

# SACRAMENTO AGAINST SEX SLAVERY

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REPORT



Presented by Opening Doors, Inc.

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## ABSTRACT

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According to the County of Sacramento Internal Services Agency, there are over 158 massage establishments currently licensed within Sacramento County.<sup>1</sup> Neighbors surrounding some of these massage parlors have observed that they open up and close down quickly, change their names frequently, employ only female staff, and have only male patrons. These are characteristics commonly associated with prostitution; however, characteristics that are common to prostitution coincide with characteristics of commercial sex trafficking. Data compiled by Opening Doors, Inc. (ODI) suggests that, in our opinion, sex trafficking may be taking place behind the doors of local massage parlors.

As of January 2013 in Sacramento County, no regulatory agency or law enforcement agency is mandated to inspect massage establishments on a routine basis. In response to the lack of inspection and investigation by county or city officials, ODI and its partners have organized the “Sacramento Against Sex Slavery in Massage Parlors” Campaign (hereinafter referred to as SASS MP).

Through research, including interviews with affected local businesses, visits to massage parlors, examination of massage parlor review websites, dialogue with human trafficking service providers, and review of national massage parlor trafficking cases, ODI has collected data that suggests human trafficking could be a problem in Sacramento.

The line between prostitution and commercial sex trafficking is a fine one. Without law enforcement intervention followed by screening of the women working in the massage parlors, it is difficult to discern whether the women are working there voluntarily or by force, fraud, or coercion. While some anti-trafficking organizations have taken a stance on whether prostitution should be legal, the purpose of this report is not to focus on the prosecution of prostitution. The goal of ODI and SASS MP is to raise awareness of the growing issue of commercial sex trafficking and to encourage local officials, law enforcement, and regulatory agencies to organize and utilize existing resources to support routine regulatory inspection of all massage establishments to stop and prevent commercial sex trafficking.

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<sup>1</sup> Number provided to Opening Doors, Inc. by County of Sacramento Department of Finance.

## INTRODUCTION – HOW OPENING DOORS, INC. BECAME AWARE OF THE ISSUE OF MASSAGE PARLORS IN SACRAMENTO

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Opening Doors Inc. (ODI) is a nonprofit organization based in Sacramento. ODI's mission is to empower refugees, immigrants, human trafficking survivors, and underserved Sacramento area residents to achieve self-sufficiency by accessing opportunities to mainstream economic and social systems. Our Survivors of Human Trafficking Program has served over 70 victims by connecting them with social services, helping them apply for trafficking visas, assisting them in finding healthcare services, finding safe housing, enrolling them in English classes, and supporting them in rebuilding their lives. Through our work with victims and law enforcement, we have gained more insight into the dynamics of trafficking in Sacramento County and have become more aware of the prevalence of human trafficking in a variety of growing industries.

Inquiries by both Citrus Heights Police Department and the Healing Arts Institute were the driving force behind ODI's investigation into the massage parlor industry in Sacramento. In 2011, the Healing Arts Institute (HAI) contacted ODI with concerns about human trafficking within the massage industry. As a leading provider of training for massage certification in the Sacramento Region, HAI heard rumors of smaller massage schools illegally selling their transcripts to the public which in turn could be used to gain massage licenses for untrained individuals. Shortly thereafter, in the spring of 2012, ODI was contacted by the City of Citrus Heights Police Department, and during a subsequent meeting it was revealed that the police had strong evidence to suggest that sex trafficking was taking place in Citrus Heights massage parlors.

After being contacted by HAI and Citrus Heights Police Department, ODI began research into the regulation of massage parlors and what role it could play in helping to prevent sex trafficking in the massage parlors.

## WHAT IS HUMAN TRAFFICKING?

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### Federal Statute

The federal anti-trafficking statute is known as the Victims of Trafficking and Violence Protection Act (TVPA). The TVPA defines trafficking as (a) sex trafficking which is a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act is under 18; or (b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.<sup>2</sup> A victim need not be physically transported from one location to another in order for the crime to fall within the federal definition of trafficking. This definition is important in that it corrects the commonly held notion that human trafficking can only be conducted across international borders

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<sup>2</sup> TVPA § 103(8), 22 USC § 7102; 8 CFR § 214.11(a). *See also* "Fact Sheet: Human Trafficking." Office of Refugee Resettlement. <http://www.acf.hhs.gov/programs/orr/resource/fact-sheet-human-trafficking> (August 2, 2012)

or must involve a foreign national. The U.S. Department of State has stated that, “To define trafficking in persons on the basis of movement is to create an artificial and unfounded distinction between victims who are exploited without being moved and those who are moved prior to and during their exploitation.”<sup>3</sup>

Federal reports estimate that 14,500 to 17,500 victims are trafficked into the United States every year.<sup>4</sup> This number does not include the number of persons who are trafficked within the United States.<sup>5</sup> Trafficking occurs in various industries or markets, including brothels, massage parlors, street prostitution, hotel services, hospitality, agriculture, manufacturing, janitorial services, construction, health and elder care, and domestic service, among others.<sup>6</sup>

## State Statute

The state of California has defined human trafficking as “all acts involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons, within national or across international borders, through force, coercion, fraud or deception, to place persons in situations of slavery or slavery-like conditions, forced labor or services, such as forced prostitution or sexual services, domestic servitude, bonded sweatshop labor, or other debt bondage.”<sup>7</sup>

California is among the top states in the U.S. for incidents of known human trafficking. Between July 1, 2010 and June 30, 2012, California's task forces initiated 2,552 investigations, identified 1,277 victims of human trafficking, and arrested 1,798 individuals.<sup>8</sup>

## Sex Trafficking v. Prostitution

Sex trafficking comprises a substantial portion of human trafficking. Sex trafficking exists because of the demand for commercial sex around the world. In 2004, the U.S. estimated that 80% of victims trafficked across international borders are female and 70 percent of those females are trafficked for sexual exploitation.<sup>9</sup> It is also estimated that within the U.S., 50% of all trafficking is commercial sex trafficking.<sup>10</sup> The U.S. Department of State has stated that when an adult is coerced, forced, or deceived into prostitution – or maintained in prostitution through coercion – that person is a victim of trafficking.<sup>11</sup>

The U.S. Government took a strong position against prostitution in December 2002. The policy noted that “prostitution is inherently harmful and dehumanizing, and fuels trafficking in persons.

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<sup>3</sup> Trafficking in Persons Report 2007.” U.S. Department of State <http://www.state.gov/j/tip/rls/tiprpt/2007/index.htm>. (hereinafter referred to TIP Report 2007).

<sup>4</sup> “About Slavery: Slavery Map.” <https://www.freetheslaves.net/SSLPage.aspx?pid=375>

<sup>5</sup> “Human Trafficking in California.” State of California Department of Justice Office of the Attorney General <http://oag.ca.gov/human-trafficking/what-is> (2012).

<sup>6</sup> “Trafficking in Persons Report 2012.” U.S. Department of State <http://www.state.gov/j/tip/rls/tiprpt/2012>. (hereinafter referred to TIP Report 2012).

<sup>7</sup> California Penal Code §236.1

<sup>8</sup> Human Trafficking in California, *supra* note 5

<sup>9</sup> “Trafficking in Persons Report 2004.” U.S. Department of State, Fergus, Lara. “Trafficking in women for sexual exploitation.” Briefing: Australian Centre for the Study of Sexual Assault. (hereinafter referred to TIP Report 2004).

<sup>10</sup> Free the Slaves *supra* note 4

<sup>11</sup> TIP Report 2012 *supra* note 6

Turning people into dehumanized commodities creates an enabling environment for human trafficking.”<sup>12</sup> Among prostitution and trafficking theorists there is a general agreement that sex trafficking shares an intricate relationship with prostitution; however, the nature of that relationship remains a subject of controversy.<sup>13</sup>

## HUMAN TRAFFICKING IN MESSAGE PARLORS

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### Message Parlors v. Massage Establishments and Massage Therapists

Legitimate massage therapists or somatic practitioners are required by law to obtain certification from an accredited institution. Legitimate massage therapists often join professional associations such as the Associated Bodywork & Massage Professionals (ABMP). Associations such as the ABMP offer practice support, promote ethical standards, and are usually involved in legislative advocacy and public education amongst massage professionals.<sup>14</sup> These associations require and verify that therapists have graduated from an approved massage training program and achieved all state certification/licensing requirements and/or meet all of the organization’s eligibility requirements before allowing membership.<sup>15</sup>

Asian Massage Parlors tend to be the most visible massage parlor operations. According to a Polaris Project<sup>16</sup> publication on Asian Massage Parlors (AMPs), AMPs “operate as commercial-front brothels claiming to offer legitimate services such as massage, acupuncture, and other therapeutic, health, and spa services. AMPs are distinguishable from other legitimate massage businesses in that they provide commercial sex to customers, though massage and other non-sexual services may be available as well.”<sup>17</sup> Polaris Project states that, “AMPs conceal the commercial sex operation by registering and attempting to behave like legitimate businesses.”<sup>18</sup>

### Characteristics of Massage Parlors

Polaris Project lists common characteristics of AMPs to include:

- **Locations**: Strip malls, office buildings, sometimes residential homes.
- **Establishments**: Use of security cameras to screen and monitor clients; locked doors and use of buzzer systems to control entries of customers. Windows covered with bars, boards, or dark curtains.
- **Structure**: Extensive, sophisticated organized crime networks who act in concert with each other including business owners, brother keepers or “mamasans” who manage each individual location, informal Asian taxi drivers, recruiters, smugglers, and more.

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<sup>12</sup> “Trafficking in Persons Report 2008.” U.S. Department of State <http://www.state.gov/j/tip/rls/tiprpt/2008/105377.htm>. (hereinafter referred to TIP Report 2008).

<sup>13</sup> Farley, Melissa. “Theory Versus Reality: Commentary on Four Articles About Trafficking for Prostitution.” *Women’s Studies International Forum*. Vol. 32, No. 4, page 311-315 (2009).

<sup>14</sup> Associated Bodywork & Massage Professionals. <http://www.massagetherapy.com/find/index.php>

<sup>15</sup> *Id.*

<sup>16</sup> Polaris Project is one of the leading organizations in the global fight against human trafficking and modern-day slavery. <http://www.polarisproject.org/about-us/overview>

<sup>17</sup> “Asian Massage Parlors At-A-Glance.” Polaris Project. <http://www.polarisproject.org/resources/resources-by-topic/sex-trafficking>. (2011)

<sup>18</sup> *Id.*

- **Advertising:** Newspapers, magazines, billboards, phone and online directories and online community forums. This includes advertising on websites such as Craigslist and Backpage as well as sexually oriented websites and message boards.
- **Women:** Women typically live on-site where they are confined and coerced into providing commercial sex to 6-10 men a day, 7 days a week. Most often they are Asian women, both documented and undocumented.<sup>19</sup>

According to Polaris Project, the massage parlors are most often associated with Asian networks, but some massage parlors are also affiliated with domestic networks.<sup>20</sup>

In our opinion, our research findings and investigation of Sacramento parlors coincide with the findings of Polaris Project. ODI's research has also been affirmed by ongoing conversations with Sacramento Sheriff's Department and Sacramento City Officials.<sup>21</sup>

### When does the prostitution become trafficking?

According to Polaris Project, it is estimated there are more than 5,000 fake massage businesses nationwide.<sup>22</sup> Polaris Project states that fake massage businesses use force, fraud, and/or coercion to maintain control over the women and to cause them to believe that they have no other choice but to provide commercial sex.<sup>23</sup>

Polaris Project has identified common forms of control within massage parlors (quoted directly from their webpage):

**Force** – Isolation and confinement to the massage parlor; regular and frequent transportation to other locations or other cities by drivers working for the trafficking network; occasional physical or sexual abuse.

**Fraud** – False promises of a better life; false promises that a job in massage will be better than their current job; misrepresentation of the work, working conditions, and immigration benefits of the job; visa fraud.

**Coercion** – Victims often enter fake massage business networks with heavy debts which are increased through exorbitant fees for food, personal items, transportation, “security,” and interest – to pay off this debt, victims are pressured to “do whatever it takes to please the customer” to earn tips; exploitation of foreign nationals for labor within the massage parlor; unfamiliarity with the language, laws and customs of the U.S.; restrictions on communication to family or others outside the network; threats of deportation and arrest;

<sup>19</sup> *Id.*

<sup>20</sup> “Comparison Chart of Primary Sex Trafficking Networks in the U.S.” [Polaris Project. http://www.polarisproject.org/resources/resources-by-topic/sex-trafficking](http://www.polarisproject.org/resources/resources-by-topic/sex-trafficking). (2011).

<sup>21</sup> ODI representatives have discussed the issue of massage parlors with Detective Mike Write of the Vice unit of Sacramento County Sheriff's department on multiple occasions. ODI has also discussed the issue with Guy Fuson, Tax and License Manager for the County of Sacramento Department of Finance.

<sup>22</sup> When does it become trafficking?” Polaris Project. <http://www.polarisproject.org/human-trafficking/sex-trafficking-in-the-us/massage-parlors>.

<sup>23</sup> When does it become trafficking?” Polaris Project. <http://www.polarisproject.org/human-trafficking/sex-trafficking-in-the-us/massage-parlors>.



confiscation of passports and visas; culture of loyalty; exploitation of victims' shame; rumors of or witnessed violence at the hands of traffickers or police.<sup>24</sup>

ODI used the research performed by Polaris Project as a guide in reviewing massage parlors in the Sacramento area.

## **History of Massage Parlor Raids/Investigations in the U.S.**

Law enforcement investigations throughout the U.S. have found that sex trafficking exists within massage parlors. ODI researched these criminal cases and massage parlor code violation investigations in which sex trafficking was said to exist to gain insight as to what methods other cities have used to combat sex trafficking in massage parlors. To find if similarities exist between massage parlors in other cities and the ones located in Sacramento.

Below are a few of the notable investigations related to sex trafficking within massage parlors.

### *DALLAS, TEXAS (2005)*

From November 2004 through mid-August 2005, Mi Na Malcolm paid the smuggling debts of several Korean women who had been smuggled into the United States, or who had become indebted for their transportation into the United States, for prostitution. Then she forced the women to work at one of her three sexually-oriented businesses in Dallas, including the Ruby Spa, the Venetian Body Work and the Palm Tree Relaxation, to pay off their debt and for her own financial benefit.<sup>25</sup>

Malcolm housed a number of immigrants in the same massage parlors where they worked, monitored their movements in person or through an escort and via video surveillance. She required the women to work as prostitutes 6-7 days a week, but all the women were required to be available for prostitution 24 hours per day. Malcolm admitted to warning the women that they were not free to leave until they had paid their smuggling debts and the debts the women owed for food and rent.<sup>26</sup>

The arrest of Malcolm occurred on August 12, 2005, by officers from the Dallas Police Department and the Department of Homeland Security's Bureau of Immigration and Customs Enforcement (ICE). The federal and municipal law enforcement officers encountered "hundreds of thousands of dollars in cash, at least 117 tubes of surgical lubricant, [and] more than 6,000 condoms." They also found forty-two women.

On July 18, 2006, Malcolm was sentenced to ten years in prison and ordered to pay a fine of \$460,000. She pleaded guilty in March 2006 to "conspiracy to hold or harbor illegal aliens for

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<sup>24</sup> "When does it become trafficking?" Polaris Project. <http://www.polarisproject.org/human-trafficking/sex-trafficking-in-the-us/massage-parlors>.

<sup>25</sup> "Local Woman Pleads Guilty to Federal Charges of Harboring Korean Women to Work in her Sexually-Oriented Businesses." US Department of Justice Press Release. [http://www.justice.gov/usao/txn/PressRel06/malcolm\\_ple\\_pr.html](http://www.justice.gov/usao/txn/PressRel06/malcolm_ple_pr.html). (March 3, 2006)

<sup>26</sup> *Id.*

purposes of prostitution, harboring illegal aliens for commercial advantage and private financial gain, and bulk cash smuggling.”<sup>27</sup>

#### *OPERATION GILDED CAGE, SAN FRANCISCO (2005)*

Operation Gilded Cage in San Francisco was a federal investigation of alien harboring, interstate transportation for purposes of prostitution, interstate travel in aid of racketeering and money laundering, all related to individuals involved in the massage parlor industry.<sup>28</sup> A force of 400 federal and local law officers raided 11 suspected brothels and arrested 27 suspects in what was described as a major Bay Area sex trafficking operation that preyed on Korean women brought into the country illegally.<sup>29</sup>

Investigators found this to be an international sex trade ring operating an elaborate system that involved the YJY Travel and Tour agency and Yang’s Taxi Company. The travel agency would recruit young women from Asia and bring them to the U.S to work; then, the taxi company would transport the girls to and from work. The ringleaders, Young Joon Yang, Wu Sang Nah, and Sung Yong Kim shared girls within each of their networks. Over 120 women were discovered working as prostitutes in the massage parlors raided during the operation and a total of 27 suspected traffickers were arrested during the course of the operation.<sup>30</sup>

Massage parlors that were suspected of trafficking women in the San Francisco operation had many features in common: extensive locks and bars on the doors and windows of the establishment, a number of video cameras recording the activity within the parlor as well as outside the parlor, a common area once you walked into the parlor with a window and buzzer to enter the massage area, and hidden living quarters.<sup>31</sup> After the raids, investigations were conducted by the city’s Public Health Department in an effort to revoke their business permits and keep the massage parlors closed. The investigations by the Public Health Department uncovered that three of the massage parlors that had opened up for business again after the raid had double or twin-size beds rather than massage tables.<sup>32</sup> Inspectors also found that the parlors had secret back doors, trap doors and fake fire doors.<sup>33</sup> At the Empire Oriental Massage parlor, the supposed fire door led to a hallway that led back into the business, rather than outside, investigators said.<sup>34</sup>

Operation Gilded Cage revealed that even with such intensive investigations, it was difficult to obtain convictions for human trafficking. Anthony Gar Lau was the owner and operator of the

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<sup>27</sup> *Id.*

<sup>28</sup> Van Derbeken, Jaxon and Ryan Kim. “Alleged sex-trade ring broken up in Bay Area / Police say Koreans in massage parlors were smuggled in.” *San Francisco Chronicle*. <http://www.sfgate.com/bayarea/article/Alleged-sex-trade-ring-broken-up-in-Bay-Area-24979.php#ixzz2IGC9C6Jr> (July 2, 2005)

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> These details were revealed to Opening Doors, Inc. in a meeting with retired ICE agents who were part of the Operation Gilded Cage Investigation.

<sup>32</sup> Ginsburg, Marsha. “SAN FRANCISCO / Alleged code violations at 3 massage parlors.” *San Francisco Chronicle*. <http://www.sfgate.com/bayarea/article/SAN-FRANCISCO-Alleged-code-violations-at-3-2608789.php#ixzz2IGjAeaIx/> (September 15, 2005).

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

Golden Flower Steam and Sauna Spa in San Francisco.<sup>35</sup> Lau originally faced up to 20 years in prison for alien-harboring and conspiracy charges, and more than 100 additional counts of money laundering. However, due to the challenges of prosecuting the case, the U.S. attorney's office decided to drop all but one money laundering charge and asked the judge to choose a one-year prison sentence.<sup>36</sup> Under the plea agreement, Mr. Lau pleaded guilty to one count of money laundering and was sentenced to 1 year of prison.<sup>37</sup> He was also ordered by a U.S. District Court to forfeit his profits from the Golden Flower Steam and Sauna Spa -- \$1 million -- and to spend two years on supervised release after his prison term.<sup>38</sup>

Operation Gilded Cage also revealed that although some neighbors strongly suspected the massage parlors to be adult-oriented establishments, most were completely oblivious to the sex trafficking problem. Geoff (who ran a carpentry firm in the same building as one of the massage parlors raided during the operation) said, "I thought it was definitely an adult-oriented establishment." When interviewed, Carlos Lopez (who worked as a mechanic next door to one of the massage parlors investigated for human trafficking) said, "It looks like a normal business. I'm surprised something like this could happen next door. It's crazy."<sup>39</sup>

#### *OPERATION COLD COMFORT, EAST COAST (2006)*

In August 2006, federal agents raided a number of Korean human trafficking rings operating through the northeastern U.S.<sup>40</sup> Twenty-three Korean women in Washington and 44 in New York, Baltimore, New Haven, Conn., and Philadelphia were interviewed to determine whether they were involuntarily part of the ring that forced some women into prostitution to pay off tens of thousands of dollars in fees for being smuggled into the United States.<sup>41</sup> Thirty-one traffickers were arrested in a raid on five major massage parlors in Washington DC, Connecticut, New York, and Philadelphia.<sup>42</sup> Most of the women had their travel and identification documents confiscated by their traffickers.<sup>43</sup> Many had been promised hotel or salon jobs, but upon arrival, were forced into sexual slavery in massage parlors.

According to court documents, at the Downtown Spa in downtown Washington, the massage parlor operator told a middleman in New York that the workers "were tired because they served

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<sup>35</sup> May, Meridith. "Sex slave figure is sentenced." San Francisco Chronicle. Read more: <http://www.sfgate.com/bayarea/article/SAN-FRANCISCO-Sex-slave-figure-is-sentenced-2571473.php#ixzz2IGJ5yQGH>. (March 18, 2007).

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> MAY, MERIDEITH. "MASSAGE PARLOR OPERATOR GETS A YEAR, FORFEITS \$1 MILLION." SAN FRANCISCO CHRONICLE. <http://www.sfgate.com/bayarea/article/Massage-parlor-operator-gets-a-year-forfeits-1-2612431.php#ixzz2IGmtG3xT> (MARCH 7, 2007).

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<sup>39</sup> Alleged sex-trade ring broken up in Bay Area *Supra* note 24.

<sup>40</sup> Jang, Joon Oh, Kyungseok Choo, and Kyungshik Choi. "Human Trafficking and Smuggling of Korean Women for Sexual Exploitation to the United States: A Critical Analysis of Transnational Displacement and Anti Trafficking Measures." Korean Institute of Criminology. [http://www.e-alin.org/file/attach/upload\\_8594117170557910381.pdf](http://www.e-alin.org/file/attach/upload_8594117170557910381.pdf)

<sup>41</sup> Lengel, Allan. "31 Arrested in Reputed Korean Sex-Slave Trafficking Along East Coast." The Washington Post. <http://www.washingtonpost.com/wp-dyn/content/article/2006/08/16/AR2006081601513.html>. (August 17, 2006).

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

15 customers the previous night” and “she only had six girls working at the time, but needed eight girls because she would get up to 70 customers on a weekend.”<sup>44</sup>

#### *DALLAS, TEXAS (2007)*

Dallas police raided 8 Asian massage and spa establishments they believed to be operating as brothels. Twenty-seven women were detained and 19 were released, many of the girls were screened as potential human trafficking victims, and at least one victim was identified. Dallas police had received criticism for their mishandling of the previous raid in 2005 for deporting the sex workers without first screening them to determine if they were in fact victims of trafficking.<sup>45</sup>

#### *KANSAS CITY, MISSOURI (2009)*

The owner of Asian Touch Massage, Hongmei Madole, pleaded guilty in federal court to inducing persons to travel across state lines and national borders to engage in prostitution and illegal sexual services. He was sentenced to two years and nine months in federal prison and subject to deportation.<sup>46</sup>

Between November 2005 and May 2007, Madole coordinated the women’s traveling arrangements.<sup>47</sup> Madole also placed advertisements in a local publication where she stated that “full body massages, table showers, saunas, and the best Asian female staff available.” The female staff worked from 9 a.m. to 11 p.m., seven days a week and lived inside the massage parlor.<sup>48</sup> The massage parlors had interior cameras to monitor the workers.<sup>49</sup>

Madole had recently stopped working with Ling Xu, Zhong Yan Liu, and Cheng Tang to start her own businesses. All of these massage parlor owners were charged together as co-defendants. Xu, Liu, and Tang pleaded guilty to the same charges as Madole and also pleaded guilty to money laundering. Additionally Xu pleaded guilty to aggravated identity theft for using the passports and identification of the workers in order to make wire transfers.<sup>50</sup>

In a separate case resulting from the investigation of Madole and the others, Wei Li Pang was also arrested. From February 2007 to May 2007, Pang recruited females to travel to Kansas City to work as masseuses. Similar to Madole, Pang purchased flights for the women and transported them from the airport to the massage parlors. Pang also purchased supplies to be used in prostitution activities, including the saran wrap that was used instead of condoms in order to avoid law enforcement detection. As with Madole, the workers worked from 9 a.m. to 11 p.m., seven days a week, and lived inside the massage parlors. There were also some instances where

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<sup>44</sup> *Id.*

<sup>45</sup> Eiserer, Tanya. “8 spas raided in prostitution sting.” *The Dallas Morning News*. (April 18, 2007). (Accessed from <http://www.heal-online.org/spas.pdf>).

<sup>46</sup> “Massage Parlor Owner Sentenced for Forcing Prostitution Sentenced for Coercing Prostitution.” *Department of Justice Office of the United States Attorney Western District of Missouri*. <http://www.justice.gov/usao/mow/news2009/madole.sen.htm> (April 7, 2009).

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

Pang transported the women from inside the massage parlor to her residence at night. The massage parlors were installed with security cameras to monitor the workers.<sup>51</sup>

*NEW YORK, TEXAS, NORTH CAROLINA, PENNSYLVANIA (2010)*

The New York Asian Organized Crime Task Force uncovered a network of brothels operating as massage parlors across four states. Twenty massage parlors were shut down and twenty-two alleged traffickers were arrested for the trafficking of Korean women.<sup>52</sup>

The defendants were participants in a network of illegal sex trafficking that included brothel owners, managers, brokers, transporters, and advertisers. In addition, two of the defendants were charged with money laundering and two others were charged with conspiring to distribute cocaine.<sup>53</sup>

The FBI had been investigating a network of prostitution businesses in New York City's Korean community. The investigation, aided by confidential sources, undercover officers, and recordings, uncovered a network of brothels in New York, Texas, North Carolina, and Pennsylvania.

The brothel owners frequently paid delivery car drivers and others to identify and transport Korean prostitutes throughout the United States to New York and elsewhere for the purpose of illicit sexual activity. The investigation uncovered at least 20 brothels throughout the United States.

The U.S. Attorney of the Southern District of New York described the situation: "In many cases, the prostitution businesses formally purport to be legal enterprises, such as massage parlors or health spas, but in fact generate the vast majority of their revenue through illegal prostitution."

*LODI, CALIFORNIA (2012)*

In June 2012, local police participated in an effort to inspect and regulate massage parlors within Lodi city limits. The goal of the investigations was to update the police department's list of technicians and owners for each location and determine whether any municipal codes were being violated. Their findings uncovered multiple infractions and code violations, including dress code violations and unlicensed women providing massages. In total, nine massage parlors were inspected in Lodi and 22 violations were issued. In addition to the clothing violations, seven citations were issued to technicians who did not have their permits on them at the time of the inspection. Five citations were also issued to technicians living on the massage parlor premises. Inspectors also found numerous security cameras at every location investigated.<sup>54</sup>

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<sup>51</sup> *Id.*

<sup>52</sup> Debusman, Bernd. "Sex Trafficking Ring Across Four States Busted." [Reuters](http://www.reuters.com/article/2010/11/18/us-crime-newyork-traffickers-idUSTRE6AH5FA20101118). [www.reuters.com/article/2010/11/18/us-crime-newyork-traffickers-idUSTRE6AH5FA20101118](http://www.reuters.com/article/2010/11/18/us-crime-newyork-traffickers-idUSTRE6AH5FA20101118). (November 18, 2010).

<sup>53</sup> [Manhattan U.S. Attorney Charges 21 Members of a National Prostitution Trafficking Network](http://www.justice.gov/usao/nys/pressreleases/November10/operationseoulmatearrestspr.pdf). U.S. Department of Justice United States Attorney South District of New York. (November 17, 2010). <http://www.justice.gov/usao/nys/pressreleases/November10/operationseoulmatearrestspr.pdf>.

<sup>54</sup> Nelson, Katie. "Eight Lodi massage parlors cited in inspection." *Sentinel Newspaper [Lodi, C.A.]*, June 22, 2012. [http://www.lodinews.com/news/article\\_0cf873e2-9b9c-54f6-a446-277830b8b9d3.html](http://www.lodinews.com/news/article_0cf873e2-9b9c-54f6-a446-277830b8b9d3.html).

At the time of this report, there is no information regarding criminal prosecutions.

## REGULATION OF MASSAGE PARLORS IN THE SACRAMENTO AREA

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Based on what we learned of massage parlor raids across the U.S., ODI researched which laws were applicable to massage business in the Sacramento area. Our research revealed that there are many laws that adequately regulate massage establishments, but there is very little enforcement being carried out to ensure observance. Below are the regulations that apply to Sacramento area massage establishments.

### California Law Pertaining to Massage Therapists

Effective September 1st, 2009, the California Business and Professions Code §4600 established massage regulation for California Statewide Voluntary Massage Certification through the California Massage Therapy Council. This allows certified massage professionals to work in multiple California locations without the need for multiple permits and permit fees. This California law has also established criteria for the CAMTC Certified Massage Therapist (CMT) and CAMTC Certified Massage Practitioner (CMP) to exclusively use these professional titles. Massage therapists currently using “Certified” in their title can obtain certification through CAMTC and maintain that title, or maintain their local permit(s) and delete the term “Certified” in their professional title.<sup>55</sup>

In order to become a CMP, the practitioner must have 250 massage education hours of which more than 100 hours are in specified curriculum subjects, all at approved schools. To become a CMT, a practitioner must have at least 500 hours of massage education, of which at least 250 hours shall be from approved schools. The remaining 250 hours required may be secured from either approved schools or from continuing education. This certification must be renewed every two years.<sup>56</sup> Additionally, the CAMTC reminds massage practitioners that if they choose to open their own business, are self-employed, or are operating as an independent contractor, the practitioner is still required to obtain a business license as is required by most cities.<sup>57</sup>

According to CAMTC’s website, California Business and Professions Code §4612 limits what a city or county can require if all the massage professionals practicing at an establishment are certified by CAMTC. A city or county can require up-to-date proof or registration proving that all staff members providing massages are currently CAMTC certified. A city or county may also require a business license of the business owner, independent contractor or tenant.<sup>58</sup>

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<sup>55</sup> Frequently Asked Questions. California Massage Therapy Council. <https://www.camtc.org/Faq.aspx#>.

<sup>56</sup> CAMTC Certification Pathways. California Massage Therapy Council. <https://www.camtc.org/Pathways.aspx>

<sup>57</sup> Frequently Asked Questions *supra* note 51

<sup>58</sup> *Id.*



## SB 1193

On September 24, 2012, Governor Jerry Brown signed SB 1193.<sup>59</sup> SB 1193 requires specific business to post a notice informing the public and victims of human trafficking of telephone hotlines that will assist them in finding help or reporting unlawful activity. The bill requires that businesses, including massage businesses or establishments, post an 8.5 x 11 inch notice near their public entrance or at other conspicuous locations in a clear view of the public and employees. The poster must include a statement about forced labor and trafficking, two toll free hotline numbers to call for help, and information about the hotlines and services. The posters must be in English, Spanish, and any other language for which translation is required in the county for purposes of the federal Voting Rights Act.<sup>60</sup>

## Sacramento County

There are eight major government jurisdictions within Sacramento County: the unincorporated County of Sacramento, and the seven incorporated cities, each of which has its own license bureaus and regulations. The seven cities are: Sacramento, Folsom, Isleton, Galt, Citrus Heights, Elk Grove, and Rancho Cordova.

Sacramento County Code defines a massage establishment as “any place of business that offers massage, except for home occupations.”<sup>61</sup> It also distinguishes between a “massage practitioner” and a “massage establishment owner.” A “massage practitioner” is defined as “any person who for pecuniary compensation, consideration, hire or reward, engages in the practice of massage.”<sup>62</sup> A “massage establishment owner” is the one who operates, maintains, or permits a massage establishment and has an ownership interest in the establishment.<sup>63</sup>

All businesses within the unincorporated area must first apply with the Sacramento County Department of Finance for a “General Business License.”<sup>64</sup> Massage establishments are also required to obtain a “Special License” approved by the Sacramento County Sheriff.<sup>65</sup> The Special Business License is issued by the Sheriff.<sup>66</sup> The Sheriff’s Department conducts investigations of the backgrounds of the owners and persons managing or supervising the massage establishment and evaluates each application to determine whether the operation of the establishment would involve “unreasonable risk to the health, safety, or general welfare of the public.”<sup>67</sup>

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<sup>59</sup> “Gov. Jerry Brown signs bills targeting human trafficking.” *Los Angeles Times*.

<http://latimesblogs.latimes.com/california-politics/2012/09/gov-jerry-brown-signs-bills-targeting-human-trafficking.html>. (Sept. 24, 2012).

<sup>60</sup> “SB 11936 (Steinberg): Human Trafficking Hotline.” Accessed from CASTLA.org.

<http://www.castla.org/templates/files/sb1193-factsheet.pdf>

<sup>61</sup> Sacramento County Code §4.36.010(B)

<sup>62</sup> Sacramento County Code §4.36.010(D)

<sup>63</sup> Sacramento County Code §4.36.010(E)

<sup>64</sup> “Getting Down to Business: Your Guide to Business Regulations in the County of Sacramento.” Sacramento County Department of Finance <http://www.finance.saccounty.net/Tax/Documents/GettingDownToBusiness.pdf>. (2010 edition).

<sup>65</sup> Sacramento County Code §4.36.040

<sup>66</sup> Sacramento County Code §4.36.065

<sup>67</sup> Sacramento County Code §4.36.060. In conversations with Detective Mike Wright, Special Investigations Intelligence Bureau, at the Sacramento Sheriff’s Department, ODI learned that he is currently the only officer conducting these background searches.

Each massage establishment offering any services involving physical contact with patrons must be managed by a person who possesses a Special Business License.<sup>68</sup> No massage establishment offering massage services can operate unless managed by a person possessing a Special Business License.<sup>69</sup>

The Sacramento County Code also codifies operating regulations regarding hours of operation, lists of services, personal registers, attire and sanitation amongst others.<sup>70</sup> For example, massage establishments may not be open between 10:00 p.m. and 8:00 a.m.<sup>71</sup> Another example includes that all clothing of employees must be fully opaque, non-transparent material and should provide complete covering from mid-thigh to the collarbone.<sup>72</sup> Section K of §4.36.090 also states that no person may massage the genitals or anal area of any client.<sup>73</sup> Section L adds that no employee shall be in the room unless the genitals, gluteal crease or anus are fully covered.<sup>74</sup> Among the regulations, there are rules that specifically deal with common signs of trafficking including the prohibition of residence on the premises and prohibition against warning devices.<sup>75</sup>

Sacramento County requires at least two of these minimum qualifications for massage practitioners: (1) A copy of a diploma or certificate of completion from a nationally or regionally accredited or California State approved school of massage showing satisfactory completion of a program of at least one hundred twenty-five (125) hours of instruction in massage; (2) Evidence of satisfactory passage of the National Certification Exam for Therapeutic Massage or Bodywork; or (3) Evidence of membership in good standing in a national professional massage organization or association that provides continuing massage education that has specific requirements.<sup>76</sup>

It is important to note that the most recent update of the Sacramento County Code with regards to massage establishments occurred in 2005.

## **Sacramento Incorporated City Ordinances**

The cities of Sacramento, Elk Grove, Citrus Heights, and Rancho Cordova each have respective ordinances regulating massage establishments.

### *SACRAMENTO CITY ORDINANCE*

Sacramento provides regulation of massage establishments under two different categories: Adult Related Establishments and Somatic Practitioners.

Chapter 5.04, the chapter for adult-related establishments, of the Sacramento City Code defines a “massage technician” as “any person who for pecuniary compensation, consideration, hire or

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<sup>68</sup> Sacramento County Code §4.36.090

<sup>69</sup> Sacramento County Code §4.36.090.

<sup>70</sup> Sacramento County Code §4.36.090.

<sup>71</sup> Sacramento County Code §4.36.090(A).

<sup>72</sup> Sacramento County Code §4.36.090(F).

<sup>73</sup> Sacramento County Code §4.36.090 (K).

<sup>74</sup> Sacramento County Code §4.36.090 (L).

<sup>75</sup> Sacramento County Code §4.36.090 (M) and (N).

<sup>76</sup> Sacramento County Code §4.36.160.



reward, engages in the practice of massage as herein defined.”<sup>77</sup> Chapter 5.124, the chapter for somatic practitioners, defines a “somatic practitioner” as “an individual who for pecuniary compensation, consideration, hire or reward, engages in massage or bodywork and who qualifies to obtain a valid permit pursuant to this chapter.”<sup>78</sup>

A somatic practitioner must obtain a somatic practitioner permit in order to act as a somatic practitioner and also must obtain a separate somatic practitioner establishment permit.<sup>79</sup> To qualify as a somatic practitioner, a person must meet all of the following requirements: (1) possess a diploma or certificate from one or more recognized schools of massage or bodywork evidencing completion of a combined curriculum of no fewer than 120 hours of classroom instruction; (2) be a member in good standing of a state or national professional association devoted to the profession of massage and bodywork; and (3) completed during the previous calendar year no fewer than twelve (12) hours of continuing education in the practice of massage or bodywork.<sup>80</sup>

One provision of the Sacramento City Code states that a massage establishment shall not be required to obtain an adult-related establishment permit if all of the following are met: (1) Only massage technicians holding a somatic practitioner permit provide massage or bodywork services in the establishment; (2) No more than ten somatic practitioner permit holders are authorized to, and do, operate in the establishment; and (3) No person required to be licensed under the provisions of Chapter 5.04 (Adult Related Establishment) provides services in, or is employed at, the establishment.<sup>81</sup>

An application to be a “massage technician” is made through the chief of police.<sup>82</sup> In order to apply for the massage technician permit, the applicant and any operator of a massage establishment must have a diploma or certificate of graduation from a recognized school of massage. However, no such diploma or certificate must be provided for any applicant or operator who will not have physical contact with any customer or client.<sup>83</sup> The city manager can waive the above requirement if the applicant presents satisfactory evidence of attendance of at least 100 hours of instruction at a school within or outside this state or in any foreign country that provides education substantially equal to or in excess of the education requirements.<sup>84</sup>

The city also provides some regulation of massage establishment operations especially with regards to attire, specifically that all technicians shall wear garments that cover the entire body.<sup>85</sup>

A person does not have to get a massage therapist permit if (1) the individual holds a valid license to practice the healing arts under the laws of the state, or persons working on the business premises

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<sup>77</sup> Sacramento City Code 5.04.010

<sup>78</sup> Sacramento City Code 5.124.020

<sup>79</sup> Sacramento City Code 5.124.030

<sup>80</sup> Sacramento City Code 5.124.040

<sup>81</sup> Sacramento City Code 5.124.110

<sup>82</sup> Sacramento City Code 5.04.090

<sup>83</sup> Sacramento City Code 5.04.030(D).

<sup>84</sup> Sacramento City Code 5.04.150

<sup>85</sup> Sacramento City Code 5.04.240

of, and under the direct supervision of, a person holding a valid license to practice the healing arts under the laws of the state or (2) the individual holds a current, valid somatic practitioner permit.<sup>86</sup>

#### *ELK GROVE, CA CITY ORDINANCE*

In Elk Grove, the massage establishment code is under the “Adult Related Establishment” chapter. Elk Grove states that “massage technicians” must possess a diploma or certificate of graduation from a recognized school of massage.<sup>87</sup> Permits are issued by the chief of police and can be waived by the chief if he or she finds in writing that the applicant for the permit has attended not less than two hundred fifty (250) hours of instruction in massage at a school within or outside this State or in any foreign country that provides education substantially equal to or in excess of that received as a result of graduating from a recognized school of massage.<sup>88</sup>

#### *CITRUS HEIGHTS, CA CITY ORDINANCE*

Citrus Heights, like the other cities, requires that a massage establishment have a general business license<sup>89</sup> and that massage therapists have individual permits.<sup>90</sup> Citrus Heights’ minimum educational qualifications for massage therapists include: a diploma or certificate of graduation from a recognized massage school illustrating that the person has completed not less than 200 hours of instruction at a recognized massage school.<sup>91</sup> Citrus Heights has one of the more thorough city ordinances including restraints on advertisements and stricter operation guidelines.

The cities of Folsom, Isleton, and Galt have no existing ordinances relating to massage establishments.

### **Regulation and Inspection of Massage Establishments**

Sacramento County, and the cities of Sacramento, Elk Grove, and Citrus Heights, all have ordinances in place to regulate the massage industry effectively, but none identify a specific entity responsible for enforcing the ordinances. Citrus Heights even states that any representative of the city, including but not limited to members of the police department and any fire protection district of jurisdiction, may inspect a massage parlor and investigate the manner of the operation of the massage establishment to insure that it is operating in compliance with this article.<sup>92</sup>

Through conversations Sacramento County Sheriff’s Department, Citrus Heights Police, and the Sacramento County Department of Finance, ODI learned that there was currently no consistent inspection of any massage establishments in the Sacramento area.

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<sup>86</sup> Sacramento City Code 5.04.330

<sup>87</sup> Elk Grove City Code 4.30.105

<sup>88</sup> Elk Grove City Code 4.30.220.

<sup>89</sup> Citrus Heights Municipal Code Sec. 22-610

<sup>90</sup> Citrus Heights Municipal Code Sec. 22-613

<sup>91</sup> Citrus Heights Municipal Code Sec. 22-621

<sup>92</sup> Citrus Heights Municipal Code Sec. 22-688

## RESEARCH OF MESSAGE PARLORS IN SACRAMENTO

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### Online Research

ODI researched many message establishments within Sacramento County utilizing Rubmaps.com, Backpage.com, NaughtyReviews.com, and Eroticmp.com.<sup>93</sup> These websites host profiles of local message parlor businesses where consumers can comment and write reviews about their experiences including information about the sexual services they received and about the women who performed those services. Most of the websites require a membership fee to read the detailed accounts posted by the reviewers, although it is free to post or comment on the site. ODI paid for a one-month membership to Rubmaps.com in order to gain access to full reviews and also registered with NaughtyReviews.com in order to gain free access to full reviews for one month.

### *WEBSITE CONTENT*

In reading through all of the above listed websites, many of the reviews appeared to be written by men who frequent message establishments and seemed to be familiar with the services.

From the reviews we read, we noticed that it was typical for the reviewer to write about whether sexual services are offered or if it is a legitimate message establishment with no “extras.” Typical reviews discussed the various sexual services offered at the message parlor (i.e., manual stimulation, oral sex, and full intercourse), what they paid for the services, and ratings of how well the girls performed.

### *TYPICAL EXPERIENCE AT A MESSAGE PARLOR*

Based upon the reviews we read, ODI was able to gain some insight into what the typical experience would be for someone visiting a message parlor. For example, first, the woman who runs the business, typically referred to as the “mamasan,” greets the customer in the reception area. The customer pays the initial message fee up front. The normal fee is between \$40 and \$60. The customer is then led into a private room and told to undress and lay on the message table. The actual price for sexual services will either be negotiated as soon as the “masseuse” enters the room or once the message has started. Many reviews speak about the “flip,” the moment when the men are asked to flip onto their backs exposing their erections, as the time for negotiation. Prices and services are rarely spoken out loud but negotiated using pantomime and numbers on fingers. Once the price is agreed, the services are performed and the johns pay the “masseuse” in cash after they have finished.

Although the reviews themselves provided no overt signs of trafficking, in our opinion, based on ODI’s experience with trafficking we found a few indicators that are normally associated with signs of trafficking in message parlors. For example, the men would describe that a woman was “substituted” or “exchanged” at the message parlor for a “better one.” This indicator is a sign that women may be rotated between message parlors. Another reviewer stated that he got the impression the parlor “was a revolving door and some days the girls are just mechanical and overworked,” suggesting that the women are working excessively. One reviewer also asked

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<sup>93</sup> Rubmaps, NaughtyReviews, and EroticMP allow a website visitor to see profiles of message parlors in most states and major cities in the U.S. These are only a few of the websites offering similar profiles.

other massage parlor visitors to treat the masseuses well because “they are people and have feelings. A lot of them are illegal aliens and spend nearly their entire time in America (or where ever) in the parlor. They sleep there, eat there, and work there. You will get a much better experience if you are kind to them.” This would indicate that there is knowledge among the reviewers of the conditions that the women are working in.

#### *ONLINE RESEARCH FINDINGS*

As of July 5, 2012, Rubmaps.com had profiles of 98 massage parlors in Sacramento County, NaughtyReviews.com had 133 profiles, and Eroticmp.com had 68 profiles. Our online research led us to believe that at least 87 of these massage parlors are currently open for business. We based this belief on the fact that these 87 massage parlors had an online profile with these specific review sites updated within the last year, and/or had new customer reviews written in the past year. Forty-eight of these 87 massage parlors had 2 or more comments from reviewers suggesting or explicitly stating they had received sexual services within the last year.

### **Street Research and Street Outreach**

Because the online reviews gave little overt indication of trafficking, ODI decided to take a closer look at the massage parlors in order to determine if the female employees working at these establishments were actually victims of commercial sex trafficking or willingly engaged in prostitution. Because ODI does not have legal authority to inspect or investigate, our volunteers gathered what information they could to identify possible trafficking by visiting local massage parlors.

ODI volunteers entered five massage parlors and spoke with six female employees. Eleven other massage parlors were also visited; however, ODI volunteers did not enter the premises due to personal safety concerns and fear of putting employees in danger. In addition to the visits to the massage parlors, the volunteers interviewed more than ten employees and owners of neighboring businesses. During the visits, the volunteers took notes and recorded specific indicators signaling sex trafficking.

#### *HEIGHTENED SCRUTINY*

In the massage parlors visited, there was noticeably heightened security. This included extensive locks, barred windows (when other businesses in the neighborhood/strip mall did not have any), security cameras recording the exterior of the building (front and back), security cameras within the building itself, and sliding windows or bars across the front desk with buzzers to let people into the back area. At all of the establishments visited, the front windows to the business were blacked out with some sort of material (i.e., window tinting, curtains, butcher paper, etc.).

Heightened security was of particular concern at two of the massage parlors. Volunteers who entered these parlors observed extensive surveillance cameras and numerous locks/buzzers within the entrance/reception area. Both establishments were actively recording the foyer area with security cameras.

#### *RESPONSE OF EMPLOYEES WORKING IN MASSAGE PARLORS*

The reactions of the employees when the volunteers entered the massage establishments raised concern as to the existence of sex trafficking. In some cases, volunteers approached the

establishment as potential clients to ask about pricing and the types of massage services offered. In other cases, volunteers approached the establishment as service providers from ODI and spoke with the employees about human trafficking.

At two of the parlors, volunteers came into contact with employees who appeared hesitant in opening the sliding windows into the foyer. At both locations, the female employees indicated they did not speak English. At one business, the volunteers mentioned that ODI helps victims of trafficking and an employee began asking questions regarding the definition of human trafficking, revealing that her English was better than what she had first led the interns to believe. Once human trafficking was mentioned to the employees at the second business, one employee shook her head “no” and was quick to end the conversation while a second female employee covered her mouth with her hand and shyly ran into the back. It appeared that the women at the establishments visited felt awkward seeing two females (ODI volunteers) enter their places of business. In other establishments, the women who were running the reception area were very cold and curt with their responses to ODI intern questions.

#### *RESPONSE OF MASSAGE PARLOR NEIGHBORS*

Neighbors at two different massage parlor locations volunteered information that the female employees from the massage parlors were arriving together at the same time every morning, in the same vehicle. At one location a neighbor estimated that approximately eight to ten employees arrived together every day in the same van. At another location, neighbors said four female employees arrived together every day in gray SUV. It was unclear if the employees also left in the same vehicle because most neighboring businesses were closed by 5 or 6 p.m., while the massage parlors remained open. At one location, a neighbor mentioned that the employees seemed to change every few weeks. At other locations, neighbors appeared either somewhat unwilling or fearful to speak about the parlors, repeatedly stating, “I don’t know anything that goes on in there” or mentioning how bad the area had gotten since the arrival of the massage parlors.

The response from neighbors regarding the massage parlors in general was quite varied. While these responses are subjective, they do provide an on-the-ground assessment of community members who have a stake in maintaining a safe, crime free neighborhood, and indicate a problem worthy of follow up. In some cases, neighbors believed that the business was completely legitimate and that nothing more than massage was taking place. In other cases, the neighbors stated that it was “obvious” that the all-male clientele were getting more than just massages. At one location, the neighbors were absolutely positive that the male clientele were paying for sex and had gone into the massage parlor to investigate for themselves. In this specific case, the inquisitive neighbors were refused appointments for massage without reason and were not allowed to enter the back area of the parlor. None of the neighbors interviewed were familiar with sex trafficking or how to identify it.

#### *STREET RESEARCH FINDINGS*

Based on our experience and using the previously mentioned Polaris Project research<sup>94</sup>, we assessed that in our opinion, when three or more indicators (such as heightened security,

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<sup>94</sup> For reference, see above sections “Characteristics of Massage Parlors” and “When does prostitution become sex trafficking?”

surveillance, arrivals of employees in the same vehicle, etc.) occurred in one massage parlor, we suspected commercial sex trafficking. For example, we considered a massage parlor suspect for trafficking because of the heightened security, the neighbor's indication that the female employees were arriving in the same van, and the female massage employee who showed signs of fear when told about trafficking. At the second location, a combination of heightened security, information from neighbors who mentioned that the all-female staff seemed to rotate frequently and were transported to work every day, as well as the reaction of two female staff members demonstrating signs of fear, raised enough concern for ODI volunteers to suspect that in their opinion, sex trafficking occurred within this establishment.

Since the start of the campaign in July 2012, ODI volunteers spoke with local businesses surrounding 31 neighboring massage establishments. Based on our observations, the information gathered from the surrounding businesses, and our preliminary research, we believe that 22 massage parlors have indicators of commercial sex activity. Furthermore, we believe that 3 of these parlors show strong indicators of being involved in sex trafficking. The trends ODI volunteers noted included: women being dropped off together in vans early, women working very late hours into the night, high surveillance, and coded locked doors. There was also a trend of seeing frequent turnover of the female employees and massage parlor owners.

## CONCLUSIONS

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### Public Awareness

During its street outreach, ODI found that most people were unaware that sex trafficking could be happening locally in California and especially in Sacramento County. According to a report by Dr. Timothy C. Lim of CSU Los Angeles, California contains over 500 "erotic massage parlors," the highest number of any other state in the U.S. (Texas follows with 150 parlors). Assuming California is indeed such a popular hub for massage parlors engaged in illicit activities, and where prostitution exists trafficking follows, it is especially important for local citizens to be aware of this issue and to be proactive in putting a stop to it by asking law enforcement and county regulatory authorities to devote sufficient resources to regularly inspect for code violations and potential trafficking. The goal of the SASS MP campaign is to bring attention to the issue of human trafficking and the fact that it can exist within massage parlors.

### Recommendations from the California Alliance to Combat Trafficking and Slavery Task Force

As a service provider for victims of human trafficking, ODI understands the overwhelming need for outreach and education of the public and first responders about human trafficking in general, and the sex trafficking that may exist in Sacramento massage parlors in particular. The California Alliance to Combat Trafficking and Slavery Task Force published an updated report on human trafficking in California in 2012. The California Alliance to Combat Trafficking and Slavery recommends that law enforcement tailor prosecution operations to handle human trafficking cases to include human trafficking training, specialized expertise in human



trafficking, and leveraging external partnerships by working closely with victim service providers.<sup>95</sup>

### **ODI'S Recommendations**

Along with the recommendation of the California Alliance, ODI makes the following specific recommendations to Sacramento City Council and the Board of Supervisors.

- Sacramento County should mandate annual inspection of all massage establishments. These inspections should be carried out on an unannounced basis, and all inspectors should be accompanied by a social worker, service provider, or other professional who has been trained on the identification of human trafficking.
- The Sacramento County Sheriff's department should reinstitute "stings" against massage parlors suspected of human trafficking. We believe increased surprise regulatory inspections coupled with random "stings" will ensure that local ordinances are enforced and that traffickers are apprehended.
- Sacramento County should require that all law enforcement personnel attend trainings on how to identify cases of human trafficking.
- The Sacramento County Sheriff's Department and District Attorney should take the lead in enforcing the posting of human trafficking notices within all massage establishments in Sacramento County, in conformance with the posting requirements enacted with the passage of SB 1193.

With the support and cooperation of Sacramento County and City Officials, law enforcement, victim support organizations, and the community, implementation of the recommendations above will ensure that human trafficking is not allowed to flourish in Sacramento Massage Parlors.

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<sup>95</sup> "The State of Human Trafficking in California 2012." California Attorney General. <http://oag.ca.gov/human-trafficking/2012>

**Comparison Chart of Primary Sex Trafficking Networks in the U.S.**

	<b>Asian Networks</b>	<b>Latino Networks</b>	<b>Domestic Networks</b>
Locations of operation	Asian Massage Parlors (AMPs), room salons, hostess clubs, residential brothels, karaoke bars, escort services	Residential brothels, escort “delivery” services, hostess clubs/“cantinas,” and some massage parlors	Streets, hotels, residential brothels, strip clubs, some massage parlors, internet, truck stops, private parties
Trafficker profile	Older Asian female management in AMPs, male owners, enforcers, and transporters	Latino male controllers, recruiters, enforcers, transporters, pimps known as “padrotes” (father)	U.S. domestic male pimps, male/female recruiters and enforcers, male transporters
Victim profile	Predominantly South Korean women, some Chinese and Thai women, often between ages of 18 and 55; rare minors	Predominantly Mexican, central American and south American adult women, some minors	U.S. citizen adults and minors; some Native Americans; average age of recruitment estimated at 12-14
Demand profile (Johns) Open: All men Closed: Only some men	Middle to upper class working professionals; Asian men in ‘closed’ networks; some foreign business men	Entirely ‘closed’ network catering to Latino males	Open network that includes men of all backgrounds
Methods of recruitment	False promises of legitimate employment, internet chat rooms, in saunas/baths	False promise of marriage and opportunity; false promise of legitimate jobs	False promise of love and support; sometimes kidnapping or abduction
Methods of control	Physical isolation, language barriers, debt bondage, threats of reports to immigration, psychological control, intimidation, controlled transportation	Physical abuse, rape, assault with weapons, debt bondage, threats of force, threats to family, threats of reports to immigration, sexual abuse of minors	Physical abuse, rape, assault with weapons, debt bondage, threats of force, sexual abuse of minors, threats to family or to children, control of drug supply, psychological control
Affiliation to gangs	Some have affiliation with Asian street gangs and/or organized crime	Some have affiliations with MS-13 and other Latino gangs	Some have affiliations with street gangs; some gangs directly engage in trafficking
Advertising mechanisms to attract customers	Classified ads, Asian newspapers, internet classifieds, phone directories, word of mouth, billboards	Fake business cards distributed person-to-person, word of mouth	Online sex ads, internet classifieds, local newspapers, phone directories, word of mouth, text messaging
Pricing structure/Cost per sex act	\$60 per hour plus tips for AMPs; inflated prices for food and alcohol in room salons; average of 5 to 15 men per day	\$30 for 15 minute sex act; average of 20 to 35 men per day; money usually taken by managers and ‘padrotes’	Nightly quotas of \$200 to \$1,000; average of 7 to 15 men per day; all money kept by pimps/traffickers
Transnational and internal transportation structure	Smuggling through Canada and Mexico; overstaying legitimate visas; use of Korean “taxi” services	Smuggling through Mexico; transported via cargo vans or commercial buses between cities	Direct transportation by pimps; use of individual cars and/or commercial transportation lines
Support Structure that Facilitates Operations	Advertisers, landlords, active online John community	Advertisers, landlords	Advertisers, landlords, media, operators of hotels used heavily by pimps, taxis



## APPENDIX B: POLARIS PROJECT – ASIAN MASSAGE PARLORS AT-A-GLANCE

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### Asian Massage Parlors (AMPs) in the United States

*This document provides an overview of Asian brothels disguised as legitimate massage parlors in the United States. The document is intended to offer a basic understanding of the prevalence and nature of sex trafficking within this specific network, and it should not be viewed as exhaustive.*

#### **An Overview of Asian Massage Parlors**

Asian Massage Parlors or Korean Massage Parlors (AMPs or KMPs) operate as commercial-front brothels claiming to offer legitimate services such as massage, acupuncture, and other therapeutic, health, and spa services. AMPs are distinguishable from other legitimate massage businesses in that they provide commercial sex to customers, although massage and other non-sexual services may be provided as well.

Typically, AMPs conceal the commercial sex operation by registering and attempting to behave like legitimate businesses. Unlike other informal underground brothels, these brothels create a veil of legitimacy by interfacing with and operating within normal government and regulatory infrastructures. Common characteristics of AMPs that help them to appear like legitimate businesses include:

- Operating out of commercial spaces, such as strip malls, office buildings, or medical complexes
- Advertising in mainstream public venues, such as major newspapers and magazines, well-known online classified sites like Craigslist and Yellow Pages
- Paying rent to legitimate landlords and paying taxes to the government
- Offering a legal service, such as massage
- Displaying and utilizing items commonly used in therapeutic massage parlors, such as massage tables, saunas, and health-related posters
- Acquiring proper business occupancy permits and licensure – (*Note: this practice varies significantly depending on the specific massage parlor and state laws*).

#### **Defining Characteristics of Asian Massage Parlors**

**Location:** AMPs frequently operate in strip malls, office buildings, and residential homes, in urban, suburban, and rural areas in almost all 50 U.S. states.

**Establishment:** AMPs often utilize security cameras to screen and monitor clients as they enter the establishment. Many AMPs also have locked doors and use a buzzer system to control the entry of potential customers. Generally, customers cannot enter on their own and must be buzzed in by a “mamasan” or manager. It is common to see windows covered with bars, boards, or dark curtains.

**Structure:** AMPs operate as an extensive, sophisticated organized crime network with multiple controllers who act in concert with each other. The various actors within the network include:

- The behind-the-scenes business owners who set up and finance the parlors
- The Brothel Keeper (BK) or “mamasan” who manage each individual location
- “Kitchen ladies” who function as helpers to the “mamasan”
- “Secondary brothel keepers” who function as future “mamasans” in training
- Informal Asian “taxi drivers” who work for the network as transporters
- Recruiters
- Smugglers
- Attorneys who are paid by the network to represent any actor in the network in any legal matters

#### **Advertising Mechanisms**

As a seemingly legitimate registered business, AMPs often advertise openly in newspapers, magazines, billboards, phone and online directories, and on online community forums such as Craigslist.com and Backpage.com. They also

advertise on sexually-oriented websites and message boards including Eroticmp.com, Eros.com, and USAsexguide.info. Advertisements often cater to male customers, or “Johns.”

### **Pricing and Payment Structure**

Customers typically pay a “house fee” of \$60-90 USD which purchases a one hour session of commercial sex with one of the women. This “fee” is paid either in cash or credit card, and it frequently is paid in a manner that is distanced from a direct “sex for pay” arrangement. For example, after an hour long sex act, the customer may leave the “house fee” as cash on the table so it appears to be a voluntary “tip.” Customers are also encouraged to provide a separate cash tip to the woman in addition to the house fee, and unlike the house fee, this tip is optional. Victims receive very little or only a fraction of this money. In addition, although it is a seemingly legitimate registered business, the network does not pay any sort of wage or direct compensation to the women there. Voluntary “tips” left at the whim of the customers are the women’s only source of potential income.

### **Victims**

Women found in AMPs typically live on-site, 24 hours a day. The women are also rotated amongst brothels at a certain frequency (e.g., once every 2-3 weeks), and they stay indoors inside each parlor for practically the entire time while they are at a specific location. Business hours for these parlors are often 10am-2am, seven days a week. Therefore, women are often required to provide commercial sex in hour-long “sessions” to an average of 6-10 men per day, depending on the volume of customers. The victims are often Asian women of diverse ethnicities, including Korean, Thai, Chinese, and ethnically Korean-Chinese citizens. Victims may have come to the U.S. on valid visas, fraudulent visas, or may be undocumented and smuggled into the country. The number of women providing commercial sex at an individual AMP can vary from as few as one or two to as many as six or seven. Very rarely does this network include minors.

### **Clients**

Most AMPs can be described as an “open network,” meaning that generally men of any age or nationality can patronize the establishment. Typically, AMP clients are middle to upper class professional males. A massage parlor with all-male clientele is a strong indicator that commercial sex may be taking place.

### **Vulnerabilities and Means of Control**

Levels of control and exploitation differ among AMPs. It is also important to note that not every woman providing commercial sex within an AMP will meet the U.S. federal definition of “severe forms of trafficking in persons.” In general, AMPs control women through many means, including psychological abuse, threats, document confiscation, isolation, debt bondage, capitalizing on language barriers or the unfamiliarity of the women with their immediate surroundings. Physical abuse and violence may also be present, however relative to other sex trafficking networks, it is less frequently used as a method of control.

### **Fear of Law Enforcement and Other Authorities**

The women often do not leave the parlors unless they are being transported to other parlors or cities by designated taxi drivers, who also run their errands for them when necessary. The women do not independently control when taxis are called for them. Controllers also exploit knowledge disparities and the women’s naivety to actively create fear of the world outside the parlor. For example, “mamasans” may make up false stories about the outside world, such as telling the women that people will immediately recognize them as illegal immigrants or prostitutes, that there will be many police waiting outside, or that people in nearby buildings are watching them.

Similar to victims of other types of sex trafficking networks, these women are typically trained to tell canned stories to law enforcement, service providers, and others if they ever encounter anyone who is not part of the network or a John.

## **Debt**

Facing large debts and general financial need both play an important role in most women's entry into an AMP. Credit card debt, smuggling debt, family debt, or other forms of financial need such as daunting family medical bills leave the women vulnerable to recruiters, who appear to be offering legitimate jobs/helping the women pay down their debts.

Deployed in tandem with the control through debt, the network has purposefully designed a complex system of "fees" that the women must constantly pay. A "house fee" must be paid to stay at the parlor, in addition to a weekly "management fee." Additional fees are also charged to the women including exorbitant fees for food, personal items, pre-arranged transportation, and "security." The women are also charged high interest rates on their debt. Similar to a peonage or "company store" situation, the women are totally dependent on the network and also charged inflated fees to stay part of the network without any means of income except for discretionary tips from customers.

Mamasans may take on a woman's existing debt or keep her earnings in a bank account as a "favor" to her, thereby maintaining exclusive control of her finances. Because the women are paid only through tips from customers and not from any base wage, the relentless fees put economic pressure on each woman to provide commercial sex to customers in order to pay off their unending debt.

## **Immigration Status –**

Most of the women trafficked into massage parlors are not U.S. citizens, and many do not have legal status. Traffickers use the threat of deportation as well as document confiscation to maintain control of immigrant women. Without legal status, the women frequently fear and distrust police or government authorities. Controllers may also threaten to call the police or call immigration authorities if the woman doesn't "stay in line".

Controllers also use promises of various immigration benefits to recruit victims and maintain control. Visa fraud is prevalent and controllers may obtain fraudulent visas or other immigration documents for the victims, or they may abuse legitimate visas.

## **Isolation and Lack of Support Network –**

Immigrant women are vulnerable due to language barriers, unfamiliarity with their legal rights in the US, and/or lack of a local support network. Controllers frequently place restrictions on communication with family or others outside the network to further increase the women's isolation.

## **Misrepresentation of Work & Working Conditions –**

Victims are frequently recruited using false promises of a better job and a better life. They are often told that they will be providing massage, and many of the women in the network do not realize the extent to which they are expected to engage in commercial sex.

## **Trauma and Shame –**

For many victims, the trauma and shame surrounding their experiences facilitate their acceptance of the false beliefs fed to them by traffickers. Controllers also exploit a victim's sense of loyalty and indebtedness.

*\*The above list is not comprehensive or cumulative. One element of force, fraud, or coercion may be present, or many.*

## **Federal Laws Relevant to Asian Massage Parlors**

The defining feature in a sex trafficking network is the use of force, fraud, and/or coercion to maintain control over the victims and to create an environment in which victims believe they have no other choice than to provide commercial sex. The following federal laws are relevant to sex trafficking within AMPs.

**The Trafficking Victims Protection Act (TVPA)** of 2000 was the first comprehensive federal act to combat human trafficking in the US.

- Sextrafficking is defined by the TVPA as the recruitment, enticement, harboring, transportation, provision, or obtaining of a person - or benefitting financially or by receiving anything of value from participating in a venture that engages in the above acts - knowing that the means of force, fraud, or coercion will be used to cause the person to engage in commercial sex acts.”<sup>1</sup>

- Sextrafficking of minors does not require the use of force, fraud or coercion.

- As a result of the TVPA, sex trafficking was criminalized under USC §1591 with penalties as high as life imprisonment for the most severe cases.

▪ **The Mann Act of 1910** makes it a felony to knowingly transport a person in interstate or foreign commerce for prostitution or any sexual activity for which a person can be charged with a criminal offense, or to persuade, induce, entice or coerce any person to travel across state lines to engage in prostitution or other immoral purposes, or attempts to do so.<sup>2</sup>

▪ **The Racketeer Influenced and Corrupt Organizations Act (RICO Act)** <sup>3</sup>, passed in 1970, created new rules for admitting evidence of organized crime by creating a way to make a claim based on a “pattern,” defined as two occurrences of “racketeering activity,” which is defined as behavior that violates other specified laws, federal statutes or state laws.<sup>4</sup> The Trafficking Victim Protection Reauthorization Act (TVPRA) allows “trafficking in persons” to be included in the definition of a “racketeering activity.”<sup>5</sup>

▪ **U.S. Code 1328 titled “Importation of Alien for Immoral Purpose”**<sup>6</sup> reads, “The importation into the United States of any alien for the purpose of prostitution, or for any other immoral purpose, is forbidden. Whoever shall, directly or indirectly, import, or attempt to import into the United States, any alien for the purpose of prostitution or for any other immoral purpose...or shall keep, maintain, control, support, employ, or harbor in any house or other place, for the purpose of prostitution or for any other immoral purpose...should be fined until title 18, or imprisoned not more than 10 years, or both.”

### **State & Local Laws Pertaining to Asian Massage Parlors**

Typically, regulation of massage parlors is addressed at the local level and massage parlor laws and ordinances are written by the county, city, or town. State legislatures more often defer to regulations created by a state’s board of massage therapists, however there are some examples of massage parlor legislation at the state level. Below are examples of each:

**State Law:** The California law establishes a uniform standard certification and regulation process for all massage therapists, which applies to all cities and counties.<sup>7</sup> The law requires that massage therapists obtain training at an approved school, pass an exam and a background check, and provide ID and fingerprints.<sup>8</sup>

**Board Regulations:** According to Alabama law, anyone offering or advertising that they offer massage therapy services must be licensed and regulated by the Alabama Board of Massage Therapy, which creates its own regulations and has the authority to investigate potential violations.<sup>9</sup>

**Local Ordinance:** The Denver, Colorado Code of Ordinances requires massage therapists to apply for an identity card and prove that they are at least 18 years old. It also allows for the revocation of a license in the case of public indecency or prostitution.<sup>10</sup>

### **Relevant Statistics**

Online lists maintained by “Johns” that meticulously track AMPs estimate that there are over 4,000 brothels disguised as Asian massage parlors nationwide.<sup>11</sup>

### **Recent Massage Parlor Convictions**

Identifying sex trafficking cases in AMP networks can be particularly difficult. Massage parlors front as legitimate businesses in order to evade detection, and gathering enough evidence to prove that the traffickers used force, fraud, or coercion to compel victims into providing commercial sex is an added challenge. Victims’ movements and interaction with the outside are tightly controlled and there is little opportunity to reach out for

help. Victims do not often self-identify as a result of fear and distrust of law enforcement, shame, and unfamiliarity with their rights and the legal system.

■2010 (Massachusetts and New York): Five people in Boston and New York were indicted in April 2010 for operating a sex trafficking ring over the course of 2005 to 2010. The defendants lured women with fraudulent job advertisements in Chinese-language newspapers in New York, Boston and Los Angeles, and placed them in brothels in at least 11 towns in the Boston area. The victims were advertised in a local newspaper and on Craigslist, in an ad offering the “ultimate massage.”<sup>12</sup>

■2010 (California): Police in Fresno, California raided a massage parlor in January, 2010, finding evidence that several Chinese immigrant women may have been forced into providing commercial sex there. Police believe that the women arrived in Los Angeles from China, and were moved weekly to different parlors throughout the state. The business owner and one worker were arrested.<sup>13</sup>

■2008: U.S.v.Chong,etal. (New York): Len Wah Chong was sentenced to six years in federal prison and ordered to pay \$350,000 for her role in owning and operating a network of massage parlors in New York where commercial sex occurred. According to U.S. Attorney Terrance P. Flynn, the women lived in substandard conditions in the massage parlors and were not free to come and go. Flynn also stated that the women faced emotional abuse and other coercion. The women also had debts, and Chong utilized a few scheme to keep the women in the parlors. Chong and three members of her family were accused of operating the business, which included recruiting women to work in the massage parlors.<sup>14</sup>

■2006, U.S.v.Kim,etal. (New York): In August 2006, 18 search warrants and 31 arrest warrants were executed at brothels disguised as massage parlors throughout the northeast United States. Federal and local law enforcement investigated a criminal organization that trafficked women from South Korea for commercial sex in the massage parlors. The women had to pay large debts to the recruiters and other controllers involved in the enterprise. The controllers took the women's identification and travel documents, and threatened the women and their families if they attempted to leave before paying their debts. Eleven defendants were charged with conspiracy to commit human smuggling, human trafficking, and Mann Act violations and all pled guilty. Four defendants were sentenced to prison terms of seven months (time served), 15 months, 27 months and 41 months, with the latter defendant also ordered to forfeit \$200,000.<sup>15</sup>

Polaris Project works to empower and mobilize people from diverse backgrounds and of all ages to take meaningful action against human trafficking. Register with [www.polarisproject.org/signup](http://www.polarisproject.org/signup) to receive regular updates on human trafficking in the United States.

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<sup>1</sup> 22 U.S.C. § 1591.

<sup>2</sup> 18 U.S.C. §§ 2421 - 2428.

<sup>3</sup> 18 U.S.C. §§ 1961 - 1968.

<sup>4</sup> Kathleen Kim and Daniel Werner, CivilLitigationOnBehalfofVictimsofHumanTrafficking, 3rd ed. (Southern Poverty Law Center, 2008), 44-45, [http://library.ils.edu/atlast/HumanTraffickingManual\\_web.pdf](http://library.ils.edu/atlast/HumanTraffickingManual_web.pdf) (accessed November 8, 2010).

<sup>5</sup> Ibid.

<sup>6</sup> 8 U.S.C. § 1328

<sup>7</sup> Business and Professions Code, SB 294, California Statutes. (September 30, 2010): Section 19.1, <http://www.leginfo.ca.gov/statute.html> (accessed November 8, 2010).

<sup>8</sup> Business and Professions Code, Division 2, SB 731, California Statutes. (September 27, 2008): Section 2, <http://www.leginfo.ca.gov/statute.html> (accessed November 8, 2010).

<sup>9</sup> “Licensure Requirements,” Alabama Board of Massage Therapy, <http://www.almtbd.state.al.us/> (accessed November 8, 2010).

<sup>10</sup> Title II Revised Municipal Code, Chapter 33.5- Massage, Denver, Colorado Code of Ordinances: Article III-Massage Parlors, <http://library.municode.com/index.aspx?clientId=10257&stateId=6&stateName=Colorado> (accessed November 8, 2010).

<sup>11</sup> [www.eroticmp.com](http://www.eroticmp.com)

<sup>12</sup> John Kelly, “Feds: Greater Boston Sex Ring Included Quincy Brothel,” PatriotLedger(Quincy), April 1, 2010. <http://www.patriotledger.com/homepage/breaking/x905412914/Quincy-residents-among-five-indicted-in-prostitution-ring> (accessed November 8, 2010).



<sup>13</sup> “Police Investigate Sex Trafficking Allegations,” *KFSN-TV(Fresno)*, January 30, 2010. <http://abclocal.go.com/kfsn/story?section=news/local&id=7247384> (accessed November 8, 2010).

<sup>14</sup> Dan Herbeck. “Massage Parlor Owner’s Prostitution Role Nets Prison. *Buffalonews.com* (Buffalo). November 20, 2008. <http://www.buffalonews.com/incoming/article128355.ece> (accessed April 9, 2011).

<sup>15</sup> U.S. Department of Justice, Attorney General’s Annual Report to Congress on U.S. Government Activities to Combat Trafficking in Persons Fiscal Year 2006 (Washington, DC, 2007): 43. <http://www.justice.gov/archive/ag/annualreports/tr2006/agreporhumantrafficking2006.pdf> (accessed April 9, 2011)



### (As of July 2012)

Rubmaps.com has profiles of 98 Massage Parlors located in Sacramento County:

Sacramento: 48

Carmichael: 4

North Highlands: 4

Fair Oaks: 6

Rancho Cordova: 2

Elk Grove: 1

Citrus Heights: 19

Orangevale: 3

Folsom: 5

Naughtyreviews.com has profiles of 133 massage parlors in Sacramento

Eroticmp.com has profiles of 68 massage parlors in Sacramento

Research by ODI has verified that there are at least 87 massage parlors in Sacramento County. These establishments have had profiles and reviews posted within the last year on one or more of the 3 websites mentioned above.

Research has identified that 48 of these massage parlors are suspect. They have had reviews written by Johns online that mention some form of commercial sex (hand jobs, blow jobs, intercourse).

55% of the massage parlors in the Sacramento area have been identified as suspect.

Most of the reviewers have used the following abbreviations in their reviews. This is a list of the most common abbreviations we found:

HE= Happy Ending, this refers to oral sex, or hand jobs performed by the "masseuse"

BJ= Blow Job or oral sex.

BBBJ = bare back blow job = BJ without condom

HJ= Hand Job or manual stimulation

FS= Full Service, which means intercourse is available

YYMV = "Your Mileage May Vary." Reviewers write this when they think you have to work up a relationship to be able to get sexual services

CG = "Cow Girl," the name of a sexual position.

DS or K9 = "Doggy Style," the name of a sexual position

## APPENDIX D: SAMPLES OF MESSAGE PARLOR REVIEWS

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ODI went through several massage parlor reviews to assess whether there would be indicators of trafficking. Below are a few of the reviews that in our opinion showed signs of trafficking.

### **From NaughtyReviews.com – Comment left on March 10, 2012**

I come in, ring the bell, and am greeted by mamasan after she undoes all of the locks on the other side of the door leading to the massage rooms. Place seems secure. I tell her I want an hour as she leads me to the room. As she takes the fee, she pokes her head back in and jokingly whispers to me "Hope you have money left for girl", and of course she could see in my wallet so she knew damn well I did. She asks if I want a shower, I tell her yes. As I'm disrobing, my masseuse walks in - hands down the best looking girl I've had the pleasure of getting pleased by. She was just my type - a little older than me, great full rack, sweet ass, long brown hair, plump lips, pretty face and all wrapped up in a cute little red dress that came down just past her ass. She points me to the shower and I shower up. I return and she enters shortly asking if it's my first time, I lie so there's no question about my odds of FS, I just tell her it's been a bit since my last visit. She asks the name of the last girl & I just lie and say I didn't ask, but I never ask their names. as i'm leaving the shower i catch plain view of the monitor with all the security cameras on it, confirming my speculation about this place being secure. She asks if I want oil or lotion and I go with oil. She makes small talk with me, general stuff like my age and what I do, etc. She asks if I want hard or soft and of course I say hard. The massaging was light and minimal as she casually sat on the table. I'm draped in the smallest of towels they provided and as she sits, that fine ass pulls the towel off of me and she plays coy puling it back on a bit. she lazily works her way down to my lower legs. I move my arm up to feel her soft calves and as i look in the mirror directly in front of the head of the table (with no head/face hole) and see the full length mirror, giving me the best view of this fine specimen bent over, ass peeking out of her dress. As I move my hand up for more fun, the mood shifts and we both know it's time for negotiation. She tells me to flip and of course can't help but notice my raging wood and comments on it asking "What can I do for you?" I ask the services and price, she does the mime for HJ for \$60, mimes BJ for \$100. I ask if they do more and she mimes a pelvic thrust for \$160 and of course I say yes. She snatches the towel off of me and she's game. As I get up to get the cash, I turn around and she's peeling herself out of the tiny dress showing me the goods and I am pleased. I realize i only have \$140 and think it's a deal breaker as she says "Maybe next time" I hand her just \$100 and she comments about only getting handed \$100, SCORE! getting service on a bit of a discount, she was still raring to go. I lay on the table while she leaves to deal with mamasan. Comes back in shortly with the Hat and disrobes again. Light playful massage starts and she pops the Hat on me as she starts the brief CBJ. She lays down & we go to town, then eventually switch to doggy. When she initially peeled out of her thong I ask about going down and she politely declined. She was wet and tight. I think she may have been a bit of a clock watcher because the end felt rushed but I was satisfied nonetheless. When I get dressed she asks about how often I need these kinds of services, no doubt subtly inquiring about when I may be able to get her that other \$20 she missed out on. I intend to return for sure and tell her how great she was. She hugs me, leads me out and offers me a bottle of water as I exit. Perfect cap to a great session. Hit her up guys.

### **From Naughtyreviews.com – Comment left on June 9, 2012**

I've been here several times and it has been sketch. Great providers and fine too but the spot is out in the open in a strip mall (very obvious) and always many crackheads lingering.

I tried to park a couple weeks ago nearby when I saw 3 crack fiends lurking in front of the entrance so I circled around the building to get a moment to enter when I saw 2 LE cars posting in the rear. Maybe a sting OP so be careful. This place is hot and they have gotten in trouble a couple times since I've heard.

As far as the service goes I always get a really hot chick named Jessica who has a great natural body. Massage is weak but the FS is why we go, isn't it. Haha enjoy but take caution.



### **From Naughtyreviews.com – Comment Left of June 6, 2012**

I was a walk-in on a Friday before 10 AM opening. I had been here a few years back and thought I'd check the "under new management" situation. It was definitely different. Formerly was a Russian massage with desks in the front room. Now an Asian style massage where **you ring the bell to get beyond the foyer once inside the front door.** Remodel was done clean and proper. It was upscale before, and remained moderately upscale, very clean, completely private rooms. Didn't check out table shower.

Cheerful older Asian lady welcomed me and asked if it was my first time. I said yes. I paid \$40 or \$50 (I forget, sorry) 1/2 hour house charge. Laura, a thin hot Filipino, promptly came in and began massage. She was wearing tight miniskirt and was flirtatious from the beginning. On face down she removed towel early and asked about my Speedo tan lines.

When she turned me over she noticed my obvious erection, and I offered her \$100 for FS, which she excitedly accepted. She prepared and returned, stripped down from sun dress with bra and thong underneath, let me suck her firm natural tits and began the erotic massage. She very gently dressed my cock and then gave me a very sexy "less is more" (my favorite) gentle CBJ. Normally, I hold out for the FS, but she was so sexy I couldn't help myself and blew my load. There was time left over for her to finish the 30 minutes with good legitimate massage.

Laura was a great provider, excellent attitude throughout and seemed to genuinely enjoy the whole process. Next time I will pay the slight bit more for one hour, because legitimate massage was high quality as well. As I was leaving noticed another hot girl in the hallway. She looked like half-Asian, half-Caucasian which I thought was very hot looking. I'm going back soon.

### **From Naughtyreviews.com – Comment left on January 12, 2013**

No appointments; I tried to call but never answered. When I asked, she said walk-in only, no appointments. My second visit and my experiences do not match the reviews. The lady who opened the door was a bit older and heavier and had no personality. **I expected certain girls from the reviews, but none were there. In fact, I expected to see multiple girls and was told she is the only one working today.**

I asked for YoYo, and she told me YoYo was no longer working there and expressed negative comments toward YoYo. I then asked for Star, but she had no clue who that was. She told me the girls always leave, and she has only been there a month. She took my money for the 1/2 hour and stepped out for a minute, then came back and waited, while I finished undressing.

I found this interesting and promising that she stood by while I disrobed. She asked me to lay face down, never covered me and began by standing at the head of the table and rubbing from my shoulders to my hips. Within 2 minutes, she asked, "Can I have you today?" Wow! I had to asked her to repeat it. She then asked if I wanted it all, so I asked how much. We negotiated a tip, which seemed okay, since she said "Everything."

After taking the money, she went right to business. She stripped, and although a bit chubby, had nice big tits and big nipples. She laid me back on the table, gave a 1-minute HJ, then put a cover using her mouth for a 1-minute BJ. Then she stood up, slapped on some lube, laid back on the table sideways with her legs up, so I had to stand while pumping her, and she said "Okay, go."