisions that generally fall into the 2 equally important categories of preventing the opening of IMBs via a thorough application process and/or attempting to regulate characteristics and behaviors associated with IMBs.

1. **Characteristic/Behavior-based components:** These elements¹ regulate the characteristics and behaviors that set IMBs apart from legitimate massage businesses to create an inoperable environment for storefronts selling commercial sex, or at least to provide legal grounds to inspect and investigate suspect enterprises. Jurisdictions often seek to prohibit behaviors known to be red flags for IMBs such as late operating hours, ads placed on websites catering to commercial sex buyers, and/or workers living onsite.
2. **Preventative components:** These elements focus on a rigorous application process with background checks and stipulate that massage businesses must satisfy certain requirements to obtain a local license before opening. This allows law enforcement to check for criminal history, verify state massage licenses and other credentials, and ensure that the businesses—and the names and phone numbers affiliated with them in the applications—are not advertising illegal services on adult-entertainment websites.²

PREVENTATIVE ELEMENTS

Jurisdictions with solid preventative measures have reported that suspected IMBs either voluntarily dropped out of the application process or closed once an ordinance was passed, even before enforcement mechanisms went into effect. While local licensing requirements vary, a best practice is to confirm that all employees—not just the owner on record—are licensed, do not have criminal records related to prostitution or human trafficking, and are not affiliated with illicit activities elsewhere, including in online commercial sex ads. In some locations, massage business owners wishing to obtain a license must appear in person to submit their credentials and plan or accept a home visit and interview. Another best practice is to request timely notification of all personnel changes that includes new employees' licensing information, as IMBs frequently rotate their employees.

- In 2016, Johnston, Iowa implemented an ordinance³ requiring an application process that details the credentials and backgrounds of all employees who will be working at the location, including massage license numbers issued by the state. In addition, the application is followed up by an in-person interview. Heyrick could find no IMBs listed on sex buyer review sites for Johnston since 2016.

¹ <https://www.ktvq.com/news/local-news/billings-city-council-passes-massage-ordinance-designed-to-fight-human-trafficking>

² <https://iowanah.org/wp-content/uploads/Johnston-Massage-Therapy-Ordinance-Case-Study-Examples-2016-17.pdf>

³ <https://www.cityofjohnston.com/DocumentCenter/View/4111/Massage-Therapy-Business-License-Ordinance-Revision---Ordinance-No-980-?bidId=>

- The California Massage Therapy Council (CAMTC) recommends that businesses be required to keep updated lists with their city authorities of *all* personnel, instead of only massage therapists, as unlicensed workers sometimes claim to be cleaning crews, cooks, or receptionists during inspections or law enforcement operations. CAMTC also recommends that businesses be required to keep original copies of all licenses on premises to avoid the illegal copying/duplication of credentials: something multiple state massage boards have noted as a persistent problem.
- In Woodstock, Georgia, a pre-licensing inspection at one business in 2018 turned up an unlicensed worker, 2 naked clients, and other violations—all before a license to operate had been granted. The city ultimately denied the owner’s application to operate within city limits.⁴ While most pre-licensing inspections are less eventful, they often uncover red flags that help city officials make informed decisions.

ENFORCEMENT-FOCUSED PROVISIONS

It is often difficult to close IMBs once they have opened and doing so can take significantly more time and resources than preventing them from opening in the first place. Depending on the laws, even if owners and employees are committing multiple code violations, the business may be subject only to small fines or other penalties that lack the severity to close it. Additionally, law enforcement may not be authorized to enter or inspect businesses without probable cause, leaving them dependent on citizen tips to investigate suspect locations. Our analysis indicates that ordinances that allow unannounced city inspections, and contain swift and meaningful accountability measures when violations are identified, have been the most impactful.

- In several Des Moines suburbs, businesses where unlicensed workers are caught giving massages are immediately closed and a placard telling customers that the business may not operate until it has obtained the necessary licenses is posted.⁵
- In Cedar Rapids, Iowa, multiple massage businesses were closed in the first half of 2019 for further investigation after police found indications of illicit activity online.⁶ ⁷ Heyrick’s data shows a nearly 60% drop in IMBs in Cedar Rapids since its ordinance passed in November 2018.
- In Aurora, Colorado, multiple IMBs predated the passage of its ordinance in May 2018. By allowing the city to close businesses for committing certain violations, such as operating without a license, Aurora closed 18 IMBs within a year after its regulations went into effect, according to local media reports. According to Heyrick’s data and interviews, in the past three years Aurora has achieved at least a 93%, and likely a 100%, closure rate.

OVERCOMING CHALLENGES TO BUILD SUSTAINABLE INITIATIVES

In our research, we found two main challenges that can undermine even well-written ordinances: (1) Enforcement that is not sustained in the long term, sometimes often due to the turnover of key leaders in the police department or local government; and (2) Displacement effects inadvertently increase IMB presence in neighboring communities. Both challenges are surmountable.

- **Continuous enforcement:** Interviewees from multiple states indicated that the success of ordinances depended on sustained enforcement. In some cases, once an initial champion retired or changed roles, successors did not prioritize these regulations, creating an environment for the re-entry of IMBs. In some places, annual reviews or inspections are mandated in the regulations to try and ensure longevity.
 - Cities like Springboro, Ohio and Johnston, Iowa review massage businesses each year; this allows them to practice a 2-zone defense where some businesses are prevented from opening, while those that open in disregard of local regulations are more likely to be identified and closed quickly.

⁴https://www.tribuneledgernews.com/ledger/july-massage-denied-business-license-after-violations/article_3852e320-b761-11e8-8c35-bf81cf03e980.html

⁵<https://www.desmoinesregister.com/story/news/2018/12/17/massage-therapists-iowa-state-license-work-des-moines-prostitution-human-trafficking-beaverdale/2342923002/>

⁶ <https://cbs2iowa.com/news/local/cedar-rapids-discovers-non-compliant-massage-businesses-through-new-ordinance>

⁷ <https://www.kcrg.com/content/news/Two-businesses-advertising-massages-accused-of-prostitution-561481971.html>

- Troy, Michigan reduced its IMB presence from 4 in November 2017, the date of its ordinance, to 1 as of August 2021. The city has taken a proactive approach to enforcement, judging from local media coverage.⁸
- Roswell, Georgia was an early adopter of a massage ordinance in 2004, but according to local media,⁹ is aware that results have not been maintained long-term and its city council has discussed the need for stricter licensing requirements. As of August 2021, Roswell had 15 IMBs, according to Heyrick's data.
- **Enlisting allies to prevent spillover effects:** Some cities that had significant initial success with their ordinances heard complaints of increased IMBs in neighboring communities due to displacement. Subsequently, these jurisdictions began engaging in outreach¹⁰ to encourage and assist their neighbors in joining their efforts, broadening the impact by creating larger geographic areas with shared initiatives. However, regional efforts are only as effective as their weakest link, so it is essential to have all cities equally committed to tested prevention and enforcement mechanisms.
 - After Aurora's ordinance went into effect, some IMBs simply moved to Denver and its other suburbs.¹¹ In response, officials in Aurora assisted neighbors with developing their own responses across the greater Denver metro area. Several other suburbs passed ordinances modeled on Aurora's the following year,¹² as did the City of Denver in July 2021.
 - Multiple suburbs of Dayton, Ohio, passed similar ordinances between 2018 and 2020.¹³ The cities of Kettering and Springboro, among others, now require application processes with background checks, unannounced inspections, and requirements for the state licensing of all employees. Kettering and Springboro had no IMBs as of August 2021, according to Heyrick's data.

SUMMARY OF BEST PRACTICES

The combination of strong pre-emptive processes and sustained, impactful enforcement has met with success in both large and small cities. We encourage communities that have met with success to continue assisting others in developing regulations and enforcement plans based on lessons learned. Based on our research, Heyrick highlights the following best practices:

- City inspectors should be able to make unannounced visits to suspected IMBs, as is done with health code inspections of restaurants, hotels, and other types of businesses; pre-scheduling allows for the moving of workers and the hiding of evidence.
- City officials should be empowered to close businesses on the spot for certain violations, such as unlicensed employees giving massages, sexual activity, and evidence of women living on premises.
- Ordinances should require that the city be notified of personnel changes promptly, given the frequent rotation of victim workers in IMB settings.
- When neighboring communities present a unified front, it is harder for sex buyers to easily find nearby IMBs. The larger the covered geographic area, the harder it will be for IMBs to retain their clients.
- Communities may want to study options for information-sharing about applicants who have been denied licenses or shut down due to criminal activity and/or false statements in other jurisdictions. Interviewees told us that applicants affiliated with IMBs have lied about past arrests and license revocations on their paperwork. Some states lack statutes that would allow cities to access federal information for background checks; amending this would help identify traffickers as they move between states and allow for the tracking of broader patterns and histories of their criminal enterprises.

⁸ <https://www.candgnews.com/news/seven-arrestedin-connectionwith-prostitution-at-troy-massage-parlor-107951>

⁹ <https://www.ajc.com/news/local/alpharetta-clarifies-business-rules-for-spas-massage-parlors/X78mNLPfJapbvjJYPuzsKJ/>

¹⁰ <https://apnews.com/article/a98f20c023e7478288f3e7b3bec2cd13>

¹¹ <https://www.9news.com/article/news/investigations/businesses-shut-down-for-suspected-human-trafficking-in-aurora-reopen-just-a-few-miles-away/73-555df664-b8de-404a-92b2-0e32ad7be92f>

¹² <https://krdo.com/news/2021/05/06/colorado-cities-find-success-with-ordinances-aimed-to-shut-down-illicit-spas/>

¹³ <https://www.daytondailynews.com/news/beavercreek-cracking-down-on-sex-trafficking-with-new-massage-parlor-legislation/4MAQECVH3JGDTNEOHMKYUE5WEE/>

- The passage—or pending passage—of a well-crafted ordinance coupled with a good public messaging campaign can have a strong preventative effect: officials from multiple cities reported that some suspected IMBs voluntarily closed prior to enforcement.^{14 15}
- Ordinances can be combined with other anti-IMB efforts. Billings, Montana had already reduced its IMBs by a third via a landlord engagement project in the two years prior to passage of its ordinance.

¹⁴https://destinyhosted.com/bilmtdocs/2021/CCWS/20210119_1132/7820_MESSAGE_BUSINESS_LICENSE_ORDINANCE_DRAFT_-_1.15.2021.pdf

¹⁵ <https://www.eastbaytimes.com/2015/04/27/santa-clara-county-cracks-down-on-massage-parlors/>

SNAPSHOT – PROSECUTING IMI NETWORKS MORE EFFECTIVELY

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Prosecutors often face unappealing options when trying to bring illicit massage business (IMB) owners to justice for their involvement in sex trafficking. Combatting IMBs using prostitution cases can be perceived as not being worth the time and effort because of light penalties and the speed at which these businesses reopen; in addition, there is a growing realization that this method penalizes victims more than traffickers. Sex trafficking cases, while carrying harsher penalties, are often difficult to prove,¹ in large part because they rely heavily on the testimony of victims who are often reluctant to testify. Heyrick Research and Street Grace have interviewed law enforcement officers and prosecutors around the country to identify underutilized means of building successful multi-charge cases against illicit massage industry (IMI) networks, and how doing so can lead to highly impactful prosecutions against traffickers in a manner that is less traumatic for those who have been victimized.

THE LIMITATIONS OF PROSTITUTION CHARGES

While prostitution charges are easier to prove than human trafficking and related financial crimes, even successful prosecutions can leave much to be desired in terms of impact. Penalties for prostitution are usually not severe, and often focus on lower-level employees/those potentially being victimized instead of the beneficial owners of IMBs, leaving the owners free to simply find more workers and continue operations with little pause. Even more problematic, approaching IMI networks in this way leaves the proceeds from exploitation in criminal hands. Prostitution, pimping, pandering, promotion and other names are used differently in different states to describe the acts associated with being sold, buying, and managing commercial sex acts. Here we are particularly speaking about charges aimed at those being sold or low-level managers who in some cases are also being exploited. IMI networks and operational plans are often set up in a way to ensure that those being victimized will plead guilty rather than speak out. In recent press articles, the ethics around investigations that center around Vice officers engaging in sexual acts with individuals that are likely being victimized have been called into question.²

CHARGE OUTSIDE THE BOX

Heyrick Research and Street Grace assess that very few IMBs are the stand-alone “mom and pop” businesses they are commonly perceived to be. Our research indicates that more often, there are groups of criminals behind business networks that can include not only IMB storefronts, but other types of commercial sex venues as well as legitimate businesses used to help launder illegal proceeds.³ Because of the number and range of crimes that IMI networks commit, there are myriad options for pressing both criminal and civil charges apart from—or in addition to—sex trafficking and/or prostitution. Pursuing more comprehensive cases against these criminal networks increases the possibility of successful prosecutions, increases potential penalties—including asset seizures—for traffickers, and moves away from reliance on victim testimony to focus more on financial and other paper trails.

- **Tax evasion:** Checking for the filing and payment of taxes and comparing claimed income against bank records, real estate, and other assets is less labor-intensive than investigating the laundering of proceeds, does not depend on witness testimony, and can help boost a case with charges that are likely to meet with success even if trafficking charges do not.⁴⁵⁶ Anecdotal reports suggest that it is common for IMB owners to substantially underreport their income, frequently claiming to make \$15,000 or less per year, possibly to stay below thresholds required to claim tax credits and other benefits.
- **Money laundering:** In demand studies conducted by academics and non-profits, IMB storefront revenue estimates ranged from \$277,000 to \$1.2M a year. Traffickers use myriad ways to hide, move, and launder illegal proceeds. Some, such as underground money remitters, money orders, and the use of casinos are difficult to track. However,

traffickers also tend to keep numerous accounts and safety deposit boxes in U.S. financial institutions, leaving auditable trails of at least some earnings as well as red flags such as Suspicious Activity Reports (SARs).

- **Promotion of prostitution:** Unlike many other types of criminals, traffickers in Chinese-owned IMBs⁷ tend to keep the same phone number for years because it is attached to their WeChat ID. Because of this, it is often easy to connect phone numbers from sites advertising commercial sex to IMB owners and managers, aiding in pressing these charges, which are felonies in most states.^{8,9}
- **Pimping/Deriving support from proceeds of prostitution¹⁰:** In part because of its increased association with sex trafficking, some jurisdictions have made this a felony and/or implemented minimum sentences.¹¹ For example, in Massachusetts a conviction on this charge has a minimum jail sentence of two years without possibility of probation, parole, or deduction for good conduct. A woman convicted there in 2018 of operating IMBs in 6 different towns was charged with 6 counts of deriving support from prostitution; 5 of which resulted in conviction.^{12,13}
- **Pandering/Purchasing sex:** Operations that focus on the demand that fuels the exploitation within IMBs often garner a lot of attention aimed at buyers that can have an impact on the flow of money into the IMBs.^{14,15,16} Surveillance coupled with traffic stops and interviews has led to arrests of buyers.
- **Labor law violations:** While trafficking can be difficult to prove, especially without witnesses willing to testify, it is often possible to demonstrate labor law violations without testimony. IMB owners frequently fail to file I9s and other employee tax documents or obtain required insurance for workers or businesses, and deliberately misclassify employees to avoid paying withholdings. One state prosecutor called pursuing labor violations “an extremely promising avenue” against the IMI. Victims may also be more willing to testify about wage and hour violations, and the use of force, fraud, or coercion to compel their massage work as well as substandard working conditions if they do not have to discuss the sexual aspects, which often carry a strong cultural stigma and feelings of shame.
- **RICO/Racketeering:** IMBs are a perfect example of repeated, related crimes linked to a business. Several states detailed below have used state-level or federal racketeering laws against IMI networks, linking several of the aforementioned crime types for greater accountability.
- **Conspiracy:** In cases in Minnesota¹⁷ and Kansas¹⁸, charges of conspiracy were added to IMI network cases to include crimes that defendants were working toward but had not yet completed.
- **Invasion of Privacy:** Many states have laws forbidding the video recording people without consent where they have a reasonable expectation of privacy; 19 states specifically have laws against non-consensual recording of the intimate parts of nudity of another person. Fifteen states explicitly forbid recording without consent on private property. Yet, it is common practice for IMBs to have cameras installed in massage rooms.
- **Unlicensed health and medical services:** Some states classify Licensed Massage Therapists (LMTs) as healthcare providers, meaning that offering massage services without correct licensing carries potentially serious penalties. King County, Washington and Delaware County, Ohio have both used these laws in an IMI context: in Ohio, twin sisters who owned multiple IMBs were convicted of 3 felony counts each of practicing medicine without a license.¹⁹
- **Consumer Protection:** Where applicable, charges under states’ deceptive trade practice statutes can be brought by agencies such as the office of the attorney general. Texas has a specific deceptive trade practice provision that covers both unlicensed massage and massage establishments that operate in violation of local laws and ordinances. When brought by the Texas Attorney General, these actions carry very significant civil penalties. In addition, 21 states have statutes requiring a massage license to advertise “massage” and 18 others require a license to advertise “massage therapy.” Only a handful (KS, NE, NJ, OH, VA, WY) of states do not regulate massage advertisements. These statutes can be used to seek civil penalties and, because in many states false advertisement ties into consumer protection, it may be possible to leverage these statutes to obtain even higher fines and penalties.²⁰

OVERCOMING COMMON CHALLENGES

To successfully move towards a more holistic model of IMI network prosecutions, some rethinking of how trafficking cases are delegated, investigated, and prosecuted is necessary. Human trafficking police units and prosecutors do not always have experience building financial cases; while those focused on organized or “white collar” crime may lack

experience with interacting with victims in culturally sensitive, trauma-informed ways. Both skill sets are essential. The idea of having a choice between—or both to apply—may seem like a luxury outside of major cities. Nonetheless, our interviewees reported that a broad case approach can be highly successful anywhere with effective collaboration, even if some scoping is needed. Policies that encourage collaboration between local, state and federal entities, and between white collar and sex crimes experts, with victim service professionals with appropriate cultural aptitude and linguistic support, can help move the needle towards more victim-centered, impactful prosecutions.

- IMI networks, unless very small, rarely heed jurisdictional boundaries. This can present challenges, particularly when different jurisdictions take different approaches to IMBs. However, among our interviewees were multiple examples of cities working with state authorities, state authorities working with federal agencies, and local authorities collaborating across county or state lines. Most interviewees emphasized simple principles of respect and courtesy when reaching out and working across these boundaries as laying the foundation for successful outcomes.
- We heard repeatedly from interviewees that two types of experts were in particularly short supply: financial investigators and interpreters, and how they navigated local limitations in these areas.
 - Multiple state prosecutors said that federal involvement was essential for specialized financial skill sets: assistance from DOJ, the IRS, etc. provided additional staffing and expertise when pursuing money laundering charges. Other state-level prosecutors emphasized that they are an available resource for smaller cities or counties. All stressed that creating a larger network was a key to success.
 - Interpreters can be hard to come by, particularly in smaller or less diverse jurisdictions. In some states, interpreters must be certified, further shrinking the pool. In addition, in two cases where victims provided testimony, maintaining contact and looking after their needs was as important as language fluency. Successful prosecutors tapped community groups, service providers outside their immediate area, and even academics to provide extra assistance with linguistic and cultural understanding.
- We would be remiss if we did not speak directly to concerns about the expense of large, long-term cases. The IMI, like drug trafficking, is a cash-heavy industry where large amounts of currency are often found onsite at storefronts and at associated residences. Network leaders often stash bulk cash to later send overseas via legitimate or underground remitters, launder at other cash-based businesses like casinos, and/or purchase real estate and luxury goods. New laws, as well as training regarding existing forfeiture and seizure laws²¹ can help agencies offset the costs of complex cases, in addition to hitting these organizations where it hurts their operations most: in the bank account.
 - According to the National Conference of State Legislatures, between 50% and 100% of asset seizures go to law enforcement; though in some cases there are further stipulations regarding how the money may be used.²² In applicable jurisdictions, this may help defray the costs associated with long-term anti-trafficking investigations and cases.
 - An online review of press regarding cash seizure amounts from IMI networks easily found a number of seizures in the tens or hundreds of thousands of dollars.^{23,24,25,26,27,28} In the Massachusetts case, \$300,000 was found at the defendant’s residence.

EXAMPLES OF SUCCESS

Here are examples of successful multi-charge prosecutions of IMI networks, many of which included use of state or federal racketeering statutes. Prosecutors in several states noted that federal involvement was essential for additional bandwidth in areas where in-demand expertise like financial analysts/ forensic accountants or additional linguists were needed.

- In **Ohio** in 2015, two sisters who owned 3 IMBs were sentenced to 10 years each after state prosecutors charged them with corruption, promoting prostitution, money laundering, and practicing medicine without a license.²⁹

- **Denver** successfully prosecuted a state-level RICO case named “Bad Apple” in 2020, ultimately bringing 33 charges against 7 defendants that included racketeering, conspiracy, tax evasion, filing false tax returns, money laundering, pimping, pandering, and keeping a place of prostitution.³⁰
- **Delaware, in coordination with DOJ, brought** charges against trafficker Da Zhong Wang, who was found guilty on 3 racketeering counts under Delaware’s Organized Crime and Racketeering Act in 2019.³¹
- **Florida and Pennsylvania** partnered with several federal agencies to bring multiple charges against a Pensacola trafficker with IMBs in at least 3 states,^{32, 33} as did **Minnesota** in a very large case against a Thai network that eventually resulted in the indictments and sentencing of 36 defendants with the help of HSI, DOJ, the IRS and Diplomatic Security as well as various state and local authorities.³⁴
- In **Ventura County, California**, information uncovered during the 2019 execution of an arrest warrant led police from a single arrest to a 5-person IMI network takedown. The subject of the original arrest warrant was sentenced to 11 years in jail in May 2021 on charges of human trafficking, tax evasion, and money laundering. In addition to large amounts of cash, investigators seized 36,000 condoms from a storage unit³⁵, which helped prove commercial sex activity as well as indicate the scale and profitability of the group’s enterprise.

The IMI is a densely-layered, multi-faceted problem that—at present—is growing rather than shrinking. Significant progress can be made, however, by stepping away from conventional approaches, and examining the vulnerabilities that are exposed once we begin thinking of individual IMBs as parts of much larger criminal networks whose goal is maximizing illicit profits. The overall goal is to stop the IMI; in some cases this may mean foregoing seeking trafficking cases to focus on civil or financial violations. Doing so can reap big rewards, both in asset seizure (which in turn can fuel additional operations) and reduced victimization overall.

¹ Philip Marcelo. “State prosecutors struggle with human trafficking cases.” *Associated Press*, May 26, 2019.

<https://www.boston.com/news/local-news/2019/05/26/state-prosecutors-struggle-with-human-trafficking-cases/>

² Cara Kelly, Erin Mansfield, Brenna Smith. “The Atlanta shooting put a spotlight on the vulnerability of spa workers.” *USA Today*, March 31, 2021. <https://www.usatoday.com/story/news/investigations/2021/03/31/georgia-spa-shootings-highlight-worker-vulnerability-threat-arrest/4802368001/>

³ Robert Wilonsky. “How vice cops linked Southlake’s popular Dragon House to a Dallas massage parlor and beyond.” *The Dallas Morning News*, November 7, 2019. <https://www.dallasnews.com/news/commentary/2019/11/07/following-the-money-trail-cops-used-to-link-dallas-jade-spa-to-southlakes-dragon-house-and-beyond/>

⁴ Ryan Brown. “Hawley couple charged with multiple tax crimes.” Minnesota Dept. of Revenue, May 7, 2021.

<https://www.revenue.state.mn.us/press-release/2021-05-07/hawley-couple-charged-multiple-tax-crimes>

⁵ Gretchen Frazee. “Two Columbus massage parlors shut down for tax evasion.” *Indiana Public Media*, March 2, 2012.

<https://indianapublicmedia.org/news/columbus-massage-parlors-shut-tax-evasion-27460.php>

⁶ Ron Russel. “Professor faces prostitution count, 2 charges of evading state taxes.” *Los Angeles Times*, April 30, 1988.

<https://www.latimes.com/archives/la-xpm-1988-04-30-mn-2087-story.html>

⁷ Heyrick’s research suggests that the majority of IMBs are owned and operated by Chinese nationals, though there are also examples of South Korean, Thai, Vietnamese and Latin American IMI networks.

⁸ Pimping and Pandering Laws. *FindLaw*, last updated March 20, 2019. <https://www.findlaw.com/criminal/criminal-charges/pimping-and-pandering-laws.html>

⁹ In some states, like Arkansas, the degree of the charge makes a difference; e.g. a 1st-degree charge is a felony while a 2nd degree charge is a misdemeanor.

¹⁰ Amanda Batchelor. “‘Good Massage’ couple arrested on prostitution, money laundering charges.” *Local10.com*, February 19, 2020. <https://www.local10.com/news/local/2020/02/19/good-massage-couple-arrested-on-prostitution-money-laundering-charges/>

¹¹ DOJ published model state legislation on this as part of the 2008 update of the Trafficking Victims Protection Reauthorization Act: <https://www.justice.gov/olp/model-state-provisions-pimping-pandering-and-prostitution>; see also, Georgia, OCGA § 16-6-13

¹² Press release. “2 arrested in connection with extensive criminal enterprise involving human trafficking.” U.S. Immigration and Customs Enforcement, May 14, 2013. <https://www.ice.gov/news/releases/2-arrested-connection-extensive-criminal-enterprise-involving-human-trafficking>

- ¹³ According to local press, the defendant was also convicted of six counts of Trafficking of Persons for Sexual Servitude; six counts of Conspiracy to Traffic Persons for Sexual Servitude; five counts of Deriving Support from Prostitution; five counts for Keeping a House of Ill Fame and four counts of Money Laundering. <https://medford.wickedlocal.com/news/20181220/medford-woman-found-guilty-in-human-trafficking-scheme>
- ¹⁴ Tom Winter. "Robert Kraft prostitution charges dropped by Florida prosecutors." *NBC News*, September 24, 2020. <https://www.nbcnews.com/news/crime-courts/robert-kraft-prostitution-charges-dropped-florida-prosecutors-n1240964>
- ¹⁵ Sara Jane Green. "Seattle police set up massage parlor in sex-sting operation, arrest 204 men." *Seattle Times*, July 14, 2016. <https://www.seattletimes.com/seattle-news/crime/seattle-pd-arrests-155-men-in-massage-parlor-sting-operation/>
- ¹⁶ Brian Rogers. "HPD prostitution sting nets Houston cop among 139 clients." *Houston Chronicle*, October 26, 2017. <https://www.chron.com/news/houston-texas/houston/article/HPD-prostitution-stings-includes-Houston-cop-and-12308727.php>
- ¹⁷ Press release. "Thirty-Six Defendants Sentenced for Their Roles in International Thai Sex Trafficking Organization." Department of Justice, June 10, 2021. <https://www.justice.gov/usao-mn/pr/thirty-six-defendants-sentenced-their-roles-international-thai-sex-trafficking>
- ¹⁸ Luke Ranker. "Topeka massage parlor bust typical of trafficking investigations." *The Topeka Capital-Journal*, July 10, 2018. <https://www.cjonline.com/news/20180710/topeka-massage-parlor-bust-typical-of-trafficking-investigations>
- ¹⁹ Glenn Batishill. "Women convicted in massage parlor case sentenced on trafficking charges." *Delaware Gazette*, October 17, 2015. <https://www.delgazette.com/news/3498/women-convicted-in-massage-parlor-case-sentenced-on-trafficking-charges>
- ²⁰ Tex. Bus. & Comm. Code Sec. 17.46(b)(33)
- ²¹ "Asset Forfeiture Laws by State." *FindLaw*, last updated February 26, 2019. <https://www.findlaw.com/criminal/criminal-rights/asset-forfeiture-laws-by-state.html>
- ²² Anne Teiger, Lucia Bragg. "Evolving Civil Asset Forfeiture Laws." *Legis Brief*, Vol. 26, No. 5, National Conference of State Legislatures, February 2018. <https://www.ncsl.org/research/civil-and-criminal-justice/evolving-civil-asset-forfeiture-laws.aspx>
- ²³ Ron Balaskovitz. "More than \$300k seized in massage parlor raids." *Amarillo Globe-News*, November 18, 2016. <https://www.amarillo.com/article/20161118/NEWS/311189882>
- ²⁴ Sara Jean Green. "Major prostitution bust: Seattle police raid 11 massage parlors, freeing 26 women." *Seattle Times*, March 7, 2019. <https://www.seattletimes.com/seattle-news/crime/a-crazy-amount-of-money-seattle-police-raid-prostitution-network-in-massage-parlors/>
- ²⁵ Pat Reavy. "Masseuse told undercover officer if he didn't want sex to go elsewhere, charges say." *Deseret News*, February 10, 2021. <https://www.deseret.com/utah/2021/2/10/22276938/masseuse-told-undercover-officer-if-he-didnt-want-sex-to-go-elsewhere-charges-say>
- ²⁶ Marc Freeman, Lisa Huriash. "Here's how cops got video cameras into massage parlor for sex sting." *South Florida Sun Sentinel*, March 11, 2019. <https://www.sun-sentinel.com/local/palm-beach/fl-ne-search-warrants-unsealed-day-spa-20190311-story.html>
- ²⁷ Press release. U.S. Immigration and Customs Enforcement, March 7, 2014. <https://www.ice.gov/news/releases/hsi-dallas-pd-serve-search-warrants-10-dallas-massage-parlors>
- ²⁸ Jim Green. "DA: Takedown of alleged prostitution and money laundering enterprise in Centereach." *On Town Media*, November 25, 2020. https://www.ontownmedia.com/beyond_sachem/da-takedown-of-alleged-prostitution-and-money-laundering-enterprise-in-centereach/article_76a8d264-2f6f-11eb-81aa-9b02771a4c4d.html
- ²⁹ "Sisters Sentenced to 10 Years in Prison Following Human Trafficking Investigation." Ohio Attorney General, October 16, 2016. <https://www.ohioattorneygeneral.gov/Media/News-Releases/October-2015/Sisters-Sentenced-to-10-Years-in-Prison-Following>
- ³⁰ Redacted version of Operation Bad Apple indictment. <https://www.denverda.org/wp-content/uploads/news-release/2020/082020-Bad-Apple-Indictment-Final-REDACTED.pdf>
- ³¹ DI-140 Memorandum Opinion. <https://news.delaware.gov/files/2019/11/DI-140-Memorandum-Opinion.pdf>
- ³² Press release. "Pensacola Man Pleads Guilty to Federal Charges Related to Human Trafficking in Multiple States." Department of Justice, November 14, 2019. <https://www.justice.gov/usao-ndfl/pr/pensacola-man-pleads-guilty-federal-charges-related-human-trafficking-multiple-states>
- ³³ Press release. "Federal Charges for Pensacola Man Related to Allegations of Human Trafficking in Multiple States." Department of Justice, August 16, 2019. <https://www.justice.gov/usao-ndfl/pr/federal-charges-pensacola-man-related-allegations-human-trafficking-multiple-states>

³⁴ Press release. “Thirty-Six Defendants Sentenced for Their Roles in International Thai Sex Trafficking Organization.” Department of Justice, June 10, 2021. <https://www.justice.gov/usao-mn/pr/thirty-six-defendants-sentenced-their-roles-international-thai-sex-trafficking>

³⁵ Gretchen Wenner. “T.O. bust brings down an alleged sex trafficking empire.” *VC Star*, September 18, 2019. <https://www.vcstar.com/story/news/local/communities/county/2019/09/18/ventura-county-sheriff-detectives-bust-human-trafficking-ring/2348327001/>