Human Trafficking in Illicit Massage Businesses

Executive Summary
Commonly called massage parlors, illicit massage businesses (IMBs) that front for commercial sex operations have been ubiquitous in the American landscape for decades. While some keep a low profile, many others blatantly advertise “Asian gals,” or bear sexualized names like “Good Girl Spa.”

In 2017, Polaris analyzed more than 32,000 cases of human trafficking from the National Human Trafficking Hotline (NHTH) and developed a classification system that identifies 25 distinct types of human trafficking in the United States.

Trafficking related to massage parlors accounted for 2,949 cases — second in prevalence only to trafficking in escort services.

However, the data from the NHTH almost certainly does not represent anything close to the scope of the problem. By its very nature, human trafficking is a difficult, if not impossible, crime to quantify with precision. Traffickers operate in the shadows, and the tools they use to exploit victims are such that the victims themselves often do not know that what is happening to them is against the law.

There may be women who choose to sell sex either along with or under the guise of massage therapy, but evidence suggests that many of the thousands of women engaging in commercial sex in massage parlors are victims of human trafficking.

In this report, Polaris details how this extremely widespread and lucrative industry operates on the edges of legality, while hiding massive criminal enterprises behind its doors.

↑ Massage parlor in mall, McAllen, TX

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1 While there have been reports of men trafficked in massage parlors, often also in the case of serving male clientele, these cases are in the minority, and information on them is currently anecdotal, based on a handful of press pieces and service provider case studies.”
There are more than 9,000 illicit massage businesses currently open for business in America, hiding in plain sight in strip malls, dotting the sides of highways, and on busy commercial strips in every state. These are very specific types of establishments that have unique identifying features.

Our analysis suggests that total annual revenue of illicit massage businesses in the United States hovers around $2.5 billion annually.

The women recruited into massage parlor trafficking mostly:

- Recently arrived from China or South Korea
- Carry debts or are otherwise under extreme financial pressure
- Speak little or no English
- Have no more than a high school education
- Are in their mid 30s to late 50s
- Are mothers
Indicators that a massage parlor is engaging in commercial sex and potential human (sex or labor) trafficking include:

- Prices significantly below market-level (e.g. $40 for a one-hour massage in a city where $80 is the norm)
- Serves primarily or only male clientele
- Locked front door, customers can only enter if buzzed in, or enter through back or side doors that are more discreet
- Windows are covered so passersby cannot see into the establishment
- Women appear to be living in the establishment

Extremely low prices in Los Angeles

Discreet rear entrance and parking in Tampa, Fla

Security-camera surveilled, buzzer-controlled entrance in Philadelphia
Not all commercial sex venues are human trafficking sites — even if they involve massage. To be considered human trafficking in any venue, a situation must include one of the following:

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

Cultural shame is so pervasive among survivors of massage parlor trafficking that few will admit to having participated in commercial sex at all, referring at most to “bad massage.” In every case Polaris reviewed from the National Human Trafficking Hotline, as well as in focus groups and extensive conversations and case studies from law enforcement and service providers, we found at least one element of labor trafficking including the following examples of fraud and coercion (force is rarely used in massage parlor trafficking):

**Fraud:**
- Recruitment advertisements misrepresent pay or hide the sexual nature of the business.
- Women are told that all massage is sexual in the United States.
- Women are told that police in the United States are corrupt, in the “pockets” of the traffickers, and will not help them.
- U.S. labor laws and protections are misrepresented, and women are paid less than minimum wage or no wage at all.
- Women work on-call or seven days a week or otherwise in situations that violate American labor law, and are told that this is normal and legal in the United States.

**Coercion:**
- Victims are told they will be arrested for prostitution or deported by immigration officials if they try to leave the business.
- Other threats include telling families and communities in home countries that they have shamed them by having sex with thousands of men.
- Traffickers control passports and money, often not allowing women to have any cash at all.
- Fees are charged to the women for everything from rent — although they often live in the massage parlors — to food, to “fines” for breaking the “rules” of the business. This puts women, many of whom already owe money for expenses related to coming to the United States, deeply in debt to traffickers.
Illicit massage businesses attract a particularly risk-averse subset of commercial sex buyers—meaning that without massage parlors, they likely would not buy sex.

Buyers find IMBs via word-of-mouth or online, where they advertise in the “massage” or “therapeutic” sections of classified ad sites like Backpage.com and Craigslist.

A unique feature of IMB business models is the use of very public review boards—websites such as rubmaps.com, usasexguide.com, MPRreviews.com, aampmaps.com, and spahunters.com. On these sites, buyers share very explicit information including details of which women provide which sex acts, how much to tip, reviews of their experiences, and ratings of the physical attributes of the women.

The Advanced Search function on the RubMaps website.²

Rubmaps.com, the most popular of the national buyer review boards by web traffic, receives more than 325,000 estimated unique visitors per month. It catalogues more than 7,200 open and active illicit massage businesses around the country, allowing paid subscribers to search by state and city.³
While it may look like a standalone business, the average IMB is part of a larger network of illicit businesses.

- The average IMB connects to at least one other IMB as well as non-massage venues such as nail salons, restaurants, grocery stores, and dry cleaners.
- These connections are utilized to move women from states that are ports of entry, such as New York and California, to IMBs around the country.
- Overwhelmingly, these connected businesses are used to launder money earned from the IMB.
- Networks generally include shell companies that obscure identities of the real trafficking profiteers.
In theory, because organized criminal activity, especially around commercial sex, is illegal, shutting down massage parlor trafficking should be a matter of simply enforcing existing criminal laws against traffickers, while ensuring victims are connected with services. In practice, of course, law enforcement does not have the resources to investigate and prosecute thousands of organized human trafficking networks at any given time, and keep doing it, because traffickers shut down in one venue can simply reopen in another part of the network.

In reality, human trafficking is a business. Ending human trafficking, in massage parlors and all other venues, must be seen as a profit versus risk equation.

Creating legal and regulatory frameworks

One effective way to shut down massage parlor trafficking is to enact and enforce civil laws regulating massage businesses. Just like health inspectors can shut down restaurants for violating safety rules, local government agencies should be able to fine or close massage businesses that violate civil laws. These laws must be carefully crafted to make it more risky for customers to visit massage parlors and therefore less lucrative for traffickers to run them.
Good laws:

• Are the same across state, county and city jurisdictions, so traffickers cannot pick up and move to a nearby but “friendlier” location,

• Regulate business operations and ownership — including physical space, hours of operation and other business practices, rather than solely regulating massage therapists and holding them responsible for things like attire and licensing, while ignoring the traffickers who own and profit from the businesses, and

• Regulate massage businesses as health or beauty establishments, not as sexually-oriented businesses on par with adult bookstores and strip clubs.

Current state of massage laws

While 46 states⁴ have some regulation of or industry standards for massage therapists, or state law acknowledging the massage profession, the key to ending trafficking is strong laws regulating the business operations.

• Of the 46 states that have laws mentioning massage:
  – 33 regulate only massage therapists and other employees
  – 12 regulate massage businesses operations (one of which regulates massage as a sexually-oriented business — akin to strip clubs and adult bookstores)
  – 1 delegates the power to regulate massage businesses to cities and counties

• Even good state laws are rarely effectively enforced because the vast majority of business regulation/code enforcement is done at the local level. That means code inspectors from counties will enforce county laws, not state laws, and so on.
  – only 12 percent of counties regulate massage business operations
  – only 12 percent of cities regulate massage business operations

↑ Spa in Chinatown, Flushing, NY
A few elements that strong laws have in common:

• **Regulating hours of operation.** San Francisco city has used, among other things, a provision on hours of operation to successfully close more than 100 massage parlors in two years.

• **Prohibiting structures like buzzer-controlled front doors and back-door entrances that obscure buyer behavior.** Santa Clara County’s law, which includes provisions around entrances, was used to close down all massage parlors in its unincorporated areas within one year.

• **Regulating massage businesses with other commercial licensed businesses.** Within the past 10 years, Delaware has gone from regulating massage establishments as “sexually-oriented businesses” to having a robust, statewide law categorizing massage businesses as health businesses.

• **Working with local massage therapists.** North Carolina passed a new statewide law on massage establishments in July 2017. This law was passed with collaboration by Polaris, North Carolina’s American Massage Therapy Association (AMTA) chapter, and members of the Human Trafficking Task Force to ensure strong provisions against traffickers while protecting massage therapists. This kind of collaboration, both in the original passage of the law and in the aftermath to monitor and make changes accordingly, is the baseline for ensuring laws are written to succeed and amended as necessary as traffickers adapt to changing conditions.

Improving law enforcement response to trafficking

While law enforcement cannot be held solely responsible for ending human trafficking in IMBs, improving law enforcement approaches is a key piece of the puzzle.

• **End the whack-a-mole approach of doing “stings” at IMBs that result in women arrested for prostitution, but traffickers going free.**

• **Replace undercover stings with “demand” stings, targeting sex buyers who visit IMBs.**

• **Launch organized crime investigations into trafficking networks.**

• **Create systems to investigate trafficking across jurisdictions.**

Other systems changes to shut down massage parlor trafficking

• **Exposing anonymous shell companies.** Shell companies are a staple of criminal enterprises seeking to disguise who really owns and therefore benefits from a company. Both state and federal law should require businesses to register official operators and primary owners (beneficial owner, partner, etc.) both of which should be required to provide a valid phone number and address.

• **Vetting on sites like Yelp and Groupon.** Allowing IMBs to pretend to be legitimate businesses on these sites perpetuates buyers’ comfort with spending their money there and strengthens the fiction that these are legitimate businesses.

• **Taking responsibility as commercial landlords.** The signs are clear. Landlords can educate themselves about IMBs and choose to keep them off their property.

• **Reframing media coverage.** News stories about IMBs generally focus on “busts,” and stories often identify and expose potential victims arrested on prostitution charges, as opposed to the traffickers who are the real perpetrators.

• **Offering women in IMBs empowering options for change.** Instead of being arrested in IMBs, women should be connected to a robust network of service providers who can offer pathways to economic empowerment such as job training and placement services.
Ultimately, ending trafficking in massage parlors begins with understanding that this is a universal problem and that we are all part of the solution. That does not mean that communities should gather together to protest outside individual massage parlors or otherwise look for quick-fix ways to shut down businesses in their neighborhoods. Rather, we can all participate in creating lasting system and cultural change that will increase the risk and decrease the reward for human trafficking in illicit massage businesses. Steps include:

- **Advocate for sound laws regulating massage businesses at all levels of local government.** Let your city council member or representative know that you want your city or state to pursue a victim-centered, exploiter-focused approach to closing loopholes that human traffickers exploit.

- **Call out the press for exposing victims.** When you see an article reporting on a “prostitution arrest” at a massage parlor, and it shares the photos, names, ages, or any other identifying information of potential victims, write a letter to the editor asking the newspaper to recognize that human trafficking is common in massage parlors and that the news outlet should adopt a policy that protects potential victim identities.

- **Share what you know about massage parlor trafficking and shut down “happy endings” jokes online, in the media and in your community.** We are all responsible for shifting our culture to one that treats exploitation and human trafficking as a serious problem, not a joke.

For more information and to view/download the full report visit: [https://polarisproject.org/massage-parlor-trafficking](https://polarisproject.org/massage-parlor-trafficking)