

# DISRUPTING ILLICIT MASSAGE BUSINESSES AND HUMAN TRAFFICKING IN OHIO

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Graphic Design: Claire Pawlecki

# EXECUTIVE SUMMARY

Illicit massage businesses (IMBs) are a multi-billion dollar criminal enterprise that takes place in all fifty US states. It is estimated that there are currently over 10,000 IMBs in the US and approximately 300 in Ohio. They are the number one venue for sex trafficking reported to the National Human Trafficking Hotline. IMBs, also known as “erotic massage parlors,” are spas and massage businesses that exploit victim-workers and facilitate commercial sexual activities. Most victims are Chinese or South Korean women who are manipulated via deception, fear, cultural norms, and high levels of fraudulent debt. Victims are subjected to both forced labor and sex trafficking at IMBs. Current state law in Ohio leaves a “regulation void” for non-medical, non-therapeutic, or relaxation massage. This lack of regulation is exploited by criminal actors to establish IMBs. Also, municipal ordinances often lack adequate regulation of massage/spa businesses and local law enforcement lack the training and expertise to effectively respond. In addition, many ordinances stigmatize the profession of massage therapy by using sexualized language and categorizing all massage businesses as sexually-oriented or adult entertainment establishments. This perpetuates expectations for commercial sex activities at spas and creates a hostile work environment for workers at both illicit and legitimate massage businesses.

Individuals and organizations seeking to create positive change should focus on reducing the demand for commercial sex within IMBs, advocate with government officials and representatives on improving laws and ordinances, and work to reduce the risk of exploitation by improving access to culturally sensitive, linguistically appropriate and trauma-informed awareness materials and services for victims, survivors, and at-risk populations. The impact of the COVID-19 pandemic has exacerbated vulnerabilities and enabled traffickers. It is up to the anti-trafficking community to adapt with this illicit industry and discover new and innovative mechanisms to take on these networks of IMBs at the source. Our hope is that this report will offer insight into such mechanisms.



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# INTRODUCTION

Illicit massage businesses (IMBs), more commonly known as “erotic massage parlors,” often act as fronts for human trafficking across the US. A report by Polaris (2018), a non-profit organization that combats human trafficking, estimated that there are over 9,000 illicit massage businesses in the US garnering about \$2.5 billion in revenue each year. Using a detailed analysis of IMBs in Houston, Texas, Bouche’ and Crotty (2017) estimated that the average IMB has 12 customers per day at \$106 per transaction. They then applied these numbers to the entire country to generate an estimate of \$2.8 Billion annual gross revenue for IMBs across the US.

More recently, Heyrick Research reported that the Illicit Massage Industry “is one of the largest—and most networked—sex trafficking markets in the United States” with over 10,000 IMBs across all 50 states (Figure 1). Using a rough calculation, they calculated

an even higher national revenue estimate of over \$3.8 billion (2020).

In this report, we provide an overview of IMBs with a focus on Ohio. Ohio is unique in the US in that massage therapy is licensed and regulated by the state medical board, but non-medical, non-therapeutic, or “relaxation” massage operates with nearly zero oversight or regulation. This loophole in the law has contributed to the spread of IMBs that exploit primarily foreign workers for commercial sex and forced labor. We present the scope and scale of the issue, discuss intersectional causes and impacts, and provide a detailed examination of both state and municipal policies. The report concludes with an outline for taking action for community activists and a set of detailed policy recommendations for municipalities to reduce the amount of sex and labor exploitation and the number of IMBs in their regions.

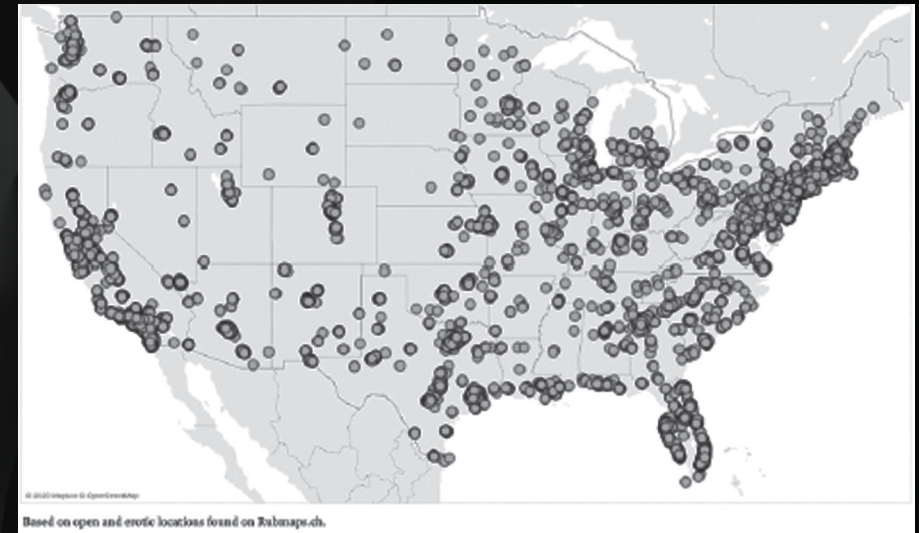


Figure 1. Source: Heyrick Research (2020) “Human Trafficking in the United States: The Illicit Massage Industry”

The report is based on research conducted by the Human Rights Center that builds upon recent studies of IMBs conducted by Polaris (2018), Heyrick Research (2020), and others. It includes content analysis and coding of municipal ordinances from 28 different Ohio cities, an examination of Ohio-based IMB advertising and reviews from commercial sex web sites, quantitative analysis of four decades of Ohio media reports accessed from Lexis-Nexis, and formal interviews conducted with seven experts with IMB-related experience in Ohio (including: law enforcement personnel, researchers, advocates, and massage therapists).

**“WHILE THE CRIMINAL SIDE OF THIS BUSINESS IS PROBLEMATIC, ULTIMATELY THE PROBLEM OF IMBS IS ONE OF PUBLIC HEALTH AND HUMAN RIGHTS.”  
(BOUCHE’ & CROTTY)**

## Illicit Massage Businesses as a Human Rights Violation

The exploitation that occurs within IMBs violates multiple human rights simultaneously as a direct consequence of forced labor and sex trafficking (Heyrick Research, 2019a). Using human rights as a framework to understand the exploitation and abuse that occurs in IMBs has several advantages. First, it brings a robust set of legal tools to bear on the problem: there are clearly defined violations by perpetrators and governments are legally obligated to protect human rights. Next, the focus on protecting the rights of individuals helps minimize intended and unintended harms against victims and provides for a more holistic set of services and remedies. Third, human rights can broaden the perspectives of government officials, law enforcement, and advocates to include the international context for trafficking and the structural causes of the violations.

Women and immigrants are two groups that are especially vulnerable to rights violations in the US. IMBs specifically target migrant women, primarily from China and South Korea, profiting from their vulnerabilities as racial and ethnic minorities (Polaris 2018). Not only are these women exposed to danger due to their gender and ethnicity, but their immigration status often exacerbates their risk of exploitation. The combination of commercial sexual exploitation and forced labor that occurs at illicit massage establishments creates an environment that strips thousands of individuals of their human rights.

Human rights are universal, meaning that the protections and obligations outlined are legitimate irrespective of political, state, or international boundaries and they exist for every person regardless of their age, sex, race, language, religion, national origin. The international human rights framework consists of aspirational and legally binding norms which are applicable in the US. In the context of IMBs, these norms include that no person should be held in slavery or servitude, including forced or compulsory labor (Universal Declaration of Human Rights (UDHR), Article 4; International Covenant on Civil and Political Rights (ICCPR), Article 8), no person shall be imprisoned based on an inability to perform a contractual obligation (ICCPR, Article 11), and everyone has the right to work, free choice of employment, just and favorable work conditions, protection against unemployment, equal pay and equal work, and just and favorable remuneration

without distinction to race, color, or national or ethnic origin (Convention on the Elimination of All Forms of Racial Discrimination (CERD), Article 5).

#### **Racism, Human Trafficking, and Illicit Massage Businesses**

Race and racism play a role in human trafficking broadly and in relation to IMBs specifically. Race intersects with class, gender, legal status, and other characteristics of victims. Human traffickers target and exploit the vulnerabilities of potential victims; such as poverty, prior victimization, trauma, substance use disorder, and homelessness. Human trafficking can happen to anyone; however, it is more likely to occur within groups who are already experiencing other deprivations (e.g., poverty). People of color in the US are more likely to live in poverty. The poverty rate among Black Americans is over twice the rate among whites, while the poverty rate among Hispanics is over one-and-a-half times the rate among whites (US Census, 2019). Employment patterns also present racial disparities in the US. White men and women both have lower unemployment rates than men and women of all other races (BLS 2020).

The impact of systemic racism extends beyond economic discrimination to other social and cultural barriers. "Attitudes and stereotypes about Black people (particularly women and girls) make it so that they are more vulnerable to sex trafficking but less likely to be identified or seen as victims" (Polaris, 2020)

***“ON ITS OWN, HUMAN TRAFFICKING IS AN ENORMOUS VIOLATION OF BASIC FREEDOM AND DIGNITY. BUT WHEN INTERSECTED WITH CENTURIES OF RACIAL TRAUMA AND DISCRIMINATION, THE RESULT IS AN UNFATHOMABLE ATROCITY ON THE MIND, SOUL, AND BODY OF EACH MARGINALIZED VICTIM. SO JUST AS RACISM PLAYS AN ACTIVE ROLE IN HUMAN TRAFFICKING, RACIAL JUSTICE ALSO NEEDS TO INFORM HOW THIS EXPLOITATION IS COMBATED AND HOW VICTIMS ARE EMPOWERED TO HEAL.”***

***BROOK PARKER BELLO,  
PHD, SURVIVOR***

The exploitation of vulnerability based on class and race is also evident in IMBs. Several studies (Polaris, 2018; Heyrick Research, 2020) have shown that victim-workers in IMBs are predominantly Asian migrants (Chinese, South Korean, Thai, and Filipino). Most of these women suffer from poverty and many come from rural communities. Lack of education and job skills and mandatory retirement age in China (50 years old for blue collar female workers) leads many older women to

seek opportunities abroad. They often accrue large, fraudulent debts as part of their migration to the US. Once here, racial discrimination, lack of social or professional networks, and lack of language skills limits job choices; causing many to turn to massage as a means to pay off their debt.

IMBs also play upon cultural stereotypes that present Asian women as submissive and highly-sexualized. "The bodies of Asian women are exoticized and hypersexualized, and the perceived submissiveness of some Asian cultures is glamorized and erotized. This fetishization reduces Asian women to an inaccurate and detrimental stereotype, and creates staggering rates of violence. These alarming rates of violence clearly demonstrate the need to acknowledge and halt the racial discrimination behind it" (Dewey, 2016).

The Atlanta Spa shootings of March 2021 (CBS Atlanta, 2021) that resulted in eight deaths—including six Asian women—are a recent tragic example of this violence, exacerbated by the anti-Asian racism and hatred currently surging in US society. Unfortunately, this is not a new phenomenon. It has been argued that "the illicit massage parlor industry is built on hate crimes against Asian women" (Hsu, 2021).

#### **The Impact of COVID-19**

The pandemic and the restrictions put in place to control its spread have had a substantial impact on human trafficking. To curtail transmission of the virus, many public officials in the US and in Ohio mandated the use of

preventative measures, restricted travel throughout the US and the globe, and closed schools, businesses (including massage establishments), and other public venues where large gatherings are common.

Regardless of the type of human trafficking or venue where the crime takes place, the COVID-19 pandemic has effectively increased individual and systemic vulnerabilities around the world, making more individuals susceptible to trafficking overall and further exacerbating the vulnerabilities of existing human trafficking victims. An increase in poverty, unemployment, and housing insecurity puts these individuals at risk of being pushed into illegal economies with a higher chance of exploitation (UN Women, 2020). The populations most affected include low-skilled workers, migrant communities, and workers in "informal economies"- all populations that are disproportionately represented in IMBs.

Critical services for victims of human trafficking have also experienced massive interruptions during the pandemic. Both law enforcement and victim service organizations have been hindered in their ability to effectively protect and respond to the needs of victims due to protocols designed to impede the spread of the virus. Law enforcement has been challenged in their ability to conduct in-person interviews, raids of massage establishments, and other operations due to staffing shortages. Victim service organizations have struggled to effectively identify victims,

provide housing accommodations, and carry on other critical social services. They have also been affected by losses in funding as grants have been reallocated to efforts targeting the pandemic (Former Prosecutor)

The already lucrative and hidden crimes of sex and labor trafficking have become all the more lucrative and hidden during the COVID-19 pandemic. IMBs, which are particularly effective in their networking abilities across the US, quickly adapted to the new regulatory climate the pandemic created and took advantage of law enforcement and victim service organizations' setbacks.

# OVERVIEW OF IMBS

The prevalence of IMBs can be observed at the national, state, and local levels. Polaris has identified 25 business models for human trafficking operations at the national level, one of which is IMBs. The National Human Trafficking Hotline, operated by Polaris, provides yearly reports summarizing data from calls, texts, and chats regarding cases of human trafficking. In 2019, the hotline recorded 11,500 human trafficking situations involving 22,326 total victims and survivors. Of those, the illicit massage/spa business was the top reported venue for sex trafficking with 1,247 situations. IMBs have been the top reported venue to the National Hotline since 2017, and the number of cases of IMBs have been steadily increasing since 2015. Hotline statistics for Ohio showed 450 cases reported in 2019 with IMBs the top venue/industry for sex trafficking in the state (35 cases).

Victim - workers of IMBs are frequently recruited on the East and West Coasts of the US where ports of entry

are located. Some ports of entry include New York, Los Angeles, and San Francisco. Victims are generally middle-aged women from East Asia who arrive in the US on work visas, typically in order to earn money to send back to their families and often to pay an existing debt. They are then recruited with promises of a job, a place to live, and overall, a better life. Once victim-workers have been recruited, they are then transported to other areas within the US.

Victim-workers are typically recruited in this fashion through fraud and coercion. Traffickers lure them with offers of room and board, a steady income, and the relative safety of working in Ohio compared to work in New York or other "big cities." The fact that managers are of the same nationality as the victim-worker makes them seem trustworthy. These "favors" provided by the trafficker increase the dependency of the victim-worker on the trafficker for their livelihood. This dependency is even higher in Ohio due to

social isolation caused by the lack of large Chinese communities or neighborhoods (e.g., "Chinatown"). Since traffickers are the same ethnicity or nationality as the victim-workers, they are familiar with victim-workers' social and cultural norms. They often appeal to a victim-worker's sense of family and belonging in order to coerce them to remain with the establishment. Additionally, traffickers threaten victim-workers' families back in their home countries or create fear about their treatment by US authorities. Withholding passports and immigration documents and threatening to report victim-workers to ICE is a common tactic. Traffickers may also use physical force in order to control and incite fear in their victim-workers, though in the case of IMBs, fraud and coercion are the most common tactics used for recruitment and control. Traffickers will also frequently rotate victim-workers between multiple locations in order to prevent them from developing relationships with other workers or

customers and to disorient and confuse them. Due to these means of control, victim-workers are unable or unwilling to leave the situation. Often, because of a culture of shame that exists around illicit sex, they will not acknowledge their situation to themselves or others.

## TOP VENUES/INDUSTRIES FOR SEX TRAFFICKING

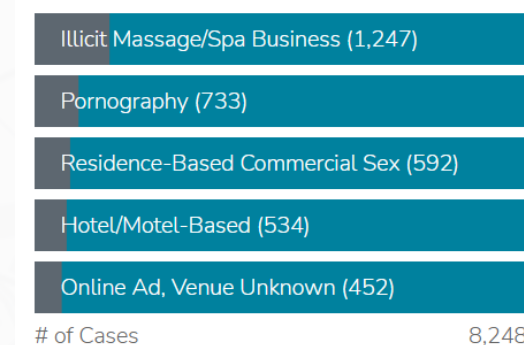


Figure 2. Source: National Human Trafficking Hotline Statistics (2019)

*The case studies presented below are composite cases based upon the stories of several victim-workers who have received services from Asian American Community Services in Columbus, Ohio (AACSOHIO.ORG). Their names and certain other details have been changed to protect their anonymity.*

## CASE STUDY #1: "TING"

Our advocates were asked to assist with a law enforcement action at an area massage parlor. Law enforcement had previously sent undercover officers to confirm their suspicions of sex work at the business. There were 4 women in the business when the law enforcement action took place. When we first met Ting, she denied any involvement with the business. Over time, as rapport was built, we learned that Ting was 56 years old. She had been forced to stop working at age 50 due to a policy in China which requires blue-collar female workers to retire at 50; white-collar female workers to retire at 55; and men to retire at 60. When her husband was also forced to retire, she found that they did not have sufficient funds to live. She decided to travel to the US to work for a few years and save up enough to retire. At that time, she would return back to China. She left behind her husband and adult daughter. Her daughter loaned her the \$20,000 that Ting stated was needed to come to the US. She did not initially seek massage work, but was having trouble finding work on her visitor visa—which did not allow her to legally work in the US. At a friend's birthday party, another guest told her that she knew someone who might be able to help her. She told her that massage was easy work, paid well, and that she could live at the massage business to save more. When Ting arrived at the business, she was charged for massage lessons, food, and rent to work and live there. She was also told that if she wanted to make better money, she could provide sexual services. Ting initially declined to provide sex services, but eventually this was required of her in order to earn enough for the business. Ting's daughter had married into a prominent family, and Ting was terrified that news of what she was doing in the US would return to her hometown. She was worried that this would bring shame to her family. When she began working with AACCS, she was wary of sharing any information with anyone. Over time, she agreed to work with law enforcement if they would protect her identity. With the help of a pro bono attorney, she received a T-Visa, a specialty Visa for victims of trafficking. She took English classes while waiting for her Visa, and eventually relocated to Los Angeles, where she obtained a driver's license and completed her certification in phlebotomy.



## CASE STUDY #2: "LIN"

Asian American Community Services first came into contact with Lin during her third day in county jail. She was scared and unwilling to cooperate with law enforcement officers, which resulted in her coming across as evasive—when in reality, she had just been coached on what to say by her traffickers. She attempted to call her boss several times, but there was no answer. After working with advocates at AACCS, rapport was built. Lin told us that she was 57 years old and was Taiwanese. She had three sons and her family was working class. She was a street vendor, selling clothing and accessories, but this didn't produce a steady income or job security for her. She was also struggling with a gambling addiction. Through her gambling, Lin met a Chinese woman who encouraged her habit—eventually, Lin owed her a hefty debt. The woman took Lin to a small tourist city in southern Taiwan and forced her to work in a brothel to pay off her debt. Due to her age, Lin struggled to earn enough money to pay down her debt. The woman told Lin that she could work in the US and make more money to pay the debt back sooner. Lin came to the US on a tourist Visa three times. Each time, she stayed about 4 months and earned about \$15,000. When she was arrested, she stated that she was nearly done paying off her debts. Lin wanted to return home, and AACCS assisted her in returning. She was connected with services in Taiwan, including help with her gambling addiction. When we last spoke, she told us that she was a grandmother and planned to help her sons raise their children.

IMBs are made up of criminal networks that consist of various actors. Apart from the trafficker themselves, these can include the recruiter, managers, managers-in-training, a second-in-command, owners, transporters, and the “johns” or buyers who purchase sex from the establishment. Also, facilitators or intermediaries such as real estate agents, landlords, drivers, and attorneys are involved in these criminal networks. Other facilitators, such as illicit massage rating and advertising websites like RubMaps.ch, AdultSearch.com, and Bedpage.com, further support the business of IMBs. Individual businesses are frequently operated by families, with women often functioning as the face/manager of the operation.

The criminal networks of IMBs are able to operate and evade law enforcement detection by benefiting from loopholes in state laws and local ordinances. For example, IMBs frequently operate under the guise of legitimate businesses, i.e., as a shell company, in which a trafficker may operate an IMB while registering the business as a shop, a restaurant, and so forth. IMBs will also use specific tactics to obscure buyer behavior, such as offering back or side-door entrances to buyers, using buzzer-controlled front doors, or only opening the doors to male customers.

Owners often operate a network of IMBs using leased commercial properties. This can lead to a “whack-a-mole” effect in which a successful law enforcement raid or investigation will shut down an IMB only to find it reopening nearby under a different

name. Identifying and shutting down an entire network of IMBs is the best strategy to effectively prevent traffickers from continuing to gain profit (see Kara, 2017). For this reason, a multi-jurisdictional, state-wide or even inter-state regulatory framework has the most potential to make operating these businesses and controlling these networks more difficult for traffickers.

### **Who Are the Buyers?**

Customers of commercial sex go by many names: “Johns,” “hobbyists,” and “mongers.” They’ve long been the topic of speculation and research, much of it erroneous<sup>1</sup>. Better conceived studies in recent years provide a more accurate profile of sex buyers. Sex buyers are overwhelmingly male (99%) and are very similar to men who have never paid for sex. 14% of US men have purchased sex at some point in their lives (Monto & Milrod, 2014). Over the past 12 months, the percent who have purchased sex range from 1% (Monto & Milrod, 2014) to 6.2% (Demand Abolition, 2018). Men with military service are much more likely to have ever paid for sex and slightly more likely to have bought in the past year (Monto & Milrod, 2014).

“Active” or “high frequency” buyers are slightly different from less active buyers. Demand Abolition (2018) found that while demographic traits are poor predictors of sex buying—race and sexual orientation have almost no profiling power and buyers can be of all incomes—active, high frequency buyers are more likely than other men to make \$100,000 or more a year. In

an analysis of “hobbyists” recruited from The Erotic Review website, Monto and Milrod (2014) found that these regular buyers tended to be older (50-59), white, educated, high salary males.

While there is little information specifically about IMB customers, Demand Abolition (2018) found that about 1 in 4 active buyers buy monthly or weekly and these high-frequency buyers listed IMBs as their favorite venue. Analyzing users of the RubMaps website, Polaris (2018) found them to be significantly more Caucasian, wealthier, and older than general internet users. They stressed though that, IMB “buyers generally reflect the demographics of their communities, and therefore come from all walks of life” (p. 17).

<sup>1</sup>Monto & Milrod (2014) present a good overview of the history of studies about sex buyers.

# FOCUS ON OHIO

Massage rating and review websites such as RubMaps.ch and AdultSearch.com provide a picture of the extent of IMBs across Ohio. These websites allow individuals colloquially known as “hobbyists” or “mongers” to rate their experiences with illicit sexual activity at massage establishments. According to the Ohio Revised Code (ORC) 2927.17, it is illegal to advertise massage with the suggestion or promise of sexual activity. However, advertisements and reviews for IMBs are often blatantly sexual in nature and/or make explicit references to the race of the massage therapist.

## EXAMPLES FROM THE GREATER DAYTON REGION

**iamin10s**  
★★★★★  
Reviewed 11-27-2012

If you're looking for a **HE**, this place will deliver. I have been here several times. They offer both 30 and 60 minutes sessions. When you roll over you will be at full attention, and then the **HE** price is negotiated. All I've ever gotten is a hand job. Usually \$40 tip for that.

[Please login to add comments to this review](#)

**Figure 3.** This is a review listed on massage rating website AdultSearch.com as of January 2020. Here, a “hobbyist” details his experiences receiving a HE or “happy ending” at a massage parlor. “Happy ending” is a colloquial slang word used to describe a commercial sex act, typically performed in a massage parlor.

**Lemon Massage** ★★★★★

Address	
3081 Valley St Dayton, 45404, US	
Phone	Website
(937) 626-8696	<a href="http://lemonmassage.club">http://lemonmassage.club</a>
Facilities	
Table Shower <b>NO</b>	Rate for 60 minutes <b>\$ 60.00</b>
Sauna <b>NO</b>	Rate for 90 minutes <b>\$ 90.00</b>
Jacuzzi <b>NO</b>	Accepts Credit Cards <b>NO</b>
Rate for 30 minutes <b>\$ 40.00</b>	Masseuse <b>Asian</b>


Currency convert

Your Business?


Report an error

Photos

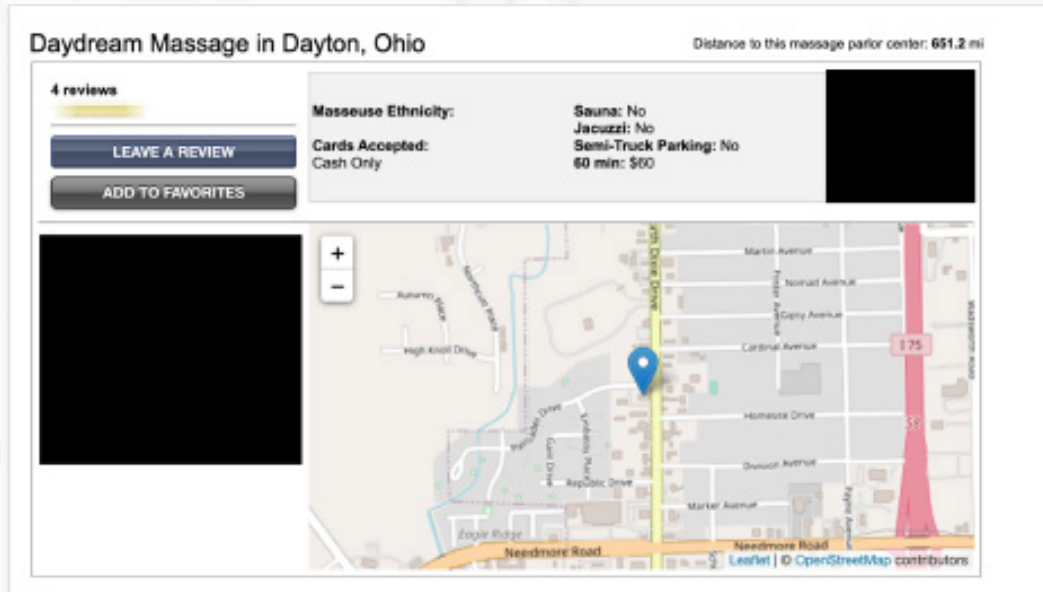
+ Upload photos  
+ Upload videos



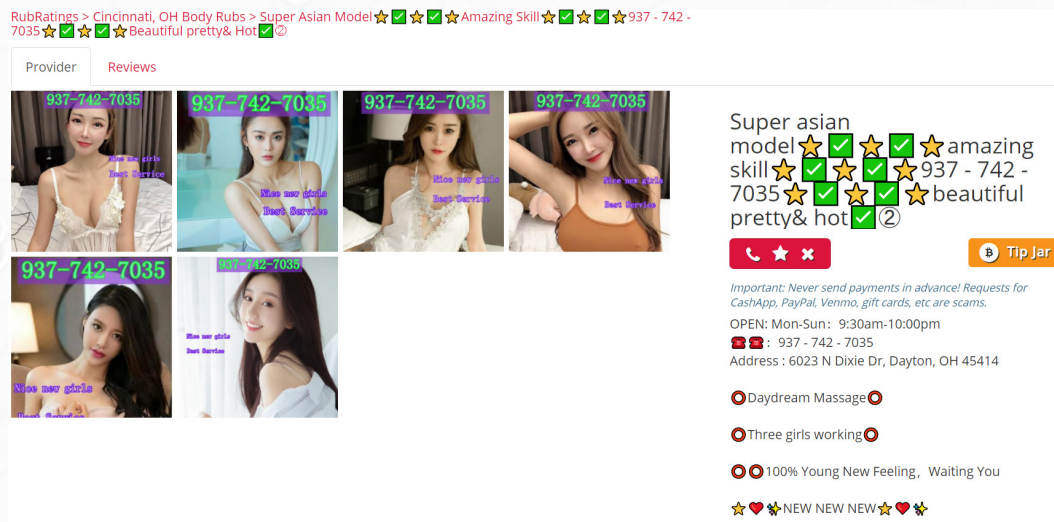
Directions



**Figure 4.** This is an advertisement for a massage parlor in Dayton, Ohio listed on massage rating website AdultSearch.com as of February 2021. Details of the establishment include the ethnicity of the massage therapists working there.

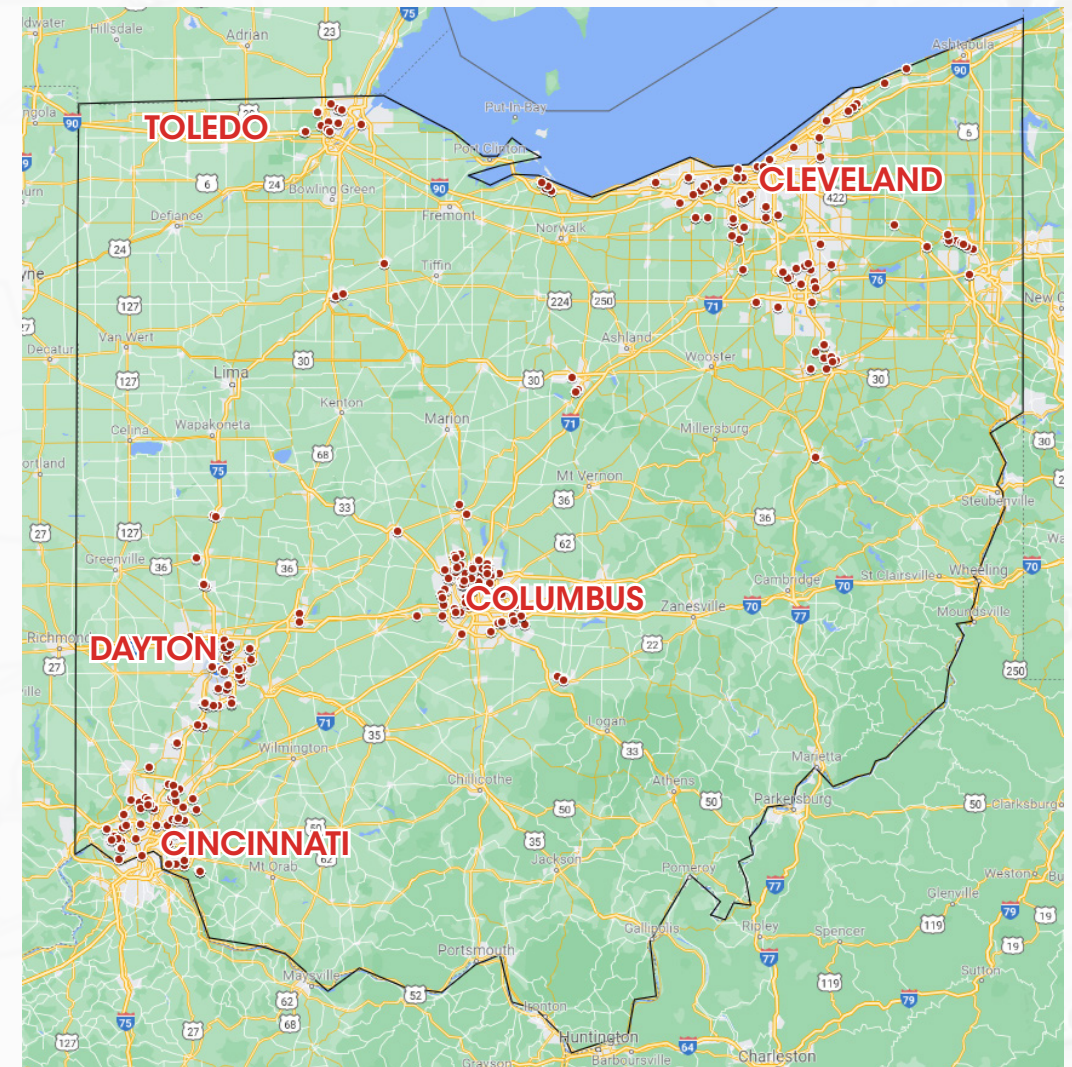


**Figure 5.** This is an advertisement for a massage parlor in Warren County, Ohio listed on massage rating website RubMaps.ch as of February 2021. Details of the establishment include the ethnicity of the massage therapists working there.



**Figure 6.** Online advertisement for an IMB located in Dayton taken from Rubratings.com in September, 2021. The ad clearly shows highly-sexualized photos of Asian women and uses the terms: "model," "beautiful," "pretty," "hot," "young," and "new" in the text of the ad.

Accessing the two websites, we identified 299 establishments across the state of Ohio during the period of 2012-2021. Of these 299 establishments, 156 were listed on RubMaps.ch as being closed at some point over the past 9 years while the remaining 143 gave no indication of being closed on either site. It is difficult to ascertain the true number of open IMBs since they tend to open, close, and shift location rapidly in response to law enforcement or other pressures. You can view the geographic distribution of these establishments in Ohio in Figure 7.



**Figure 7.** Indicated on this map are massage establishments that have been listed on erotic massage review websites Rubmaps.ch and Adultsearch.com. According to our assessment, we found 299 establishments listed between both sites dating back to 2012 that are located in the state of Ohio as of January 2021. Of these 299 establishments, 156 are indicated as possibly being closed on at least one of the websites. It is important to note that many of these establishments have closed due to law enforcement involvement or have closed and then reopened again under different names potentially not listed on either website.

## Media Coverage Analysis

An analysis of media coverage in Ohio over the past four decades also shows the pervasiveness of IMBs. News articles were categorized into three types of coverage: law enforcement actions (e.g., raids, arrests, investigations), municipal actions (e.g., public hearings, revision of local ordinances), and other (e.g., awareness raising events, legislative updates, coverage of high profile cases with links to Ohio) (Figure 8). All articles except one were accounts of events that were either implicitly or explicitly in support of anti-IMB, anti-prostitution, and/or anti-human trafficking activities. The one differing article was a denial of charges of prostitution at the Warren spas by a defense attorney representing one of the accused in 2012. The attorney made a statement critiquing the IMB investigations as a misuse of scarce law enforcement resources.

The year 2012 saw the most articles published (23); followed by 2016 (11); then ten articles each for 2011, 2013, and 2019 (Figure 9). The COVID-19 pandemic and related disruptions almost certainly reduced media coverage of IMBs for 2020. The high number of news articles in 2012 was due to extensive coverage of joint state and local law enforcement operations against nine spas in Warren, Ohio. Twelve of the 23 total articles that year concerned the spas in Warren. However, removing these duplicates from the analysis still shows a large increase in media coverage of IMBs

over time; from a low of 0.2 articles per year in the 1980s to a high of 7.4 articles per year in the 2010s (Figure 10). The dramatic increase in coverage over the years indicates an increase in the importance and awareness of the issue of IMBs.

According to media reports, over thirty Ohio cities and townships have conducted raids, investigations, and other law enforcement actions at IMBs over the past four decades. Seven locations have conducted actions multiple times over the years. Eighteen of these reports mentioned arrests being made. Similar to the location of the IMBs (Figure 11), nearly all of the law enforcement actions took place in urban areas. While we lack sufficient information to offer detailed analysis of these actions and their impacts is beyond the scope of this report, the wide geographic spread and generally increasing number of actions over the years (Figure 12) seems to indicate that IMBs are a serious issue for communities across the state.

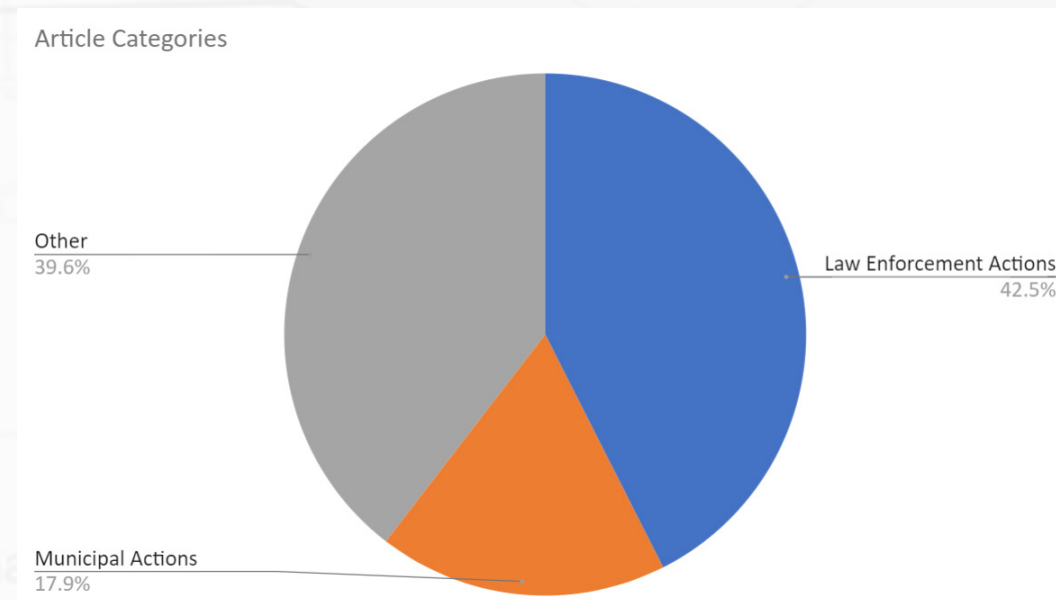


Figure 8

Number of News Articles over Time

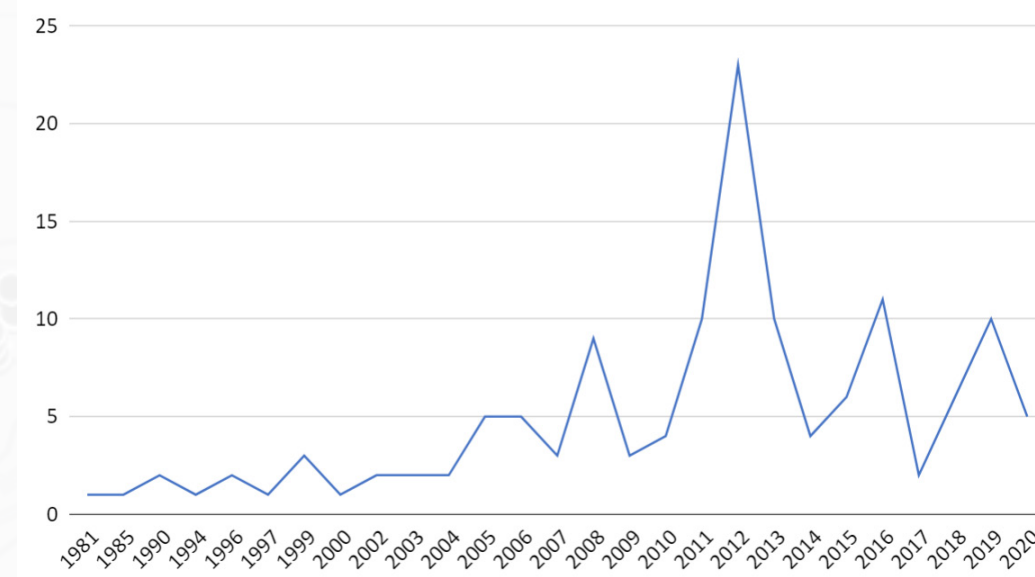


Figure 9

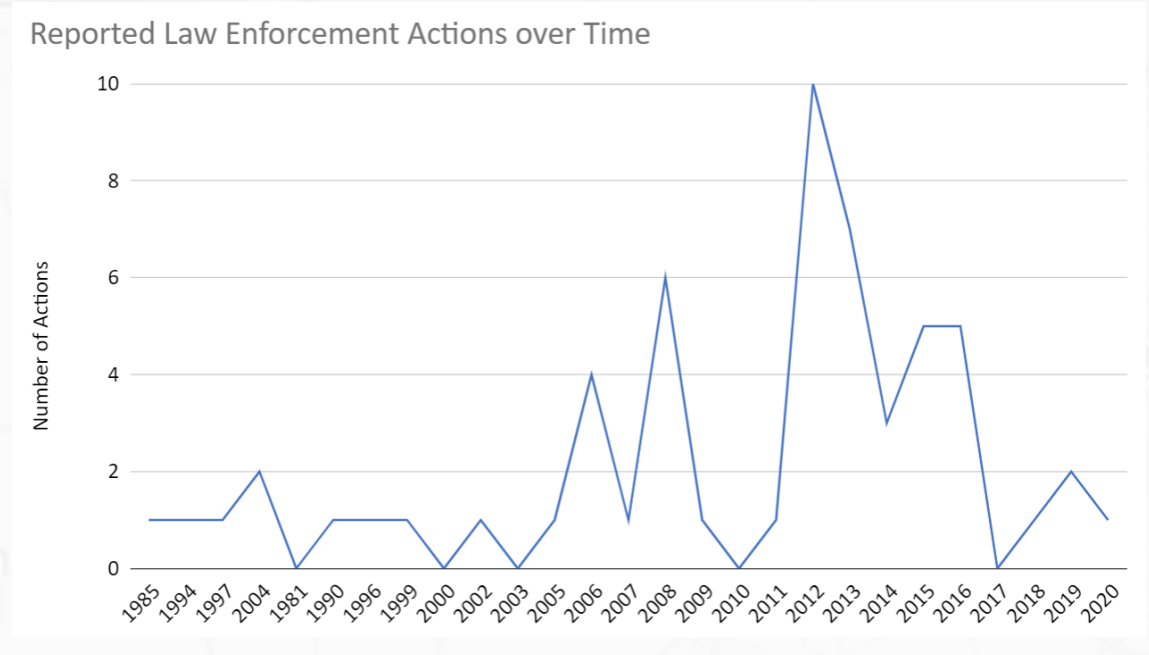
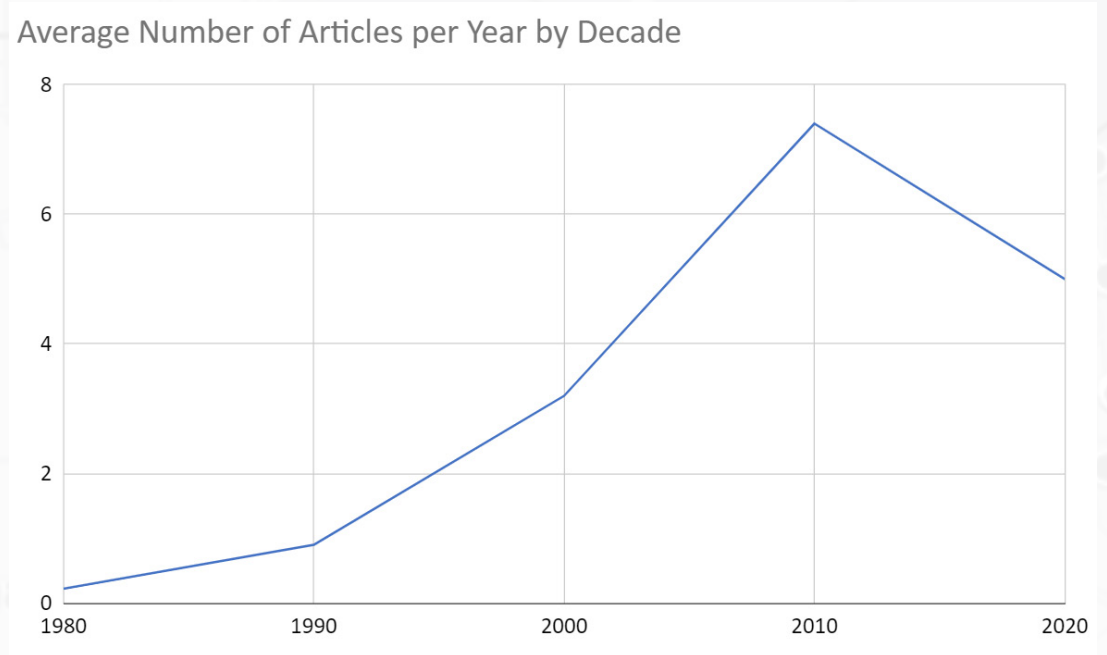


Figure 10

Figure 12

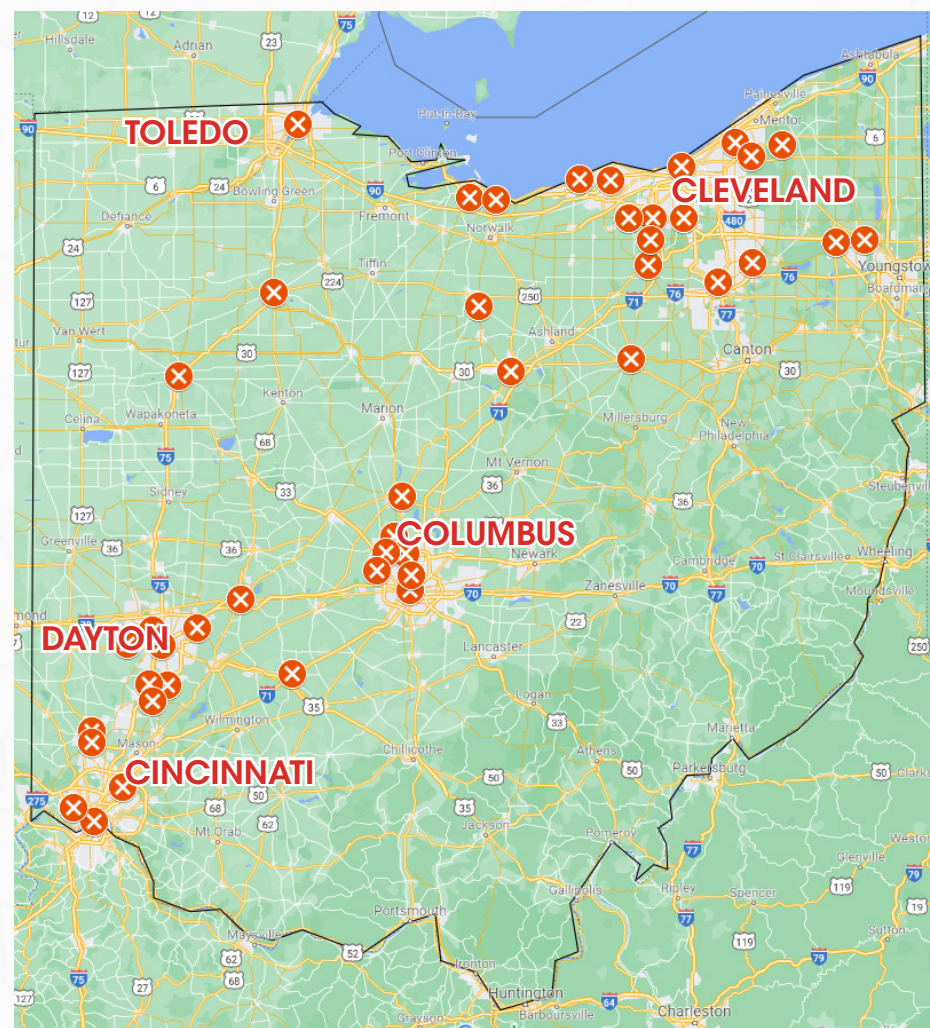


Figure 11. Locations of Law Enforcement Actions Reported in News Media, 1981-2020.

# INSIGHTS FROM EXPERTS

***“WHEN WE FOUND HER— SHE WAS TERRIFIED... CRYING AND SCREAMING... SAYING PLEASE DON’T KILL ME. I DON’T WANT TO DIE HERE ALONE. MY FAMILY CAN’T EVEN COLLECT MY BODY. I’LL BE A SOULLESS GHOST FLOATING ACROSS THIS FOREIGN LAND.”***  
***(RESEARCHER/ ADVOCATE)***

Based on a series of interviews with key stakeholders and experts on IMBs in Ohio during 2020 and early 2021, we found that human trafficking in IMBs is a serious problem which is not clearly understood by law enforcement, government officials, service providers, or advocates. IMBs are described as complex networks of criminal exploitation primarily involv-

ing Chinese and, to a lesser extent, other Asian victim-workers, managers, and owners. Vulnerable migrant women, usually 30-50 years old, are transported into Ohio from Chicago; Flushing, New York; Los Angeles; and other cities via Chinese-owned interstate bus services (i.e., the “China Bus”) or Chinese ride-share services. The WeChat social media app is most often used to advertise, recruit, and maintain contact and control of victim-workers.

## **Race and Nationality Play a Large Role in IMBs**

Most IMB victim-workers are poor Chinese women who incurred a large debt as part of the process to get to the US. Managers, also Chinese, use fear of the authorities, manipulation of cultural norms, and social isolation as means of controlling victims. Fear, desperation, distrust, strong cultural norms of loyalty to their employers, immigration status, and the impact of trauma combine with language

barriers, cultural insensitivity, and the lack of a victim-centered response by police in many cases to create insurmountable barriers to coming forward and cooperating with investigators.

While it is estimated that 84% of IMBs in the US are Chinese operated (Heyrick Research, 2019), Korean women also are victimized within Korean-owned IMB networks. Similar to Chinese victim-workers, these women are often heavily indebted and subjected to exploitation and control by criminal networks.

Imperialism, colonialism, and militarism play into the racial dimensions of IMBs. Doolan (2019) states that: “Military prostitution has been a staple of US–Korea relations since the 1940s.” She argues that the reduction in US troop presence in Asia in the post Vietnam War period led to the “importation” of Asian madams and sex workers into the US and directly contributed to the spread of Asian

massage parlors across the country. This is supported by the view of one of our interviewees, an advocate and researcher of Asian descent, who claimed that, in her experience, a majority of customers at IMBs are older, white males—many with military service or with friends or family who served—who are trying to relive experiences they had—or fantasized about—in brothels and massage parlors while on military duty.

Over emphasizing the racial dimensions of IMBs has potential negative implications. It is important to differentiate between Asian-Americans’ and Asian migrants’ experiences and the distinct abuses and exploitations they suffer. While the tragic mass shooting at three spas in Atlanta on March 16, 2021 has been characterized by many as an anti-Asian hate crime<sup>2</sup>, the shooting took place within a broader context of anti-Asian violence linked to the COVID-19 pandemic that had very little to do with IMBs or commer-

<sup>2</sup>The Atlanta shootings prompted the [US Senate to pass an anti-hate crime bill](#) and the [Fulton County Prosecutor has announced that the shootings were hate crimes](#).

cial sex. A focus on race could obscure and distract from the issues of sexism and systemic economic exploitation of lower class women by criminals of the same nationality or ethnicity (e.g., rural Chinese women exploited by urban Chinese criminals, indebted Korean women exploited by Korean criminals). “The whole phenomenon is being portrayed as racism [but this] in itself is very politically motivated as opposed to what’s actually going on....[Racism] is not the biggest issue that these women suffer...it’s because they’re women” (Researcher/Advocate).

A general finding is that there are certain cultural factors specific to East Asia that play a major role in IMBs. Cultural influences on class and gender reinforce patriarchal structures, increase gender inequality, and create vulnerabilities that can lead to exploitation. For example, South Korea has the largest gender pay gap among Organization for Economic Cooperation and Development (OECD) countries (OECD, 2019). Chinese cultural norms of respect for elders and creating fictive kinship networks (i.e., calling your manager “older sister”) along with norms of “saving face” or “giving face” (guanxi) can lead victim-workers to not question traffickers nor report them to authorities. This contributes to a system of gender and class-based debt bondage and exploitation within IMBs. The relative powerlessness of many migrant Korean and Chinese women, cultural norms of subordination, and high levels of debt that is serviced by fraudulent and criminal loan sharks, creates overlapping vulnera-

bilities leading to exploitation within networks of IMBs in the US.

### **The Sexualization of the Massage Profession Creates a Dangerous Environment**

**“IT’S VERY UNFORTUNATE THAT THEY’VE USED OUR PROFESSION TO HIDE BEHIND.”  
(MASSAGE THERAPIST)**

A key concern is how the massage industry has been sexualized in law and society. Most massage therapists are female and they put up with a lot of harassment, innuendo, even sexual violence due to expectations of certain male customers. “You can be completely legitimate and this still bleeds into your practice. We have to be on our toes all the time.” (Massage Therapist). Some law enforcement still cling to “antiquated ideas,” making jokes about “happy endings” and arguing that women engage in commercial sexual activities as a part of massage therapy purely as a matter of choice (Former Prosecutor). Such prejudices and misconceptions reinforce the sexualization of massage therapy by society, creating a dangerous environment for legitimate massage therapists due to the expectation of sexual encounters or services by some customers. Added to this are stereotypes of Asian women as highly sexualized and submissive. These preconceptions, misconceptions, and prejudices can combine to create a hostile environment for all who practice massage—at legitimate establishments or in IMBs.

The use of antiquated and sexualized language to describe massage is not uncommon among policy makers and legislatures. “Some of the old language used to be as specific as to tell me what color undergarments I’m able to wear....I know [the laws] were written to eliminate prostitution but at the same time it sexualizes our profession” (Massage Therapist).

### **COVID-19 Increased Vulnerability and Deprivation**

The COVID-19 pandemic impacted victim-workers at IMBs in many different ways: possible sickness and death, loss of income, uncertainty, and fear of racial tension for Asian workers. “I personally know of three victim-workers who died during the COVID period. They were forced to go back to work when the state was still shut down.” There was no PPE, no temperature checks, and even if the person had symptoms, the manager said “that’s money coming to the door and I’m not going to let you refuse that” (Researcher/Advocate).

The state medical board has detailed health requirements for legitimate massage clinics to follow during the pandemic but the illegitimate ones “literally had no one to account to for their behavior and practices” (Massage Therapist). This threatened the health of workers and customers.

In other cases, establishments shut down due to COVID, causing victim-workers to lose wages and depriving many of places to live: “If you don’t work, you have no right to stay at that particular massage parlor—and most

of the time, that’s where they’re living” (Researcher/Advocate). Some of the closed establishments made a switch to outcall services and undercover/residential brothels and spas. In other words, COVID probably led to an increase in commercial sexual exploitation and trafficking within this population. At the same time, pandemic-related travel restrictions, especially from China, caused a reduction in available workers for IMBs while the demand remained relatively high. This led to an increase in the prices for the services at IMBs. According to advocates, very little, if any, of the increase made it to the workers.

COVID restrictions led to complete cessation of inspections in some jurisdictions. Not only did this interfere with possible law enforcement actions, it also stopped outreach efforts to victim-workers. “It’s been horrible. Obviously we can’t do any of our inspections and that’s very important... because we’re just going to talk to them, to try to let these women know there are resources out there... But [due to COVID] we haven’t been able to do inspections. We haven’t been able to reach out to these women” (City Attorney).



## IMBs are Different from Other Criminal Enterprises

**“IMBS FELT MUCH MORE ORGANIZED... AND HAVE LARGER NETWORKS THAT THEY’RE CONNECTED TO, AND SO THEY ALWAYS SEEMED LIKE THEIR OWN KIND OF ISSUE, THEIR OWN KIND OF ANIMAL.”  
(FORMER PROSECUTOR)**

Several key differences between trafficking in IMBs and other common types of trafficking make these cases very complicated for law enforcement and social service providers. Some of the important characteristics of IMBs are:

- Combination of sex and labor trafficking
- Culture and language barriers
- Networks of managers/owners
- Ties to (international) organized criminal networks
- Victims usually reside on site

For these reasons, investigating cases of IMBs is very difficult and resource-intensive. Moreover, if they are not successful in establishing criminal liability for the owners and managers, they have little impact. The operators just reopen in a new location.

Asian criminal networks are very sophisticated and organized to maximize revenue from the manipulation of the debt of exploited individuals. Victim debt is manipulated so that it

continues to increase over time. The debt and the victim are bought and sold—traded between IMB networks. Each trade increases the amount of debt. Criminals use fear, intimidation, and manipulation to ensure victims do not identify themselves as victims to service providers, law enforcement, researchers and other outsiders. Victims will say that they are not being controlled but are acting on their own.

### Views on Regulation Differ

**“YES IT ADDS A BIT MORE REGULATION TO US IN THE END, BUT IT’S THE ONLY WAY TO DO THIS BECAUSE YOU HAVE TO GIVE LAW ENFORCEMENT THE TOOLS THEY CAN USE TO MAKE THIS SIMPLER THAN A STING OPERATION.”  
(MASSAGE THERAPIST/ ADVOCATE)**

While all interviewees called for legal reforms, they disagreed on what would be effective in reducing the problem of trafficking in IMBs. Several massage therapists, advocates, and investigators support the bills currently moving through the Ohio state legislature (SB 55 and HB 81), especially the requirement for universal licensing and oversight of all who perform massage in the state. Others were skeptical of the impact of requiring licenses. They pointed out how criminals could still gain licenses through

fraud and corruption or that changing the name or type of establishment to something that does not require a license would be a way to side step the requirement (Former Prosecutor). A researcher-advocate further pointed out that the criminal networks behind the IMBs are highly adaptive. For example, they will employ attorneys to find new legal loopholes in order to continue operations.

It is very difficult to develop policy that will actually make a positive impact on these networks due to the adaptability and sophistication of the criminal networks: “The brothel owners, the madams, the loan sharks—the organized criminals—are the ones who work out how to manipulate the system... just because it’s legalized or criminalized or whatever doesn’t change the fact that they’re still going to make money off of these women” (Researcher/Advocate).

A city attorney who has been involved with many IMB cases agreed that it is difficult to have any impact on the owners and their networks of IMBs. “It seems like those businesses will never actually go out of business, unless you make a financial dent in them. They don’t care about the women. They don’t care about the criminal charges that they get... money is not an issue for them. So you really have to make a huge financial dent for them to be like all right, let me take a step back and take a break.”

Local governments are concerned about IMBs but do not know how to deal with the situation. There is a lot of deferring of responsibility to other in-

stitutions or entities—law enforcement, health inspectors, zoning inspectors—and a realization of how limited their set of responses were, other than expensive police investigations and sting operations. Additionally, even if a municipality tightened its restrictions on IMB operations, the result has been that they just closed up and moved outside city limits. In light of this, most agreed that empowering townships by changing state law is important.

Several interviewees spoke of a promising new approach to controlling IMBs at the local level using a “nuisance abatement” strategy. This approach involves a coordinated inspection of the property housing the IMB that is conducted by health inspectors, police, city officials, and other agencies. Victim service providers, often from the Salvation Army or Asian American Community Services, accompany the inspectors. The officials look for code violations that could constitute a public nuisance. While on site, the team tries to speak with any worker-victims present, to build rapport and offer services. They also look for signs that workers are living on site, evidence of commercial sex activity, and indicators of human trafficking.

# STATE AND LOCAL EFFORTS

Advocacy and legislative efforts to reduce the number of IMBs are happening at both the state and local levels. Currently, Ohio law allows for the unlicensed practice of massage at establishments as long as it is not advertised as “massage therapy”, “medical”, or “therapeutic” massage. Massage venues that do not have licensed massage therapists employed at the establishment are often fronts for human trafficking. For example, Senate Bill 55 and House Bill 81 (GA134–2021-2022) would change licensing laws for individuals who practice massage.<sup>3</sup> The bills would require all massage venues to employ licensed massage therapists. This would give the State Medical Board and law enforcement greater oversight in ensuring that massage is being performed appropriately. It is also a more cost effective means of enforcement since license inspections are less time and resource intensive than criminal investigations.

Additionally, the bills would give unincorporated townships the jurisdiction to regulate massage businesses within their territory. Human traffickers that operate networks of IMBs will often take advantage of the lax legislation within unincorporated townships by moving their operations to that township if another, incorporated municipality adopts ordinances that heavily deter the operations of IMBs. Allowing unincorporated townships to regulate massage businesses will help to frustrate the efforts of traffickers who attempt to move their operations to locations with more lax regulation and will improve the capacity of law enforcement to shut down criminal networks of IMBs in their entirety. House Bill 81 was passed by the Ohio House of Representatives in June. The state senate has not yet voted on the measure.

These bills are a re-introduction of bills from the last General Assembly. Senate Bill 105 and House Bill 374

(GA133–2019-2020) had several hearings before committees but they failed to win passage. The bills were favorably remarked upon by committee members in 2020, so it is likely that the COVID-19 pandemic and Presidential election issues derailed the legislation.

Local governments in Ohio have partnered with organizations such as Polaris and the American Massage Therapy Association to develop their own ordinances for combatting IMBs. According to our media dataset, fifteen different municipal governments across the state have held hearings or passed ordinances dealing with IMBs over the past two decades (Figure 13).

	Municipal Action
2020	Middletown
2020	Beavercreek
2019	Kettering
2018	Fairborn
2018	Miamisburg
2018	West Carrollton
2017	Carlisle
2017	Monroe
2016	Springboro
2015	Columbus
2012	Warren
2008	Moraine
2005	Lima
2003	Fairfield
1999	Huber Heights

Figure 13

<sup>3</sup> HB 81 unanimously passed the Ohio State House on 6/24/2021 and was introduced in the Senate on 6/28/21.

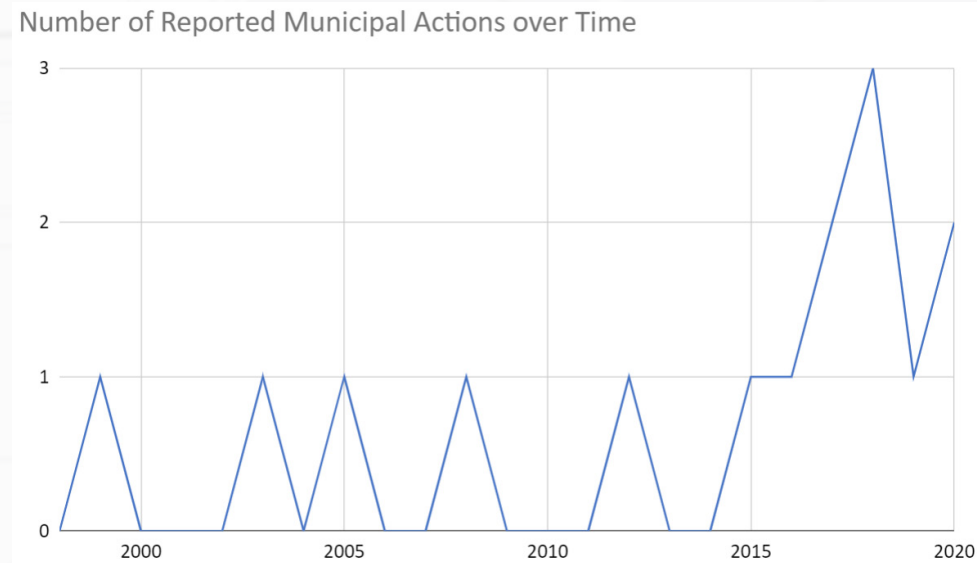


Figure 14

The number of municipal actions increased dramatically after 2016. From 1999 to 2016 there was an average of one municipal action every 2.6 years. From 2017-2020 the average number of actions increased to two every year—a growth of over 400% (Figure 14). Local officials appear increasingly concerned about IMBs in their cities<sup>4</sup>.

#### Nuisance Abatement as a Municipal Strategy against IMBs

Nuisance abatement is a tool of community policing or problem-oriented policing that refers to the use of building codes, fire codes, zoning ordinances, etc. to promote the betterment of life and to resolve safety issues within neighborhoods. Most municipalities have different departments (e.g., Fire, Animal Control, Police, Sanitation, Housing Authority) that handle different issues in isolation from each other. Nuisance abatement programs seek to overcome the individual department approach and provide information sharing and a coordinated

response. Effective nuisance abatement programs can improve upon short term suppression of criminal nuisance and achieve longer term successes by changing behavior patterns (Norris, 2019).

In general, to constitute a public nuisance, a business must endanger a neighborhood's health and safety, be offensive to the senses, or render the enjoyment of life and property uncomfortable (USLegal.com). Criminal operations, such as IMBs, often generate numerous diverse complaints from the public: trash accumulation, noise, loitering, etc. as well as fire, health, and zoning violations. Information and resource sharing across responsible departments to generate a nuisance abatement order can prove more effective than the traditional approach of law enforcement to commercial sex-related crimes at known problem locations, which often have only a temporary impact (Hill & Bruce, 2017).

In addition, under this approach, inspections of IMBs can take place in a less threatening manner with non-uniformed personnel and accompanying service providers who ask questions and have a better chance of gaining trust and rapport with victim-workers. In contrast, police raids are much more stressful and frightening. They involve armed and uniformed officers and may lead to the arrest of victim-workers, even if that is not the stated intent. Several US cities, such as Houston, Texas and Columbus, Ohio, have implemented civil nuisance abatement programs specifically aimed at IMBs (Hill & Bruce, 2017; Columbus City Attorney, 2018).

<sup>4</sup> Some of the increase in media attention paid to human trafficking and IMBs may be related to the focus placed on the issue by former president Trump and by the high profile case of Robert Kraft in 2019.

# ASSESSING THE MUNICIPAL RESPONSE

In order to evaluate the extent to which local municipalities in the Dayton and surrounding area have strong legislation to close loopholes for IMBs, a policy assessment was conducted using nine defined characteristics to evaluate municipal codes of 28 incorporated municipalities in the greater Dayton area (Figure 15).

It is important to note that this assessment was conducted with municipal data in 2019. As such, some municipal codes referenced in this section may have changed since the initial assessment was conducted. A chart summarizing the results of the assessment can be found in Figure 16.

The first characteristic is **reference to unlawful advertisement of massage**, which is defined as a municipal code either directly referencing ORC 2927.17 that prohibits the advertisement of massage with the suggestion or promise of sexual activity or a municipal code containing its own provision prohibiting massage with

the suggestion or promise of sexual activity. Traffickers will frequently post sexually explicit advertisements on massage “rating” websites such as RubMaps, BedPage, and AdultSearch in order to attract customers. Advertisements such as these fuel the business of IMBs or other instances of human trafficking.

This was the most common characteristic included in legislation regulating massage establishments, with 22 of the 28 or over 75% of municipal codes including this characteristic. These municipalities are Enon, Springfield, Beavercreek, Bellbrook, Fairborn, Huber Heights, Piqua, Tipp City, Troy, Brookville, Centerville, Clayton, Englewood, Germantown, Miamisburg, Moraine, Riverside, Springboro, Trotwood, Vandalia, West Carrollton, and Eaton.

The majority of these codes directly reference the ORC 2927.17 which states, “(A) No person, by means of a statement, solicitation, or offer in a print or electronic publication, sign,

Characteristic	Definition
<b>Reference to unlawful advertisement of massage</b>	A municipal code either directly referencing ORC 2927.17 that prohibits the advertisement of massage with the suggestion or promise of sexual activity or a municipal code containing its own provision prohibiting massage with the suggestion or promise of sexual activity.
<b>Regulation of operating hours</b>	A municipal code’s restriction of the operating hours of massage establishments to times at the discretion of the municipality.
<b>Clarification of business ownership</b>	A municipal code’s inclusion of a provision which requires that the business owner of a massage establishment provide sufficient personal identifiable information to his or her jurisdiction through processes, such as the issuing of a business license or permit, so as not to obscure owner identity for the purposes of illicit activity.
<b>Regulation of entrances</b>	A municipal code’s prohibition of aspects of a massage establishment that obscure buyer behavior, such as side-entrances and buzzer-controlled front doors.
<b>Inspections</b>	A municipal code’s inclusion of mandatory requirements for inspections of massage establishments by code enforcers within applicable city departments.
<b>References ORC 4731.15</b>	A municipal code’s inclusion of the requirement that massage therapists employed by a massage establishment be licensed by the Ohio State Medical Board.
<b>References ORC 2907.39</b>	A municipal code’s inclusion of a provision which declares that establishments who employ massage therapists that are licensed by the state are not adult entertainment or sexual encounter establishments.
<b>Refraining from stigmatizing definitions</b>	A municipal code’s exclusion of massage establishment definitions which further stigmatize the profession of massage therapy (i.e. sexually-oriented businesses, adult entertainment establishments).

Figure 15

placard, storefront display, or other medium, shall advertise massage, relaxation massage, any other massage technique or method, or any related service, with the suggestion or promise of sexual activity. (B) Whoever violates this section is guilty of unlawful advertising of massage, a misdemeanor of the first degree. (C) Nothing in this section prevents the legislative authority of a municipal corporation or township from enacting any regulation of the advertising of massage further than and in addition to the provisions of divisions (A) and (B) of this section. (D) As used in this section, "sexual activity" has the same meaning as in section 2907.01 of the Revised Code."

One municipal code, Bellbrook, contains its own provision within its municipal code prohibiting massage with the suggestion or promise of sexual activity. Specifically, in section 848.06 of Bellbrook's municipal code, it simply states, "No individual shall advertise massage services or a related service using sexual or provocative words or images. No individual shall advertise massage services or a related service with the suggestion or promise of a sexual service or activity."

The second characteristic is **regulation of operating hours**, which is defined as a municipal code's restriction of the operating hours of massage establishments to times at the discretion of the municipality. Oftentimes, IMBs will operate during nighttime or otherwise, outside of other typical business hours which allows IMBs and buyers to evade detection by law en-

forcement or even members of the general public.

Of the 28 municipal codes in our assessment, six, or just over 20% of municipalities, included this characteristic. These municipalities are New Carlisle, Fairborn, Xenia, Centerville, Moraine, and Oakwood. For example, section 840.03 of Xenia's municipal code states, "It shall be unlawful for any massage establishment licensed as provided in this section to remain open for business or provide services any time between the hours of 1:00 a.m. and 6:00 a.m."

The third characteristic is **clarification of business ownership of massage establishments**, which is defined as a municipal code's inclusion of a provision which requires that the business owner of a massage establishment provide sufficient personal identifiable information to his or her jurisdiction through processes, such as the issuing of a business license or permit, so as not to obscure owner identity for the purposes of illicit activity. Identifiable information could include but is not limited to: The full legal name(s) of the applicant(s), the residential address of the applicant, the proposed business address of the establishment, or a document signed by the real legal owner of the property stating clarity of purpose of the establishment. However, while regulating the clarity of business ownership, municipalities should avoid further stigmatization of the massage profession by requiring massage business owners to provide information they would not need to provide were they to open a

business of another profession. Massage establishment regulation should regulate massage businesses in the same manner that other businesses within the municipality's jurisdiction are regulated.

Many IMBs operate under the guise of a shell company. A "shell company" refers to a false name, a business title, and/or other identifiable information that traffickers use while registering their business within a municipality in order to obscure the identity of the real owner of the IMB. For example, a trafficker may register the business under an alias and under a different business type, such as a grocery store. Shell companies allow traffickers to evade law enforcement when a raid or sting operation results in the shutting down of an IMB, and thereby also allows traffickers to resume their operations in another location.

Of the 28 municipal codes in our assessment, nine, or just over 30% of municipalities, included this characteristic. These municipalities are Bellbrook, Centerville, Fairborn, Kettering, New Carlisle, Oakwood, Springboro, West Carrollton, and Xenia. For example, to obtain a business license to operate a massage establishment within the city of New Carlisle, section 840.04 of the municipal code requires providing a definition of service offered at the establishment, the location, mailing address and all telephone numbers of the place where the business is to be conducted, the name and residence address of each applicant (including any partners, corporate officers, directors, stockholders own-

ing more than 10%, a corporate address if applicable), the two addresses of the applicant immediately prior to the present address of the applicant, and several other requirements that further clarify the identity of the applicant.

The fourth characteristic is **regulation of entrances and buzzer-controlled front doors**, which is defined as a municipal code's prohibition of aspects of a massage establishment that obscure buyer behavior, such as side-entrances and buzzer-controlled front doors. Oftentimes, IMB owners will use side-door entrances, back-door entrances, or buzzer-controlled front doors as a means of obscuring buyer behavior while visiting the establishment. Because prohibiting such structures deters buyers, this is a critical characteristic of a strong law combating IMBs. For example, Santa Clara County in California, passed an ordinance containing such restrictions. All of the IMBs located in its unincorporated areas shut down within just one year of the ordinance's passage. Of the 28 municipalities in our assessment, none included this characteristic.

The fifth characteristic is **inspections by applicable city departments**, which is defined as a municipal code's inclusion of mandatory requirements for inspections of massage establishments by code enforcers within applicable city departments. It is common that the inside of IMBs display signs of trafficking operations that can be recognized by city officials. For example, the inside of an IMB establishment

may not have services and prices on display in order to obscure buyer behavior. If prices are on display, they may be marked well below the standard market value for massage services elsewhere. Inspectors can also look for signs that workers have been living inside of the establishment, such as beds, toiletries, or other similar items, which is a major sign of trafficking. City officials that are legally allowed to inspect a massage establishment can take note of such signs and report them to law enforcement.

Of the 28 municipalities in our assessment, nine, or just over 30% of municipalities, included this characteristic. These municipalities are New Carlisle, Bellbrook, Fairborn, Xenia, Centerville, Moraine, Oakwood, Springboro, and West Carrollton. For example, SEC 842.08 of Fairborn's municipal code states, "(a) Any of the following individuals may conduct inspections to determine compliance with this section and other applicable state and local laws: (1) A police officer; (2) The Warren County/Montgomery County Health Commissioner or their designee; (3) A building inspector appointed by the City of Springboro; (4) Any other person authorized by the City of Springboro to conduct inspections of a massage services establishment; or (5) A representative of the State Medical Board of Ohio. (b) Inspections shall be conducted at any time. (c) Inspections shall be conducted at least once per year to determine compliance with this section. (d) Permit holders shall be given 10 days from the date of inspection to correct any violations of this section. Permit

holders shall immediately correct any issues found to be in compliance with Section 842.05, Facility Requirements. (Ord. 16-29. Passed 9-15-16.)".

The sixth characteristic is **reference to the ORC Section 4731.15** requiring massage therapist licensing by the state medical board, which is defined as a municipal code's inclusion of the requirement that massage therapists employed by a massage establishment be licensed by the Ohio State Medical Board. Ohio currently allows massage practitioners to practice "relaxation massage" without being licensed by the Ohio State Medical Board. Thus, many illicit massage businesses are dependent on this loophole in order to carry out operations and recruit victims for the businesses that are not required to be licensed.

Of the 28 municipalities in our assessment, seven, or exactly 25% of municipalities, included this characteristic. These municipalities are Bellbrook, Fairborn, Xenia, Centerville, Moraine, Springboro, and West Carrollton. For example, SEC 117.03 of West Carrollton's municipal code requires that permit applications for massage establishments include, "A copy of the license provided by the State Medical Board of Ohio for the owner and/or manager and each person who will practice massage therapy at the massage services establishment."

The seventh, eighth, and ninth of these characteristics refer to stigmatizing language frequently used by municipalities in order to categorize massage establishments within a business regulatory framework.

This language is harmful because it further sexualizes the profession of massage and promotes negative stereotypes about massage therapists and establishments. This contributes to a culture of complacency and normalizes assumptions about IMBs and the illegal activities that occur within them, such as human trafficking. Municipal codes frequently categorize massage establishments or parlors as "sexually oriented businesses", "adult entertainment establishments" or otherwise use language referencing sexual activity or "adult" orientation. Municipal codes may also further contribute to the stigmatization of the profession of massage by regulating the profession in a manner that is not consistent with other professions under the municipal code (Polaris, 2018).

Specifically, the seventh characteristic is **reference to ORC section 2907.39**, which states that any establishment that employs individuals licensed by the state who engage in medically approved and recognized therapy, including massage therapy, are not adult entertainment or sexual encounter establishments. This criteria is defined as a municipal code's inclusion of such a provision which declares that establishments who employ massage therapists that are licensed by the state are not adult entertainment or sexual encounter establishments. This provision of the ORC contributes to de-stigmatization efforts related to the profession of massage.

Municipality Name	Refernce to unlawful advertisement of massage	Regulation of operating Hours	Clarification of business ownership	Regulation of entrances	Inspections	References ORC 4731.15	References ORC 2907.39	Refraining from stigmatizing definitions	Refraining from employee-cente red regulations	Total Criteria Met (out of 9)
Beavercreek	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
Bellbrook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5
Brookville	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Centerville	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7
Clayton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1
Dayton	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0
Eaton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3
Englewood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Enon	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Fairborn	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6
Germantown	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Greenville	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0
Huber Heights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Kettering	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4
Miamisburg	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
Moraine	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
New Carlisle	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
Oakwood	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4
Piqua	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
Riverside	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3
Springboro	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4
Springfield	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2
Tipp City	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
Trotwood	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4
Troy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
Vandalia	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3
West Carrolton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5
Xenia	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5

Figure 16

Of the 28 municipalities in our assessment, 12, or just over 40% of municipalities, included this characteristic. For example, SEC 1123.01 of Trotwood's municipal code states, "An establishment in which a medical practitioner, psychologist, psychiatrist, or similar professional person licensed by the state engages in medically approved and recognized therapy, including, but not limited to, massage therapy, as regulated pursuant to section 4731.15 of the Revised Code, is not an 'adult entertainment establishment/sexual encounter establishment.'"

The eighth characteristic is **refraining from the use of stigmatizing definitions of massage establishments**, including defining massage establishments as "sexually oriented businesses", "adult entertainment establishments", or the use of similar stigmatizing language to define or categorize massage establishments. This is defined as a municipal code's exclusion of massage establishment definitions which further stigmatize the profession of massage therapy. Not using such language is a good practice. Of the 28 municipalities in our assessment, nine, or just over 30% of municipalities did not utilize such language. These municipalities are Bellbrook, Kettering, Xenia, Centerville, Oakwood, Riverside, Trotwood, Eaton, and West Carrollton. For example, Kettering's municipal code includes a definition for the "business of massage," which is simply defined as, "Any establishment having a source of income or compensation derived from the practice of massage as defined in Subsection (a), and which has a

*fixed place of business where any person, firm, association or corporation engages in or carries on any of the activities in Subsection (a).*

By comparison, other municipal codes define massage establishments and businesses in relation to sexual activity. For example, SEC 755.02 of Brookville's municipal code states: "Sexually oriented Business" means an adult arcade, adult bookstore, adult novelty store, adult video store, adult cabaret, adult motion picture theater, adult theater, nude model studio, escort agency, massage parlor, or sexual encounter center." This same code also states, "Massage parlor" means any place where, for any form of consideration or gratuity, massage, alcohol rub, administration of fomentations, electric or magnetic treatments, or any other treatment or manipulation of the human body which occurs as a part of or in connection with 'specified sexual activities' is offered, or where any person providing such treatment, manipulation, or service related thereto, exposes his or her 'specified anatomical areas'."

Finally, the ninth characteristic is **refraining from the use of employee-centered regulations in some municipal codes that further stigmatize the profession of massage**. This is defined as a municipal code's exclusion of employee-centered regulations of massage therapists that further stigmatize the profession in a manner that is not consistent with the regulations of other professions within the municipality. Regulations that focus

on employees instead of the business of massage itself harmfully focus attention on potential victims of human trafficking instead of the perpetrators of illicit activity. SEC 842.02 of Springboro's municipal code is an example of the use of sexually stigmatizing language: "No person that is providing massage services in the City of Springboro shall knowingly do any of the following at, upon or within a massage services establishment or elsewhere: Place his or her hand upon, touch with any part of his or her body, fondle in any manner, or massage the sexual or genital area of any other person..."

Of the 28 municipalities in our assessment, 14, or exactly 50% of municipalities, did not use sexual language that stigmatizes the profession of massage. These municipalities are Brookville, Eaton, Englewood, Enon, Germantown, Huber Heights, Kettering, Piqua, Riverside, Springfield, Tipp City, Trotwood, Troy, and Vandalia.

In conclusion, legislation that regulates massage businesses in the Miami Valley is inconsistent across municipalities. While municipal regulations often differ from city to city, in the case of IMBs this variation enables IMB owners and traffickers to move their operations from a city with strict legislation to a city with lax legislation. If municipalities can make a concerted effort together to strengthen legislation regulating massage businesses across jurisdictions, this could reduce the number of IMBs and reduce exploitation and human rights abuses.

At the same time, what is needed to strengthen legislation regulating IMBs

will vary by municipality depending on law enforcement resources, the size of the municipality, and other similar factors. For those municipalities with limited resources, more regulation might not be effective. Furthermore, it is critical that efforts to strengthen legislation do not cause more harm, particularly by stigmatizing massage businesses or the profession of massage. Any municipality aiming to strengthen legislation to reduce the number of IMBs should utilize a harm-reduction strategy which includes the involvement of legitimate massage therapists and business owners located within the jurisdiction of the municipality.



# DISRUPTING IMBS

A three tiered disruption strategy is needed to reduce and prevent sex and labor exploitation within IMBs across Ohio. IMBs are criminal enterprises. As such, they provide a good or service to meet a customer demand. In the most simple terms, to disrupt IMB networks governments, advocates and service organizations must: a) reduce demand, b) increase the cost of doing business, and/or c) reduce the supply (Figure 17).

Successfully taking action at all three areas of disruption is ideal for a highly effective strategy. To determine the best approach for any local context, open discourse with all involved personnel and partners is best practice.

Borrowing from public health professionals, this strategy attempts to work at all three levels of prevention: primary - preventing harm before it occurs, secondary - reducing the impact of harm that has already occurred, and tertiary - providing ongoing care to mitigate the consequences of harm

(Encyclopedia of Public Health). In other words, it disrupts current criminal activities, works to prevent future activities, and provides for the long-term healing of survivors.

## Reducing Demand

There are two main pressure points to convince buyers to not purchase commercial sex services at IMBs. First, increase the criminal consequences of purchasing. This can be brought about by increasing legal penalties and enforcement. Second, increase the social consequences of purchasing. This involves shifting cultural norms of acceptance or tolerance of this behavior. Together, this increases the costs or risks of engaging in the behavior without a corresponding increase in the benefits or rewards.

These may be accomplished with a program of public education and awareness-raising about the harms of IMBs and a campaign advocating for increased penalties and enforcement



Figure 17

with local officials via attendance at council meetings, email writing, and op-eds.

## Increasing the Cost of Doing Business

Human trafficking is a criminal enterprise with an extremely high-reward to risk ratio (Kara, 2017). To disrupt such an enterprise requires that this equation be changed. Risk can be increased in several ways. Increasing legal penalties and improving law enforcement are good initial steps. Advocating for tougher state law and stricter local ordinances puts pressure on IMB owners and managers. Providing culturally-sensitive human trafficking response and investigation training to law enforcement officers

will improve implementation of laws and increase arrests and, hopefully, convictions. Improved legislation is pending in the Ohio legislature (Senate Bill 55 and House Bill 81 (GA134-2021-2022)) and this report identifies criteria for drafting effective municipal ordinances above. Campaigns raising awareness about these laws and ordinances and advocating for their adoption is a good step to increase business costs of IMBs.

Providing culturally-sensitive, linguistically-appropriate, and trauma-informed services for victim-workers at IMBs is critical to both protect the human rights of the victim-workers and improve their cooperation with law enforcement investigations. Victim-work-

ers often are not English-speakers and are manipulated by fear and cultural norms to actively deny their victimization and not cooperate with law enforcement. Providing linguistically and otherwise appropriate services will help to reduce re-exploitation of victim-workers and improve the odds of successful investigations—both of which increases risks for owners and managers.

Finally, public education and awareness will help to create pressure for adoption of more effective policies and allocation of more resources for anti-IMB operations. Also, an informed public will be able to identify signs of human trafficking at IMBs and make reports to police crime tip lines and anti-human trafficking hotlines.

### Reducing Vulnerabilities

As mentioned above, providing culturally-sensitive, linguistically-appropriate, and trauma-informed services to IMB victim-workers is critically important for protection of their human rights. It also is critical to reach potential victims and vulnerable, at risk populations prior to their exploitation, if possible. Since most victims are recruited prior to their arrival in the state, collaboration with service providers and advocates in New York, Los Angeles, and other areas on anti-IMB recruitment programs and awareness raising in high risk populations would be very beneficial. Awareness education could be delivered to vulnerable groups via linguistically and culturally - appropriate messaging on social media platforms and websites used by those groups, such as

WeChat, or through other channels. Heyrick Research (2019b) recommends working directly with Chinese employment agencies and providing awareness materials to counter IMB recruitment. Ohio-based advocates could research agencies or organizations providing services to at-risk populations in points of entry and reach out to create networks of information sharing and mutual support, including to promote their work or fundraise in support of their efforts.

Victim awareness materials in appropriate languages are available from Polaris, US Department of Health and Human Services, US Department of Homeland Security, and others (see appendix). These resources can be distributed during outreach visits or via media outlets and social media. Advocates should collaborate with trained professionals to develop and distribute awareness materials. Additionally, fundraising, volunteering, and support of agencies conducting outreach and providing other services locally is very important to improving outcomes for victim-workers. Asian American Community Services in Columbus is an example of an Ohio-based organization serving this population (aacsohio.org).

This diagram (Figure 18) pulls together all of these steps into a comprehensive disruption strategy that can be adapted to different communities. We strongly encourage partnering with your local anti-human trafficking coalition, local government officials, and other stakeholders such as massage therapists and trafficking survivors for

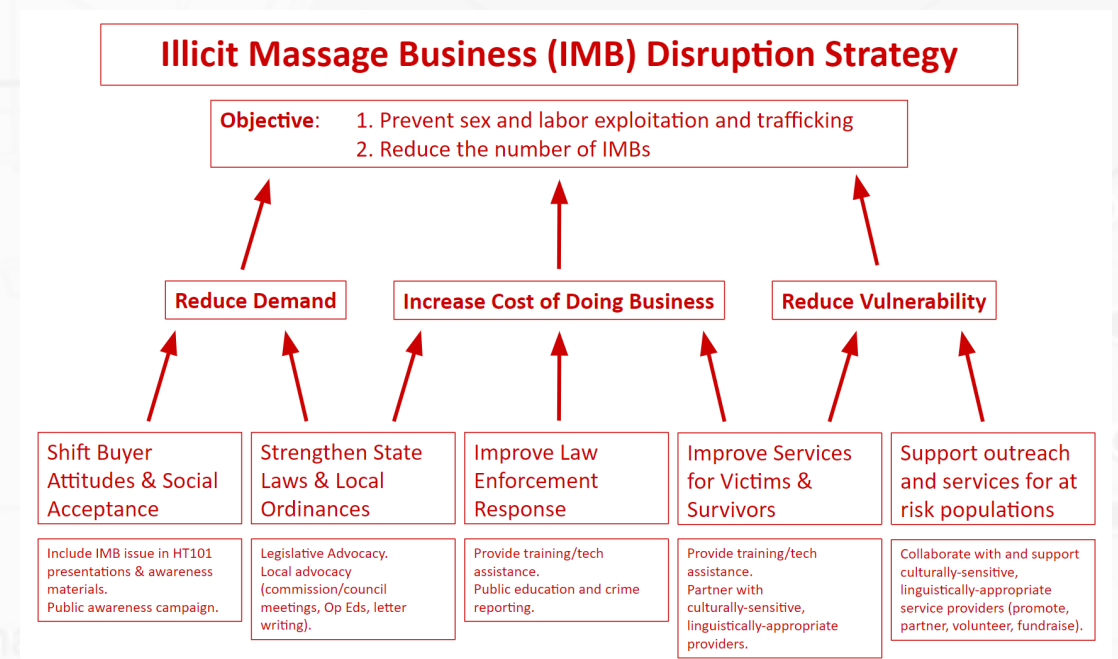


Figure 18 - See appendix for a full size image

the development and implementation of an initiative.

We are at a critical point in time. There is a high level of awareness of human trafficking, racism, and sexual violence and exploitation in the US. National conversations are taking place about racism and racialized violence (including anti-Asian hate crimes) and about gender-based violence and predatory sexual behaviors. Recent research has increased our understanding of how IMBs operate and their scope and scale. Pending legislation in the Ohio state senate and house provide an opportunity to greatly strengthen Ohio's response to IMBs. This is the time to take action.

Our response to IMBs is an anti-human trafficking initiative that has two overarching objectives: 1) to prevent sex and labor exploitation and human trafficking and 2) to reduce the number of IMBs in the Miami Valley

and beyond. Accomplishing these objectives requires a comprehensive, multi-pronged approach aimed at reducing demand for services at IMBs, disrupting and increasing the cost of doing business for IMBs, and reducing the vulnerabilities of people at risk of exploitation in IMBs. The findings of this report are largely targeted towards state and local governments in Ohio who have the responsibility to respect, protect, and promote human rights by strengthening laws aimed to reduce exploitation and trafficking and towards advocacy organizations and activists working in this issue space. There also are implications for other actors such as victim service agencies, law enforcement organizations, and concerned community members.

# APPENDICES

## METHODOLOGY

### Interviews

We conducted a series of interviews and conversations with experts on IMBs who were based in or had experience working on the issue in Ohio. Initial subjects were identified during our background research. Additional subjects were recommended to us during the initial interviews. All subjects were provided with an informed consent statement and were treated in accordance with the ethical principles and code of conduct required by the Institutional Review Board of the institution supporting the study. Seven formal interviews were conducted with law enforcement personnel, researchers, advocates, city government officials, and massage therapists. Multiple informal conversations with various other Ohio-based experts also took place over the past year. Interviews were 50-90 minutes in length and took place via Zoom during March-April 2021. All interviewees are anonymous and are referred to by their role/occupation in the report.

### Ohio Illicit Massage Business Data Mapping

For this section of the report, we reviewed two common massage parlor review sites, Rubmaps.ch and Adultsearch.com, for listings of massage businesses within the state of Ohio indicated by the website and its users as offering commercial sex as of January 2021.

In order to capture the extent and prevalence of these businesses across the state of Ohio, we utilized Google maps in order to create a visual. Upon receiving search results for massage business listings in Ohio from either site, we proceeded to add the address of each listing to our own customized Google map. Each of these addresses are displayed on the map with a red indicator.

While reviewing search results, we noticed a functionality of Rubmaps.ch which indicates older businesses that no longer exist as "closed" on the website. Therefore, it is important to disclose that many of the businesses indicated on the map may be closed now, are operating under a different name, or have moved locations. Our research is thus limited due to the pervasive, yet hidden nature of illicit massage businesses.

### Media Analysis

We conducted a search of news media sources using Nexis Uni, a product of Lexis-Nexis in February, 2021. We used the search string: massage and w/p "Ohio" and w/p (prostitution OR "human trafficking"). This returned 250 results that related to massage and Ohio and either prostitution or human trafficking. These results were manually screened to remove duplicate and irrelevant articles. The articles were then screened and categorized for tone and type. Microsoft Excel was used for quantitative analysis and production of graphs. Unrelated and redundant results were removed from the dataset leaving a total of 134 unique news articles from March 1981 to December 2020.

### Local municipal policy assessment

To conduct an assessment of local municipal codes in the Greater Dayton region, we utilized two code libraries, one published by the American Legal Publishing Corporation and Municode. We reviewed the municipal codes of all municipalities in the six counties Abolition Ohio serves in southwestern Ohio- Clark County, Darke County, Greene County, Miami County, Montgomery County, and Preble County. After removing villages and unincorporated townships from the total list of locations, the final list consisted of 28 municipalities between these six counties.

In order to assess all 28 municipalities, we developed a set of 9 characteristics based on recommendations from the 2018 Polaris report and from local experts and advocates in the anti-human trafficking community. We then reviewed each municipal code for language that explicitly refers to any of the 9 characteristics we identified and took detailed notes on each municipality.

We found some difficulty identifying codified legislation that included any of the 9 characteristics for two of the 28 municipalities- Greenville and Dayton. We contacted these two municipalities in 2020 to confirm that there is no existing legislation regarding illicit massage establishments in either municipal code.

# GLOSSARY

**Happy Ending-** “a massage that starts with the usual full-body rubdown but ends with a sex act, usually a hand job or a blow job” <https://www.dictionary.com/e/slang/happy-ending-massage/>)

**Hobbyist-** “Connoisseurs” of purchasing sex who are repeat customers at illicit massage businesses; also known as “mongers” (Polaris report)

**Human Trafficking-** The use of force, fraud, or coercion to obtain some form of labor or sexual act (<https://www.dhs.gov/blue-campaign/what-human-trafficking>)

**Illicit Massage Business-** Sites of human trafficking operations that front as commercial businesses; also known as massage parlors, erotic massage parlors, Asian massage parlors, or spas. (Polaris report) +

**Johns-** Refers to individuals who purchase or trade something valuable for sexual acts; used to describe the average buyer of commercial sex (<https://sharedhope.org/the-problem/trafficking-terms/>)

**Labor Trafficking-** “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” (TVPA, 2000) - 22 U.S.C. S 7102

**Massage Rating Websites-** Online communities where buyers of sex share information about their experiences at specific illicit massage businesses; Rubmaps.com is the most popular rating website in the US (Polaris Report)

**Outcall Services-** A type of escort service where traffickers deliver victims to a buyer’s hotel room or residence to perform sex acts in exchange for money (Polaris Report).

**Sex Trafficking-** “The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act, in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age” (TVPA, 2000) - 22 U.S.C. S 7102

**Shell Company-** A corporation that exists without any business operations or assets, and that is used to disguise ownership of illegal operations such as illicit massage businesses (Polaris report)

**“Whack-a-Mole” effect-** When law enforcement raids and shuts down an illicit massage business site, only to cause the operations to move and reopen at a different location under a different name. (Polaris report)

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UN Women. (2020). Guidance: addressing emerging human trafficking trends and consequences of the COVID-19 pandemic. Publications. <https://www.unwomen.org/en/digital-library/publications/2020/07/guidance-addressing-emerging-human-trafficking-trends-and-consequences-of-the-covid-19-pandemic#view>

United States Census Bureau. (2019). Income and poverty in the United States: 2019. Publications. <https://www.census.gov/library/publications/2020/demo/p60-270.html>

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## ADDITIONAL RESOURCES

### Downloadable awareness resources in over 20 languages:

National Human Trafficking Hotline. (2021). Downloadable awareness materials. Resources. <https://humantraffickinghotline.org/get-involved/downloadable-resources>

### Downloadable and print awareness materials in several languages:

U.S. Department of Health and Human Services. Office on Trafficking in Persons: An Office of the Administration for Children and Families (2019, December 10). Look beneath the surface public awareness materials. Outreach material <https://www.acf.hhs.gov/otip/outreach-material/lbs-public-awareness-materials>

### Awareness materials in 10 languages:

U.S. Department of Homeland Security. (2021). Document library. Blue Campaign. <https://www.dhs.gov/blue-campaign/library>

### Great article with a lot of interviews and references to research:

Kemsley, T. and Hamilton, B. (2015, April 5). Inside the \$1 billion business of erotic massage parlors. The New York Post <https://nypost.com/2015/04/05/inside-the-1-billion-business-of-erotic-massage-parlors/>

### Investigative Journalism:

Hamilton, B. and Kemsley, T. (2015, April 7). Looking for a happy ending. The Hatch Institute. <https://thehatchinstitute.org/2015/04/07/looking-for-a-happy-ending/>

### Good overview by former Ohio Anti-Human Trafficking Coordinator:

Janis, E.R. (2018). Illicit massage businesses: The pervasive, insidious form of trafficking happening across the United States. Trafficking Matters. <https://www.traffickingmatters.com/illicit-massage-businesses-the-pervasive-insidious-form-of-trafficking-happening-across-the-united-states/>

### A list of detailed research notes on IMBs (Note: Heyrick Research uses term Illicit Massage Industry- IMI)

Heyrick Research. (2020). <https://www.heyrickresearch.org/research>

### A look at how corporate secrecy (i.e. "shell corporations") facilitates IMBs

Polaris Project. (2018, April 1). Hidden in plain sight: How corporate secrecy facilitates human trafficking in illicit massage parlors. Resources. <https://polaris-project.org/resources/hidden-in-plain-sight-how-corporate-secrecy-facilitates-human-trafficking-in-illicit-massage-parlors/>

# Illicit Massage Business (IMB) Disruption Strategy

**Objective:** 1. Prevent sex and labor exploitation and trafficking  
2. Reduce the number of IMBs

## Reduce Demand

Shift Buyer Attitudes & Social Acceptance

Include IMB issue in HT101 presentations & awareness materials.  
Public awareness campaign.

Strengthen State Laws & Local Ordinances

Legislative Advocacy.  
Local advocacy (commission/council meetings, Op Eds, letter writing).

## Increase Cost of Doing Business

Improve Law Enforcement Response

Provide training/tech assistance.  
Public education and crime reporting.

Improve Services for Victims & Survivors

Provide training/tech assistance.  
Partner with culturally-sensitive, linguistically-appropriate providers.

## Reduce Vulnerability

Support outreach and services for at risk populations

Collaborate with and support culturally-sensitive, linguistically-appropriate service providers (promote, partner, volunteer, fundraise).





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