

Defend Dignity
**Guide for Churches to End Sexual
Exploitation in Canadian Body Rub
Centres**



DefendDignity

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Table of Contents

1.0	Background Information.....	3
2.0	Awareness and Education.....	4
2.1	Terms and Definitions.....	4
2.2	City’s Approaches to Body Rub Centres.....	4
2.2.1	Licensing Bylaws.....	4
2.2.2	Zoning.....	6
2.2.3	Banning.....	11
3.0	Advocacy.....	14
3.1	Police Service.....	14
3.2	City Council.....	16
3.3	How to Get Various Other People Groups Involved.....	18
3.3.1	Youth.....	18
3.3.2	Churches.....	19
3.3.3	Survivors.....	19
3.3.4	Lawyers.....	19
3.3.5	Media.....	20
3.3.6	Social Media.....	20
3.3.7	Retired or Ex-Police.....	21
3.3.8	Other Advocacy Groups.....	21
3.3.9	General Public.....	21
3.4	Further Advocacy Tips.....	22
4.0	Aid to Women in or Exiting Body Rub Centres.....	25
	Appendix A – Licensing Bylaws.....	28
	Appendix B – Sample Community Survey – Regina.....	38
	Appendix C – Sample Letter to Police Regarding PCEPA Enforcement.....	40
	Appendix D – Sample Petition.....	44
	Appendix E – Sample Form Letter.....	46

1.0 Background Information

In cities across Canada, there are businesses that are actually brothels, where men go to buy sex. The church's response can take many avenues including education and awareness, advocacy to our elected officials, working to decrease demand, and helping women.

In 2014, Canada's laws around prostitution changed. In December 2014 the Protection of Communities and Exploited Persons Act (PCEPA) was passed. "Our new law treats prostitution as fostering demand for sexual exploitation, views prostitution as a dangerous and exploitative practice and is harmful to those involved (disproportionately women and girls), communities and society. "
<https://www.edmontonpolice.ca/CommunityPolicing/FamilyProtection/SexTrade/LegalitiesofSexTrade>

With this new view that prostitution is a form of sexual exploitation, the selling of sex is legal, but the purchasing of sex is illegal in all circumstances. The goal of our new law is to reduce the incidence of prostitution with a view to abolish it, to protect those who sell their own sexual services, protect communities from the harms of prostitution and to denounce any third party profiteering, especially in commercial contexts such as strip clubs, massage parlours and escort agencies.

Other offences associated with the new law are:

1. Receiving financial benefit from the buying of sex.
2. Procuring or recruiting a person to offer sexual services.
3. Exercising control, direction or influence over the movements of a person to facilitate a purchasing offence.
4. Advertising an offer to provide sexual services that are not from the sellers.
5. Communication for the purpose of selling sexual services in public places close to school grounds, playgrounds or daycares. This is illegal for both the buyer and seller of sexual services.

The people breaking the federal law are: those purchasing sex in body rub centres, those advertising and recruiting the sexual services of others, and those receiving financial benefit such as the body rub centre owners who do not sell their own sexual services.

The Christian and Missionary Alliance is committed to abolishing prostitution, and you can be a part of this endeavor through:

1. Raising awareness and public education about the reality of sexual exploitation in body rub centres.
 - a. This video was created to dispel the myths around body rub centres:
<https://www.youtube.com/watch?v=B5rZon5hgwE&t>

2. Advocating for stronger legal and social deterrents to eliminate the demand for sex and thereby the selling of sexual services.
3. Aiding the women to exit prostitution from body rub centres through the Survivor Support Fund of Defend Dignity. <https://defenddignity.ca/survivor-support-fund/>

2.0 Awareness and Education

Apart from the legalities of prostitution, it is important to understand the scope of the problem. Items to consider are:

2.1 Terms and Definitions

These brothels can go by various names in different cities. Some examples include Body Rub Centres (Edmonton), “Rub and Tugs” (Vancouver), Body Rub Parlours (Toronto, Regina), Holistic Spas or Centres (Toronto and area), or Massage Parlours. The formal definition of this business in Edmonton, is “any premises or any part thereof where members of the general public attend, are invited to attend, or through which they may arrange an appointment to receive the physical external manipulation of the soft tissues of the human body for a fee, including any manipulation of an adult or erotic nature, but not including Health Enhancement Centres.”¹ However, Edmonton’s body rub task force document states: “The City of Edmonton licenses body rub centres within a strict definition that does not include the sale of sexual services.”² However, police, City Council and buyers know that the body rub centres are offering sexual services and turn a blind eye to the illegality of sex buying.

2.2 City’s Approaches to Body Rub Centres

There are generally four methods cities use to regulate body rub centres, namely:

1. Licensing bylaws
2. Zoning
3. Banning
4. No regulation

2.2.1 Licensing Bylaws

Bylaws are used to regulate body rub centres to provide a set of qualifications or rules that need to be followed to operate. In different Canadian cities, some bylaws

¹ <https://www.edmonton.ca/documents/Bylaws/C13138.pdf> (page 38 of 47)

²

<http://sirepub.edmonton.ca/sirepub/cache/2/pdhr33wygvbtv3lslhtrmztz/43502109012020010948317.PDF> (Page 4)

are very detailed, and some are fairly basic and could be compared to a glorified business license. Depending on the approach used in each city, there are generally two approaches used with licensing:

1. Harm Reduction: licensing is used to allow the police to obtain information about the owners/operators/workers to assess problems such as human trafficking, underage workers, etc. and to gather intelligence. The bylaws are written with the purpose of ensuring a degree of safety to the workers. However, as long as the bylaws are followed, the police and city will generally allow the body rub centres to operate.
2. Tools to Stop Operations: the same harm reduction principles are also applied, but there is another goal to use the bylaws as the tools/reason to audit/raid the body rub centres, with the goal of shutting them down. This is done by creating fines for every infraction, with the goal of trying to make it unfeasible for the body rub centres to operate economically, or to remove their license due to too many infractions. If the bylaws are written in a way to be quite detailed and onerous, this may also prevent body rub centres from operating since they do not want to follow such strict bylaws.

Some cities, while they do have fines for bylaw infractions (generally to encourage compliance), still operate under a type of harm reduction model, and don't really have an end goal of trying to shut them down. It all depends on the city's/police direction or beliefs on this matter.

There are different pros and cons to licensing such as:

Pros

- Provides a degree of improvement by incorporating health and safety regulations.
- Provides the city and police with information on who is operating and working in the body rub centres, and their background.
- Can be used as the tool to allow for city official/police entry into the establishment, and enforce fines for infractions.

Cons

- It normalizes sexual exploitation by giving the impression that as long as they are licensed, that means everything is ok, and nothing wrong or illegal is happening.
- It can increase the amount of body rub centres operating since it is now just a "normal licensed business". The centres are also able to operate in full view of the public. This increased supply, and increased visibility therefore will

- increase the number of customers that attend. This creates more sexual exploitation problems.
- The main safety problems occur indoors with the customers, or with any traffickers/pimps. Certain regulations can sometimes only provide an appearance of increased safety, but it is difficult to regulate and prevent the main safety concerns.
 - Increased crime in the area where the body rub centres are located (i.e. “Broken Window Effect”)³.
 - Reduces real estate value and desirability for operating/living in the same area for neighbouring businesses or residents.
 - Depending on the circumstances, it can create a higher tax dollar demand, and police/city enforcement requirement due to the higher amount of centres operating.
 - Allows illegal activity to occur (i.e. customers purchasing sex, owners making money, owners advertising sexual services of others).
 - Some sex workers complain about the high licensing fees, and basically say the city is turning a blind eye to the illegal nature of the business and are acting like a pimp (i.e. taking money from them for performing prostitution).

Many police departments, while they know illegal activity is occurring in the body rub centres, find it very difficult to raid them and find enough evidence for criminal charges. The reason for this is because it is legal for the workers to sell sex, but it is only illegal for the customers to buy sex and for owners to be profiting from it. The workers generally do not want to divulge any information about the customers, and usually will not admit to there being owners, pimps, or traffickers involved due to manipulation or threats made to them if the workers admit what is happening.

However, one clear problem with the legality of licensing is the decision to license owners. The involvement of owners in body rub centres is clearly illegal as per PCEPA, and therefore cities should never license clear and blatant illegal activity. There is not a single other illegal activity that is licensed in Canada like this, and therefore prostitution should not receive a green light with a blind eye being turned.

If licensing is used, there should be a clearly written rule that if an owner applies for a license, if false information is provided about owners during the application, or if an owner is found to be involved later on, that this will be automatic grounds for removing the license, a hefty fine is administered, and they cannot reapply. A worker applying for a license should also have to sign a declaration stating that they are not working with an owner. While this is not a failsafe method to remove the involvement of the owners, it would provide caution to those that are applying, and some owners would not open a body rub centre in that city due to these restrictions. By implementing this step, it also shows that the city and police are properly following the law, and not licensing something that is known to be illegal. It should

³ <https://www.britannica.com/topic/broken-windows-theory>

be noted that there are no known cities in Canada that have implemented this restriction on licensing owners yet.

If licensing is the direction a city is taking, Freedom Catalyst Regina has researched licensing bylaws from many cities across Canada, and has documented what they believe to be the best options (summary wording only). These bylaws can be seen in Appendix A.

The body rub centres in Edmonton have several bylaws surrounding them, including but not limited to:

- Having on-site management at all times so there is more than 1 person working at a time,
- Regular health and safety inspections,
- Operating between 7:00 am and 11:00 pm only,
- Restricting them from 100 m of a sensitive use area such as a school, daycare or park.

Despite licensing and a harm reduction model, there is still violence in Edmonton body rub centres. This recent Defend Dignity video “Survivors of Body Rub Parlours” brings awareness to the myths that City Councils or citizens can believe about the body rub centres and then exposes the truth from women who have survived working in them:

<https://www.youtube.com/watch?v=B5rZon5hgwE>

In Edmonton the body rub centres have been licensed for over 25 years. However, in early 2014 a body rub task force was formed to identify problems and possible solutions. 26 recommendations were given as a harm reduction strategy despite federal laws changing and making it illegal to purchase sex in the body rub centres. These new city bylaws formalized the licensing approach.

In Edmonton, there are presently 32 licensed body rub centres with 322 licensed body rub practitioners. There is no cost for practitioners to be licensed, but they have to attend an in-person information session yearly on their rights, laws, health information, etc. This information session run by CEASE (Centre to End All Sexual Exploitation) happens every 2 weeks. Despite the City of Edmonton stating there is a 99% compliance rate of body rub practitioners being licensed, there has been an increase in health enhancement massage centres suspected of acting as body rub centres. This has led to confusion in the public eye with an increased risk of sexual violence to Health Enhancement Massage Therapists. (Ms. Kasur, President of Transitional Council for College of Massage Therapists of AB at City Council Meeting, Sept 2019.)

2.2.2 Zoning

Zoning is another method cities use to regulate body rub centres. Zoning is used to allow them to operate only in certain areas (i.e. industrial zones, commercial zones, etc.), as well as to impose restrictions on operating within a certain distance from locations that are more sensitive in nature, or where there are a larger amount of children/families. These separation distances can typically range from 0-1000 m. Some of the more common things body rub centres have separation distances from include parks, schools, residential zones, churches, daycares, and other body rub centres.

Table 1 has been put together to show some of the different separation distances and zoning methods used in various Canadian cities. A “colour description” is included in the bottom of the table to differentiate methods. The green cities restrict body rub centres to operate only in industrial zones, while the grey cities allow them to operate in commercial zones. Restricting them to only operate in industrial zones is generally seen as more beneficial than operating in commercial zones for the same reasons already listed in the licensing section (Section 2.2.1).

The blue cities use various zoning methods to essentially ban the body rub centres from their city. The orange cities have very long separation distances, that it essentially restricts the body rub centres from operating in the majority of the city. Further details on these two options are provided below.

Using the cities in Table 1 alone, roughly half (13 of 27) cities use various methods to strongly restrict (or essentially ban) body rub centres. This includes Halifax and London (explained below). Richmond Hill licenses body rub centres, but within the bylaw, it states sexual activity is not permitted. This in theory essentially restricts body rub centres from operating, but they could still operate under the guise of not providing sexual services but still provide it. This would require bylaw officers or police performing a sting to shut it down. As a result, Richmond Hill was not included in the 13 cities. Richmond Hill does have bylaw officers actively working to shut down non-compliant body rub centres at the time of this writing.

City	Restriction Distance	Restricted From	Allowed in Industrial Zone Only?	Further Details on Where Allowed to Operate
Surrey, BC	N/A	N/A	No	Allowed In: "Community Commercial" zones only
Burnaby, BC	N/A	N/A	No	Allowed In: Commercial zones only (a bit unclear)
Langley, BC	N/A	N/A	No	Allowed In: Only one commercial zone and it is a shopping mall. They allowed them to be zoned in this area only due to legal counsel suggesting not restricting fully, but just putting in an area where it was known where

				mall management would not allow them to operate.
Chilliwack, BC	1000 m	School	No	N/A
Abbotsford, BC	N/A	N/A	Restricted Completely	A bit confusing - it is not defined in the definitions (only strip clubs are defined). However through discussions with senior bylaw officers, it was stated personal service establishments of a sexual nature are not allowed.
Kamloops, BC	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only)
Maple Ridge, BC	N/A	N/A	No	Allowed In: "Service Commercial" zones only
Richmond, BC	N/A	N/A	No	Allowed In: Commercial Zones only
Coquitlam, BC	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only). A couple parlours were grandfathered in though.
Calgary, AB	300 m	Other parlour	No	Restricted: home-based and mobile services Allowed In: "Retail and Consumer Service" zones only
Edmonton, AB	100 m	School, park, child care centre, temporary shelter, medical centre	No	Restricted: Residential zones
Regina, SK	182.88 m	School, church, park, daycare, other parlour, recreational facilities, community centres, residential zone	Yes	Allowed In: Industrial zones only
Saskatoon, SK	160 m	Other parlour, adult entertainment venue, residential use, school, park, recreational facility	Yes	Restricted: Home-based (however home-based is allowed only if doing out calls) Allowed In: Industrial zones only
Estevan, SK	1000 m	School, daycare, playground, park, other parlour	No	Restricted: not allowed in a dwelling unit
Prince Albert, SK	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only)
Winnipeg	N/A	N/A	No	Allowed In: certain Downtown zones only (not allowed in Downtown zones primarily used for residential, or public use/enjoyment)
Dauphin, MB	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only)

Steinbach, MB	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only)
Toronto, ON (Holistic Centres)	N/A	N/A	No	Allowed In: Commercial Residential zones
Toronto, ON (Body Rub Parlour)	100 m	Residential zone, other parlour	Yes	Allowed In: Employment Industrial zones only
	500 m	School, place of worship, adult entertainment business		
Richmond Hill	500 m	School, church, daycare, residential zone	Yes	Restricted: bylaw states "no person shall provide in a body-rub parlour any services designed to appeal to erotic or sexual appetites or inclinations"
Hamilton	500 m	Residential zone	Yes	Allowed in: Industrial zones only
Pickering	N/A	N/A	Yes	Allowed In: Industrial zones only
London	100 m	School, church, daycare, residential zone	No	Allowed in: commercial zones. Bylaws restrict them to 6 specific buildings only (they were grandfathered in). New locations can be requested if desired.
Laval	30 m	School, daycare, boarding house, etc.	Yes	Restricted: maximum of 5 parlours allowed in 250 m ² area Allowed In: some Industrial zones only
Halifax	91.4 m	School, library, park, playground, recreational facility, church, other parlour, residential zone	Unknown	Somewhat unclear: adult entertainment is limited to one zone (C-6), but maps cannot be found showing any C-6 zones. Through discussions with a bylaw officer, they were not aware where any C-6 zones existed. He said they are in the process of modifying their zoning areas. Restricted: home based
Colchester, NS	500 m	School, daycare, park, playground, trail, monument, community/rec centre, recreational facilities, business, restaurant, motel, bed and breakfast, professional office, medical clinic, hospital, care home, public/government building, church, library, building used for emergency/protective services, adult	No	There is no way they could ever operate based on the amount of restrictions

		entertainment establishment, dwelling unit		
Fredericton	N/A	N/A	Restricted Completely	Restricted: Fully restricted from operating in all areas (by use of zoning bylaw restriction only)

Colour Code:
Blue: zoning bylaws define body rub parlours, but in turn then do not permit them in any zone, effectively preventing them from operating in any zone. Or they outright ban them in the bylaw.
Orange: restriction distances are very high, and therefore body rub parlours are essentially not able to operate
Green: body rub parlours restricted to industrial zones
Grey: body rub parlours allowed in commercial zones
Red: general miscellaneous restrictions

Table 1 – Zoning Bylaw Summary for Multiple Canadian Cities

Zoning Methods to Restrict Body Rub Centres (Blue Cities)

There are generally three methods cities use to restrict body rub parlours from operating in a city.

1. Body rub parlours are defined in the bylaws, but they are not listed as allowed in any zone. Sometimes they are also not listed as restricted in any zone either. By doing this, this usually allows body rub centres to apply for special permission to open in a zone if they so desire. However, by not outright zoning them to a specific area, it generally gives the impression that they are not welcome or desired in the city, and therefore many body rub centres would not bother applying. This is a method that cities use to protect themselves from legal backlash, since they are not outright trying to ban something, but they are giving a strong indication they are not desired in the city.
2. It is specified very clearly in the zoning bylaws that body rub centres are not allowed in any area of the city. The two cities in Table 1 that use this method are Steinbach and Dauphin, Manitoba.
3. Body rub centres are restricted to operate in an area where it is known the building owner will likely not approve it. For example, Langley, BC only zones body rub centres in their shopping mall since they know the mall management will not approve one to operate. Through discussions with a Langley bylaw officer, they did this at the advice of their legal counsel to make it appear that they were not fully restricting it.

Halifax is another example that restricts body rub centres to a specific numbered zone, but this zone is not found on any map. During discussions with a Halifax

bylaw officer, he was not able to show where these zones exist. However, the maps are detailed, and there are a large number of maps – so these zones possibly exist and just couldn't be found during the assessment of the maps. The bylaws officer said Halifax is in the middle of changing their zoning maps and bylaws.

London, ON is another example that, while body rub centres are allowed in commercial zones, that is only because they are grandfathered in when the bylaws were implemented. Note: if businesses are operating in infringement of a new bylaw before it is implemented, they legally need to be grandfathered in. However, instead of London allowing body rub centres to operate anywhere in commercial zones, they restricted them to only operate in the 6 buildings they were currently operating in. New locations can be requested in London, but they would have to comply with specific requirements.

Long Separation Distances to Restrict Body Rub Centres (Orange Cities)

Certain cities also implement long separation distances from sensitive areas as a means to restrict body rub centres from their city. For example, Estevan, SK has a 1000 m restriction from schools, parks, daycares and other body rub centres, and Chilliwack, BC uses a same separation distance from schools. Assessing these cities using google maps, this effectively leaves no (or very little) areas where body rub centres could operate. Figure 1 shows an example of restricted areas for Estevan.

Colchester, NS is another city that has 500 m separation distances, but they include a large number of different sensitive areas that other cities do not include. For example, Colchester even includes areas such as hotels, restaurants, monuments, trails, professional offices, etc. which would significantly restrict body rub centres from operating.

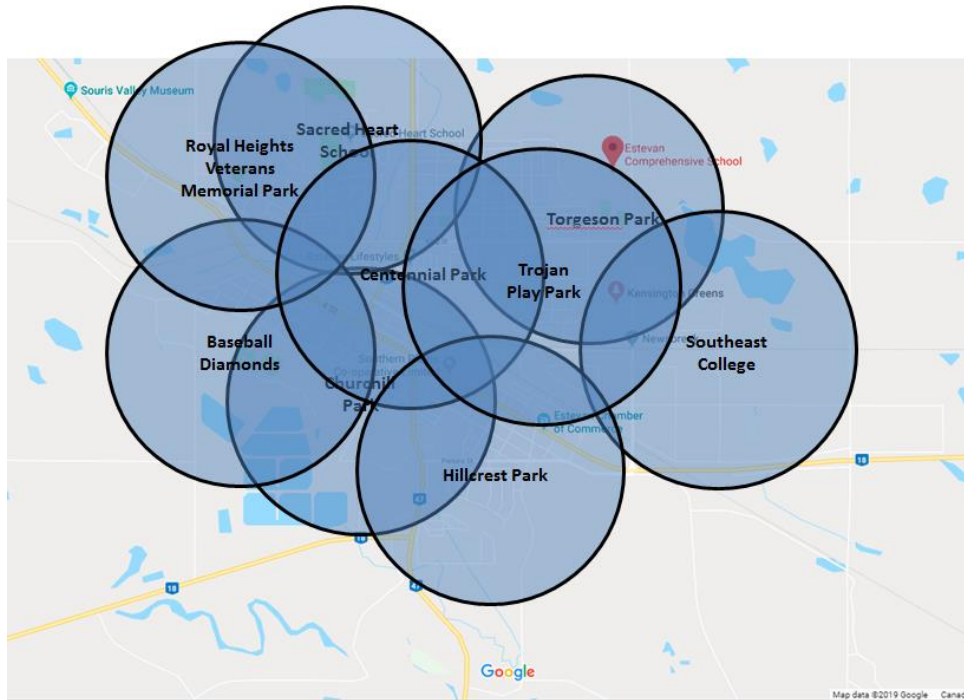


Figure 1 – Estevan, SK Body Rub Centre 1000 m Restriction From Parks and Schools

2.2.3 Banning

There are only two cities that are known to have implemented bans on body rub centres using very clear and outright wording – Steinbach, MB and Dauphin, MB. However, this ban is stated in the zoning bylaws, and there are no other fines implemented or other tools available to enforce the ban if a body rub centre does open.

Recently Regina, SK assessed implementing a ban in 2019. The following is a summary of what happened:

Regina was assessing how they should better regulate body rub centres. This was sparked from a 2015 City Council meeting where Councillors voted on whether a strip club should be allowed to open in the industrial area. Regina had a zoning bylaw stating strip clubs and body rub centres were “discretionary” in the industrial area (which means every application has to go through Council to be voted on). Through this process, the Regina public really rallied together and sent a large number of emails, and phone calls stating they did not want the strip club to be allowed. During the final Council meeting, there were hundreds of people in attendance (and many youth), to the point where they had to have an overflow room to accommodate everybody. Due to this public engagement, and due to the fact that Council agreed there were no good restrictions/tools/licensing implemented to better assess things like human trafficking potential, all of the Councillors except for

one voted against allowing the strip club to open.

During this time, the public was also talking about the large number of body rub centres in Regina as well. These body rub centres were also zoned to be “discretionary” in the industrial area, but the high majority of them were operating in commercial/residential zones, and none of them had ever applied to receive approval to operate. Regina also has 183 m (one block) separation distances from schools, parks, etc. and the high majority of body rub centres also infringed on this requirement.

Due to the public outcry at the strip club meeting, Regina Council said that they would also look at how to effectively deal with this problem. Four years later, in 2019, Regina Administration came out with recommendations on how to implement regulations. In summary they essentially recommended implementing licensing bylaws similar to Edmonton (harm reduction), incorporating environmental controls, and allowing them to operate in the same places where the majority of the body rub centres were already operating (major commercial arteries). However, they also removed separation distance requirements from residential dwellings. With these recommendations, the majority of body rub centres (over 20) would still be able to operate, and many of them had either a residential dwelling as a direct neighbor, or had residents within one block (all of them except for two). The Regina Police were also in support of the City Administration’s recommendation since this would provide them with information (through the licensing process), and this would allow them full access to enter the body rub centres as required.

This was obviously not liked by many in the community, and they again rallied to advocate for much stronger restrictions. Freedom Catalyst Regina (FCR) was taking the lead on rallying the public and trying to implement a full ban on body rub centres. However, instead of implementing a ban in the context of zoning bylaws (like Steinbach and Dauphin), FCR was recommending incorporating bylaws that would be the rules or tools that the police could still use to enforce the ban. The goal was to still provide the tools that the police desired, but also to make it very clear in written bylaws that body rub centres are not allowed to operate in the city. These bylaw tools would be the evidence that can be assessed to determine if an illegal body rub centre was operating, and what the consequences or fines would be if they were in operation. Recommendations for draft bylaw tools included the following:

Evidence to Further Check on an Establishment and/or to Enforce a Ban:

- 1. Advertising is occurring with wording related to the appearance of the girls using the words, sexy, etc. or with similar pictures*
- 2. Advertising is occurring in known adult entertainment/dating/escort/etc. websites etc.*
- 3. Any admission or implied admission in the media or their own webpage of acting as a body rub parlour*

4. *Any undercover evidence of offers of sexual activity (even if the owner claims the worker did it on their own without their knowledge)*
5. *If the owners or workers are known to have been previously convicted in the past 5-10 years related to prostitution, human trafficking, abduction, rape, keeping/living in a bawdy house, or loitering for the purpose of prostitution*
6. *Sufficient complaints or evidence by the public*
7. *If massage/holistic health is being advertised (or found out through undercover investigation) in any hotel room, motel room, guesthouse or other place of public accommodation*
8. *Online reviews indicating implied sexual services (not necessarily binding but as one additional piece of evidence)*

If sufficient evidence is available (such as the above listed examples), that will then allow for inspection. The following will also then be used during inspection in conjunction with the above evidence. Note - some of the bylaws below will not be fully binding but will be used as possible further evidence to help make the decision if infringement is occurring:

1. *Refusal to allow or hindering the checkup process (not necessarily binding)*
2. *The women are dressed in inappropriate clothing (not binding for residential)*
3. *Materials related to sexual activity are found (condoms - new or used, lubrication, etc.) (not binding for residential)*
4. *Ledgers or documents found documenting services of sexual nature (actual or implied)*
5. *Operating outside of specific banned hours (hours that could be specified as appropriate for massage therapists/spas/holistic health businesses)*
6. *Evidence that there are people living in the establishment (bed, abundant personal belongings, etc.) (non-residential only)*
7. *An unusual amount of cash is present, and they are not able to reasonably substantiate legal revenue sources adequate to explain the cash onsite, profits in the books, or personal/business expenditures*

During any actual inspection, the workers must also be interviewed off site, must produce passports/visas and be able to substantiate what type of work they do. All will be informed/reminded of their rights as well as exit resources be made available to them. These interviews will also be provided immediately if any visible indication of injury is witnessed.

An online and paper petition was also created desiring a ban on body rub centres to be implemented, and to create a "Report a John" online service through the Regina Police. During the final City Council vote, the petition had 2176 signatures. A survey was also completed in the area where the majority of body rub centres operated. This survey showed the public and businesses were very concerned about allowing body rub centres to continue to operate in their area (the survey report can be seen in Appendix B). The public also submitted many letters and phone calls to City

Councillors and the Mayor, and many showed up to speak at the City Council meetings.

In the end, City Administration and the Regina Police were still recommending standard licensing bylaws, and not implementing a ban. In September 2019 City Council voted on a ban, and the motion was defeated by a vote of 6 to 5. As a result, Regina is now moving forward with standard licensing bylaws. This was disappointing because this could have been one of the first major cities that shifted the tide in this area and implemented a ban on the only illegal activity that is allowed to be licensed (and therefore approved to operate) in Canada.

Note: Regina City Administration's consultation with other cities was largely focused on Edmonton, and as a result, their recommendations mirrored or were influenced by Edmonton's approach. Just over a week before the Regina final vote, an Edmonton City Council meeting was held where they shifted focus, and are now looking at the merits of implementing a five-year exit strategy on licensing body rub centres. This change is being considered after over 20 years of licensing them, and after 3 years of using a harm reduction approach.

3.0 Advocacy

When advocating to police or City Council it is important to first learn the facts, but then to be patient and persistent in advocacy. It can take many years to change the minds and hearts of elected representatives. Police units can also change year to year and the same advocacy might have to be repeated under different leadership. It is important to be polite and respectful. It is also essential to stick to the issues at hand and where possible, suggest solutions.

Prior to any advocacy, it is imperative to pray for those who will be listening and who have the power to effect change. Our actions and words cannot of themselves change their hearts and minds or give them the will to decrease sexual exploitation (1Timothy 2:1-2).

Defend Dignity can set up a page on their website for the public to send pre-written emails to your city's councilors and mayor. It is an easily shareable link to gain wide public involvement in your city.

3.1 Police Service

There are various ways to engage the police to implement the prostitution legislation (PCEPA) with focus on the 3 prongs: awareness to public that sex buying is illegal, charging men and third party profiteers, and interacting with women to aid in their leaving commercial sexual exploitation.

Ideas for advocating to the police include:

1. Check the city's police website and ask to have it updated on the legalities of prostitution that are in line with PCEPA, if it has not been done yet.
2. Connect with the Staff Sergeant of the department handling prostitution (eg. in Edmonton it was previously called Vice, but now is called the Human Trafficking and Exploitation Unit). If you find that the police service is not receptive to implementing PCEPA, a formal complaint of service can be initiated. This complaint of service is not against a specific police officer but against the service of the police department in general. In addition, you can make a formal complaint to the Police Commission either online or in a public meeting (please see the sample Formal Complaint of Service to EPS letter in Appendix C).
3. Ask your police sergeant to run ads on billboards, buses, and online on the legalities of sex buying. As an example, in Edmonton, there was a campaign that featured ads saying "Buying Sex is A Crime", and the following year the ads were more personal with tag lines added such as "What Will Your Wife Think?" or "What if it was Your Daughter?" (Figure 1).



Figure 1 – Edmonton Prostitution Ads

4. Request that a Report a John online option be implemented. This is a website that Edmonton and other smaller communities in Alberta used until the Summer of 2020. This is a great tool that allows the public to safely, quickly, and anonymously report illegal activity being performed by the buyers. The police then take these reports, and if the report warrants it, will send a registered letter to the owner of the reported vehicle stating that they were reported. The letter explains that buying sex is illegal, and it discusses and informs the reasons why it is illegal. The simple fact that an online Report a John exists, can be a deterrent for customers attending body rub centres. The fact that a registered letter could be sent to them by the police (and their wife, work business owner (if using a company vehicle), or others could read the letter) can also be a major deterrent. Also specifically ask to add, "Attending a Body Rub Centre" to the Report a John website. As an example,

- the Edmonton Police Service was agreeable to this request, when they oversaw the Human Trafficking and Exploitation Unit. This unit is now under the jurisdiction of Alberta Law Enforcement Response Team (ALERT)
5. If there is any paper that continues to advertise body rub centres, ask police to charge the owners for advertising the sexual services of another. If they won't comply, ask the newspaper to stop carrying the ads. In Edmonton, the Journal and the Sun had stopped carrying these ads but a weekly free paper The Vue did not. When asked, they would not stop receiving money to run the body rub centre ads. However, EPS did agree to put their Buying Sex is a Crime ad on the body rub page ads in the Vue. Also, you can ask the businesses you visit who carry these newspapers to discontinue carrying them. In Edmonton, this free paper was available at libraries, coffee shops and stand-alone boxes. The Edmonton Public Library stopped carrying The Vue as did several coffee shops. This paper did go out of business.⁴
 6. Encourage the police to charge men buying sex. If a city licenses body rub centres, it is difficult to charge men buying. In Edmonton, the police can only charge men buying on the street or online through sting operations. It is still important to charge the men in these areas as it adds to awareness and can change society's viewpoint on sex buying.
 7. In Edmonton, men caught for the first time under the law "obtaining sexual services for consideration" are able to take a diversion program called [STOP](#) (Sex Trade Offender Program) where they pay \$750 instead of jail time. In Edmonton, this money goes to an organization that helps women exit commercial sexual exploitation and is a good portion of their funding so charging men is a great way to heal the harm they have caused. In Winnipeg, there is a similar Diversion program operated by the Salvation Army in partnership with the Winnipeg Police Service and the office of the Crown Attorney.

3.2 City Council

1. Attend the City Council meetings on body rub centres. In Edmonton, this information on the dates and times of these meetings can be found by calling the Office of the City Clerk. In your advocacy to City Council, educate the Councillors on the extent of the problem, PCEPA, the illegality of sex buying, the harms happening, and your desire to have women free from sexual exploitation. In Edmonton, the Defend Dignity YouTube video entitled Survivors of Body Rub Parlours (link above) was shown to educate them on what really happens in the body rub centres and the myths associated with them.
2. Visit your own councillor

⁴ <https://www.thestar.com/edmonton/2018/11/15/vue-weekly-closing-its-doors-after-more-than-20-years-as-edmontons-alternative-paper.html>

3. Write a letter to all councilors and mayor.
4. Create a petition:

Both online and paper petitions can be effectively used to engage the public and show City Council the public's desire. When selecting an online petition, for whatever website is chosen, it is ideal to have the following:

- Good technical support
- The entry of addresses and postal codes for the signees
- The ability to download a pdf of the signatures
- The ability to contact the signees with email updates etc.
- A quick and easy process for the signees

In experience from Regina's 2019 petition, significant technical problems were encountered with change.org where people could not sign, or it wouldn't count their signature. It also did not document addresses/postal codes, there was no technical support, and it was not an easy process. As a result, other online petition options besides change.org are recommended.

It is recommended to contact your municipality to determine what is required for an acceptable petition. For example, in Regina, complete addresses and postal codes are only required if the petition is designed for a referendum, but less strict guidelines are required if it is only being used to show community support.

Churches can be contacted to see if they are open to having a paper petition available to sign after Sunday services. Christian retail stores can also be contacted to see if they are open to have a paper copy at their checkout for customers to sign.

An example paper petition (from Regina) can be seen in Appendix D. An example online petition can be seen here: <https://www.change.org/p/city-of-regina-ban-regina-body-rub-massage-parlours-public-consultation> (note: as was previously mentioned, change.org is not a recommended platform).

Tips to keep in mind for the meeting or letter or petition.

- Ask City Council for a moratorium on the body rub centre applications if they are licensed.
- Ask Councillors to earmark money for awareness campaigns along the lines of those described in the police section.
- If the city is following a licensed, harm reduction model and unwilling to stop this practice but are serious about reducing the harm and the demand,

legislate that all men visiting a body rub centre must first scan ID as is required in some bars. The loss of anonymity would greatly reduce body rub centre visits by men. Also, ask for stringent rules regarding distances between body rub centres and schools, playgrounds and daycares thereby limiting the number and proximity to buyers.

- To further decrease demand, ask City Council to increase the amount of money that they charge for the court diversion program. As previously stated, it presently is \$750 in Edmonton, but in Sweden where the Nordic law originated, the fee is a sliding scale of 50 days wages⁵.
- 5. Ask to delicense and close down the body rub centres. Ask councilors to earmark more money for services to women exiting.
- 6. If there is an anti-trafficking organization in your city, they may have to be contacted as the body rub centres may have women there who are trafficked. Women can be brought to Canada from other countries under false pretenses and forced to work in body rub centres. In Edmonton, the organization is ACT Alberta (Action Coalition on Human Trafficking Alberta). The Canadian Human Trafficking Hotline # is 1-833-900-1010.

3.3 How to Get Various Other People Groups Involved

3.3.1 Youth

The youth can have a powerful voice since they are, for the most part, not a group that speaks to City officials on matters very often. However, if they are engaged, it really opens up the City official's eyes and hearts to see that this is an issue that really matters. In Regina, the youth were rallied to attend Council meetings in very large numbers during the 2015 strip club vote. It is believed this was a strong catalyst in having the majority of Councillors vote against a proposed strip club. When the youth are engaged, it also gives the strong incentive that the Councillors should do "the right thing" to give a good impression to the youth.

Make sure to talk to the youth leaders to ensure parents are aware of what is being discussed due to the sensitive nature of the topic. The topic is only suitable for discussion with mature groups of youth.

⁵ Swedish Institute (2010) The Ban against the Purchase of Sexual Services. An evaluation 1999-2008|| p.11. Retrieved from https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/the_ban_against_the_purchase_of_sexual_services_an_evaluation_1999-2008_1.pdf

Here are some effective ways to rally the youth:

- Ask to speak in an assembly to Christian high school students
- Ask to speak at youth groups
- Use engaging media/presentations to rally them to the cause
- Try to find leaders within the youth community that are willing and wanting to take on the challenge of rallying the youth – mentor and guide them through the process as needed

3.3.2 Churches

Communication to/through churches is a great way to rally people to get involved. This can include:

- Asking the pastor to speak on the matter
- Volunteering to speak yourself (sermon or during announcements)
- Asking them to send out an email to their email list
- Find local Christian organizations that have a wide reach to the Christian community as a whole (example: Evangelical Ministerial Associations, etc.), as opposed to individual churches. These groups generally can be well connected to all of the pastors, ministries, etc. and therefore can reach many of the churches through their mailing list etc. However, it is also ideal to contact and meet with churches directly to establish personal connections.

3.3.3 Survivors

One voice that is critical for City Councillors to hear is survivors. They understand the details of the industry from actual experience. Direct conversations (in person or on the phone) with City Councillors with survivors can have some of the greatest impact. In Regina, some survivors contacted City Councillors and from their comments, it is known that this had a significant impact on their decisions. If you don't have these contacts in your area, please contact Defend Dignity to see how they may be able to help.

3.3.4 Lawyers

A common argument/concern that City Councillors or City Administration bring forth is related to legal concerns of restricting, banning, or regulating body rub parlours. If the City's legal arguments lean toward the pro-body rub/prostitution side, it is imperative to counter this with other professional legal opinion.

In Regina, one of the main arguments City Administration made was that banning parlours was not possible due to the Bedford Supreme Court decision (which allowed them to work in parlours for safety reasons). However, these are old laws, and new prostitution laws are now in effect (PCEPA). Another legal argument that is sometimes made is that cities cannot ban/strongly restrict body rub centres (or restrict them with long separation distances) since that might open the city up to legal repercussions from the body rub centre owners. However, if they are informed of the other cities that have banned/restricted body rub centres for many years, that might give them more peace of mind. Having lawyers on your side to speak to City Councillors is a great way to ease any concerns of legal proceedings that might occur if they ban/restrict parlours.

Christian Legal Fellowship is an organization that could also possibly be engaged to help perform legal assessment or provide advice.

Defend Dignity can also suggest lawyers who may be able to provide assistance.

3.3.5 Media

The media is a critical group that can bring information to the masses and inform the public on what is happening. To effectively engage the media, contact various media outlets and let them know you are available for interviews. Press releases can also be sent out to the media from organizations. Encourage the media to continue to cover the topic by sending them thank you emails after they release an article/video.

3.3.6 Social Media

Social media is one of the most effective means to inform and engage the public. The following are ideas that can be used:

- If possible, try to connect with relevant organizations or people that have a large social media following, to send out updates and inform the public. Defend Dignity would be pleased to do social media posts for your organization or church.
- Contact individuals and ask them to share the information.
- Join relevant Facebook groups (i.e. Christian, anti-human trafficking, etc.) in your area and share the information on the group's pages. Even better is to ask them to share the information on their page since that is usually seen by more people.
- Join other national or international relevant Facebook groups to be informed on this topic.

- When there is a public City Council meeting, create a Facebook event for it. That way every single one of your Facebook friends (and other people's friends) can be invited to it. If the information is simply just posted on a Facebook wall, only a limited number of people will see it. Both methods (Facebook posts, and creating event and inviting people to it) should be used in conjunction to reach as many people as possible.

3.3.7 Retired or Ex-Police

Many law enforcement personnel that are currently working with the police are reluctant to speak publicly, or are not able to speak publicly due to conflict of interest. However, they are the ones that can have a tremendous impact on helping Councillors understand what is happening in body rub centres.

Try to find retired or ex-police officers who are able and willing to speak publicly. A retired police officer was able to speak to Councillors during the 2015 Regina strip club discussion, and the Councillors really appreciated his perspective.

3.3.8 Other Advocacy Groups

Determine if there are anti-human trafficking advocacy groups in your area, province, or even nationally that are willing to help and partner with you. Not all sex trade related organizations will likely have the same stance or desire. As a result, try to talk to people that might be aware of the organizations stance, check their website, etc. before dialoguing with them to be the most prepared before contacting them. Defend Dignity can provide you with a list in your area.

3.3.9 General Public

City Councillors have a general mandate to represent the general public and do what is in the public's general interest. As a result, it is critical that the general public speaks up on this. This includes business owners and residents that are affected/surrounded by body rub centres, as well as all of the general concerned public. Encourage as many members of the general public to get involved as possible to create "critical mass", to let the Councillors know where change is needed.

During the 2015 Regina strip club discussion, the Mayor said that they have never had that amount of public engagement, phone calls, and letters on any other topic, ever. Prior to the Council meeting, the Mayor sent out responses to emails stating that they wouldn't be able to stop the strip club from opening because it was zoned properly and they didn't have the authority to stop it. However, due to the huge

public response, they reversed their decision, and stopped it from opening. Very shortly after, the Saskatchewan government reversed their decision on allowing strip clubs with alcohol to operate in the province. It is believed this provincial decision was made, at least in part, due to assessing the public's response in Regina.

3.4 Further Advocacy Tips

The following is a list of further tips to be used during advocacy campaigns or when cities are looking at modifying their body rub centre regulation methods.

1. As much as possible, the church (and public) should have and be promoting a united and common message. Sometimes if multiple viewpoints are being suggested it can be a good thing since it is brainstorming the best options, but also it can sometimes muddy the waters and create confusion. If City Council knows and hears that the public wants clear and specific action, and that the public is strongly united in it, it goes a long way to provide clarity and a strong voice that can create positive change.
 - a. As a result, it is best to talk with all engaged churches, groups, ministries, etc. first to develop a common strategy before anything is released to the public.
 - b. Writing a proper form letter is an excellent way to add a degree of unity. Since the letter is written and available to the public to send to City Councillors, many of the public will simply use that letter. The form letter will also provide clarity to the public on what the church/ministry's stance or recommendations are on this matter. A sample form letter can be found in Appendix E.
 - c. Since not all members of the public are as informed on this topic as some other groups, this also helps to alleviate the problems of the public thinking "I don't know enough about this topic to speak on it or write a letter". The public should be encouraged to share their voice even if they aren't extremely educated on this topic. The more voices the better, and the sum of all of the voices speaking against sexual exploitation is very effective in showing City Councillors that the public cares about this topic.
2. To better inform and engage the public (and church members), consider holding public Body Rub Centre 101 Information sessions. This is another way to provide information that promotes a unified stance.
3. Phone calls and face to face meetings with Councillors are known to be more effective than letter writing. Letter writing should not be discouraged, but as

much as possible, phone calls and requests for face to face meetings with Councillors should be encouraged.

4. A request should be made to the City to setup an email list for interested parties to join to be informed about future meetings on this topic. Most people are not aware of upcoming City Council meetings. If an email list is created, everybody that signed up would be emailed, letting them know of the upcoming meeting. A similar email list (where people can request to join it) can be setup by the ministries or groups that are leading the advocacy in the city. Sometimes a strong show of engagement is required before a city will entertain the idea of setting up an email list. For example, in Regina, after the strip club vote in 2015, they realized the public needed to be consulted on body rub centres, and they therefore setup the mailing list.
5. Sometimes arguments are made by people or Councillors that the reason why the church is involved is because Christians deem this to be a moral issue. This is sometimes used to try and derail or weaken the other side's arguments since they believe morality is subjective. While there is a degree of morality to this topic, it should be made very clear that every criminal law is in place due to the harm it brings to society and individuals. The issue of body rub centres is actually more based on criminality (and the clear harm it brings). It is illegal for men to purchase sex, and it is illegal for others to profit off women selling sex. Illegal activity occurs during every customer transaction. Body rub centres are also prime hotspots for potential human trafficking, and organized crime. Therefore the fact that this activity is illegal should be strongly emphasized to make it clear that this is not just a moral issue, but a criminal one.
6. Sometimes when body rub centres are regulated to be shutdown, they tend to just pop up somewhere else in the city using different business models. Examples can include moving to tanning salons, hotels, or escort services. While escort services have licensing bylaws in some cities (such as Kelowna, Edmonton, Calgary, Saskatoon, and Winnipeg), and they are banned in other cities (Dauphin and Steinbach), this is not as common as body rub centre bylaws. This should be discussed and addressed during advocacy efforts as well.
7. Holding prayer events is critical (especially when City Council is holding meetings on the topic of body rub centres, or when they are deciding or voting on these matters).

8. Use the evidence already gathered by the RCMP and other police departments to convince City Councillors that human trafficking and organized crime occurs in body rub centres. If human trafficking and organized crime involvement is occurring in other Canadian cities, the chances it is occurring in most cities is high as well. Here are some examples:
- a. Asian organized crime group illegally brought more than 500 women into the country to work in body rub centres in Halifax, Montreal, Ottawa, Toronto, Winnipeg, Calgary, Edmonton, and Vancouver (i.e. all across the country)
 - i. <https://www.ctvnews.ca/canada/rcmp-breaks-up-canada-wide-prostitution-ring-1.2308275A>
 - ii. <https://nwasianweekly.com/2015/04/canada-police-7-arrested-in-massive-asian-prostitution-ring/>
 - b. Regina body rub centre worker wants to get out but is having problems due to fear from her pimp
 - i. <https://www.cbc.ca/news/canada/saskatchewan/regina-massage-parlour-worker-fears-for-her-safety-1.2584905>
 - c. Chinese organized crime body rub centre bust in Seattle
 - i. https://www.seattletimes.com/seattle-news/crime/a-crazy-amount-of-money-seattle-police-raid-prostitution-network-in-massage-parlors/?fbclid=IwAR2QT-XY158KwiHfw72NmnBKleHZkW58bqK2R_cijz9PV368fL0qQOqTxs
 - d. Ontario Hell's Angels – human trafficking in the sex trade (body rub centres are not mentioned)
 - i. https://www.cp24.com/news/fifteen-charged-in-drug-and-human-trafficking-ring-involving-biker-gangs-opp-1.4539894?fbclid=IwAR1udknGKFfyfWGZXgQwIu868B07C1_IcGbtLsGsV5gIt7B8iUmzsye3LhU
 - e. Human trafficking in Hamilton body rub centres
 - i. <https://globalnews.ca/news/5347387/project-orchid-joint-police-task-force-hamilton-massage-parlours/>
 - f. Human trafficking in licensed Toronto body rub centres (the article says police admit it too)
 - i. <https://www.cbc.ca/news/canada/toronto/sex-trafficking-licensed-spas-toronto-1.4612213>
 - g. Ottawa human trafficking in body rub centres – 76 charges

- i. <https://nationalpost.com/news/canada/residential-erotic-massage-parlour-police-raid-leads-to-76-human-trafficking-charges>
9. A common denominator in many articles about police raids on body rub centres is that it was sparked by public complaints. While the police clearly are aware of specific body rub parlours that are operating in their city, sometimes they do not have the resources, manpower, or direction given to them (by the City or Chief) to setup a raid. However, if there is enough public complaint, this seems to sometimes be a catalyst that sparks setting up a raid (since the police need to follow up on public complaints). This can sometimes take multiple years, with multiple complaints being received by the public, so do not get discouraged if no action occurs right away – remain diligent in bringing this topic forward to the City and the police, and encourage others to do so as well.

4.0. Aid to Women in or Exiting Body Rub Centres

The following are some ideas that can be used to help the women that are leaving the body rub centres, or to minister to them while they are still there.

1. Research organizations that are reaching out to women in the body rub centres and offer to volunteer. In Edmonton, Salvation Army Women's Outreach (SAWO) was going weekly into body rub centres offering homemade baked goods with a business card listing organizations offering help to exit. Presently, there is only outreach in the Asian body rub centres through SAWO with volunteers speaking Mandarin or Cantonese. Individual churches may be offering this ministry or this initiative can be started. Beulah Alliance Church in Edmonton visits the body rub centres looking to connect with women. In the Toronto, ON area, [Rahab Ministry](#) and [Fight4Freedom](#) do outreach into primarily Asian Holistic Centres and Body Rub Parlours.
2. Volunteer at organizations that provide after-care for women who have exited. This may include organizations that run programs for addiction recovery, as there is often an addiction as a catalyst or a consequence to the commercial sexual exploitation. In Edmonton, these include CEASE (Centre to End All Sexual Exploitation), Adeara (residential faith based long term addiction recovery centre) Hope Mission (running the Wellspring Program – a 1 year addiction recovery program), ACT Alberta, and The Journey (weekend retreats for women to connect and heal).

3. Give and fundraise to the organizations helping women exit the body rubs. These non-profit or not-for profit organizations require ongoing funding to keep operating, and monthly donations or helping with their fundraising events is always needed.
4. Lobby your provincial government to allocate funding to address the specific needs of those who have been sexually exploited. In Edmonton, the provincial government funds Project SEVFIN, a 7-month program with 4 components dealing with education on trauma abuse and control, life skills development, education needs assessment and employability skills. This program is specifically for clients that have been sexually exploited. Provincial governments in Ontario and Quebec have currently assigned the most money to target this problem, but lobbying the other provinces would be very beneficial.
 - a. https://www.theglobeandmail.com/canada/article-ontario-to-invest-202-million-over-five-years-in-massive-strategy/?fbclid=IwAR1m-AP9b1nDzMEJak_zeilKr3d4JABck_C2TZQ1eE-nF0chm9dRbpztP-I

Authors

Susan Holtby

Transitioning from a career as a physiotherapist, Sue Holtby spent twenty years home-educating her four children. A unique volunteer opportunity visiting body rub centres opened her eyes to the sexual exploitation happening in Edmonton. With her family now grown, she dedicates her time to increasing awareness and advocating for the end of sexual exploitation. When she is not doing this work, she enjoys cycling on holidays with her husband, cross-country skiing and shopping at the market.



Devon Hill



"Devon Hill has been a member of Freedom Catalyst Regina since 2015. He has an aspiration to do all he can to engage the church and the public in standing up to create a society free from sexual exploitation. Devon has a passion for research in the area of human trafficking and methods that can be utilized to end this practice. He resides in Regina with his wife Kristen and four children, where he also works as an Engineering Consultant."

Edited by Defend Dignity



Appendix A
Licensing Bylaws

Body Rub Parlour Licensing Bylaws – Freedom Catalyst

Based on research performed on already implemented bylaws across Canada, the following are Freedom Catalyst Regina's bylaw suggestions for body rub parlours, and holistic health establishments in summary form.

For reference purposes, specific towns and cities within North America where these bylaws are already implemented have been included. Links are also provided to these bylaws at the end of the document. **It should be noted the inclusion of these cities/towns after each individual bylaw does not indicate these are the only ones that incorporate that bylaw, but are simply included as examples.** All reference cities/towns are Canadian with the exception of one (Chula Vista, CA – which is also included due to its well written and insightful bylaws).

It should also be noted that various communities do not have bylaws because they have completely banned or restricted the operation of massage parlours in their city/town through zoning bylaws. It is recognized by their council and law enforcement that these establishments invite unwanted problems into the community (illegal activity, exploitation, complaints, etc.), and therefore they are prohibited.

The bylaws have been broken down into three categories: General, License and Operations.

General

- Bylaw wording includes massage parlours and body rub parlours, but also holistic health services (Toronto, Chula Vista)
 - Businesses that do not fall under the above categories are exempt. However, under the discretion of the police or city bylaw enforcers, if a business reasonably suggests that similar services are being offered (based on advertisements placed in adult entertainment sections, sexually suggestive wording, pictures or description of workers in advertisements/websites, online reviews of sexual services offered, community complaints, etc.) licensing and operation under these bylaws can be required
 - This can be used to prevent body rub parlours from changing the business to some other form (spas, tanning salons, etc.) but still provide the same services as before
- Those businesses that are registered massage therapists etc. are exempt (Chula Vista, Pickering)

- Example: “bylaws do not apply to any persons properly registered as a: physician, surgeon, chiropractor, osteopath, aesthetician, exercise physiologist, occupational therapist, physical therapist, or any registered or licensed vocational nurse working under the supervision of a physician, surgeon, chiropractor, or osteopath duly licensed to practice their respective professions”

License

- Workers, operators and owners must apply for a license to operate, pay a license fee, and;
- During the license application, along with other necessary information, the following would be required:
 - Photo ID, photo, address, SIN #, proper/legal name (many cities / towns)
 - Passport (Saskatoon)
 - Nicknames/aliases (Saskatoon, Edmonton, Toronto)
 - Email address and webpages used (Saskatoon, Edmonton)
 - Application must be in person, and be done independently and not through an agent (Hamilton, Pickering, Toronto)
 - Speak English well enough to process the license
 - The requirement to speak English is not meant as a restriction for performing business, but in this business that requires extra precautions to protect people from being exploited, it allows for better assessment on trafficking potential
 - Note: Toronto specifies that if languages other than English are used, a certified translation can be provided at the applicant’s expense
 - Previous addresses and dates for the last 5 years (Chula Vista)
 - Employment history for the last 5 years (Chula Vista)

- A business license history: whether any license was suspended or denied in Regina or other city, including the reason for, and a description of the business (Chula Vista)
- Documentation evidencing entitlement to work in Canada (Hamilton, Niagara Falls)
- Criminal record check (Abbotsford, Kamloops, Coquitlam, Saskatoon, Toronto)
- Approval from the police department (Kelowna, Pickering, Toronto)
- Applicant fingerprints (Chula Vista)
- Floor plan of building (Maple Ridge, Surrey, Pickering, Niagara Falls)
- Schedule of operating hours (Hamilton)
- For employees: letter of prospective employment or engagement from a licensed owner or operator (Hamilton, Niagara Falls, Toronto)
- If rented/leased, written and signed consent from building owner providing consent the building can be used for this purpose specifying the knowledge that this business activity could possibly be at high risk and under inspection by the police/city (Niagara Falls, Hamilton – written consent that the building can be used for this purpose only)
- Signed document from doctor indicating the applicant is free from communicable diseases and fit (Chula Vista, Pickering)
- A signed statement specifying that sexual services will not be offered or provided as well as forced/coerced work or trafficking of others will not be utilized in conjunction with the license
- Documentation of a permanent (Regina) address for at least ___ months prior to the application (to prevent trafficking of transient workers)
- An approved safety plan for all workers (Edmonton)
- Submission of a certificate demonstrating the applicant has completed a minimum of ___ hours of training in massage from a recognized school or institute (Calgary, Airdrie)

- Calgary and Airdrie specify 250 hours
 - Toronto specifies workers and owners must be a member of good standing with a professional holistic association (with a number of requirements to also approve the association itself)
- Anyone applying for a licence must first complete an information course that provides an overview of all the employment standards, regulations, and laws that apply to this type of work so that they know their rights and responsibilities (Edmonton)
 - https://www.edmonton.ca/business_economy/licences_permits/business-licence-information-course.aspx
- Any false statements provided in the license application will cause the application to be rejected (Saskatoon, Niagara Falls)
- Applicant cannot re-apply for license for 1 year if rejected or revoked (Saskatoon)
- License is rejected if previously convicted in the past 5-10 years related to prostitution, human trafficking, abduction, rape, keeping/living in a bawdy house, loitering for the purpose of prostitution, or other major crimes (Chula Vista, Kamloops, Coquitlam, Pickering)
- Each worker/business must include their license number in any print or online advertisement or website (Chula Vista, Kamloops, Toronto)
- Advertisement, promotion and carrying on the business can only be done in the name provided on the license (Hamilton, Pickering, Niagara Falls)
- License process needs to be renewed every 2 years (Pickering and Chula Vista renewal is annually)
 - Chula Vista also requires 12 hours of proven continued education in massage from an approved organization
- If a change of location or a sale/transfer of any interest occurs, the existing license is null and void and re-application is required (Chula Vista, Hamilton, Saskatoon, Niagara Falls)

- Edmonton changed their bylaws so that workers could change locations to escape exploitive situations. Consultation with Edmonton and other jurisdictions may be beneficial to come to the best conclusion.
- A copy of a written contract of/for service between the operator and owner shall be filed with the issuer of the licence (Hamilton, Pickering)
- If the business is a corporation, list of all officers, directors and shareholders and the address of their ordinary residence, and a declaration that the persons named are the only shareholders of the corporation
- The issued license can be suspended for 3 months for any offence (Saskatoon)
- Signed document specifying licensing cost cannot be required to be paid back by a worker to an owner/operator
 - This is to address the practice of traffickers requiring workers to repay arbitrary “fees” through their labour

Operation

- Issued licenses and names of licensed workers must be displayed in the establishment in a prominent public place (Saskatoon, Hamilton, Niagara Falls, Toronto)
- Notification must be provided to law enforcement/city officials within 48 hours when a new worker is employed or when someone is no longer employed (Kelowna, Maple Ridge, Hamilton)
- No individual rooms or areas used for patron services shall have any kind of locking device on the door (Surrey, Burnaby, Maple Ridge, Hamilton)
 - All persons should be able to open any locked doors or windows in the establishment from the inside
- During business hours, no lock or restriction should be used on the entrance door into the reception area, and access to the public should be available without delay or hindrance (Hamilton, Surrey, Burnaby, Maple Ridge)
 - For consideration – Toronto’s says: “Holistic practitioners working in a holistic centre may lock the doors of the centre or a treatment room while working with a client for their mutual security and safety, provided

that whenever the doors are locked the time at which the doors will be unlocked shall be posted in a manner clearly visible from outside the holistic centre and the door must be unlocked by the posted time.”

- All rooms used for patron services must have a transparent or translucent window (with specified dimensions) (Burnaby, Coquitlam, Pickering)
 - Purpose: to prevent owners/operators from making the claim they are unaware that the workers are performing services that contravene the bylaws during an inspection
- Inspection by proper law enforcement or city inspectors should be allowed without delay or hindrance - refusal to provide this inspection results in a revoking of the license (Saskatoon)
- A record of the date/time/cost/nature of all services performed and patron name/address/phone number (photo ID must be shown), must be kept for period of __ years and open for inspection by law enforcement/city inspectors (Coquitlam, Chula Vista)
- An itemized and serial numbered receipt is required to be issued with services performed (Hamilton, Toronto)
- Documentation and proof of the salary or commission paid to each employee/operator is required to be kept and provided to an inspector upon request (Hamilton)
- To reduce the chance of trafficking occurring in any establishment, workers, operators and owners must meet with an inspector ___/year (alone and away from the licensed establishment) for discussion to determine they are not being trafficked. Must be in possession of passport at the time. If a licensee is no longer employed or associated with an establishment, a meeting must be initiated and attended within one week of when this occurred (not in other bylaws but relates to other procedures)
 - During discussions with a Chula Vista police officer in the vice squad, he commented that this was a really good idea and that he will bring it up to his group to try and get it implemented in their bylaws
 - If a person is identified to being trafficked, there needs to be a service available for the inspector to take the worker to immediately for their personal safety and welfare

- A list of services available and the cost associated with them should be posted in an open public place onsite and with the licensing department - no services other than those posted are allowed (Chula Vista, Toronto)
- Advertising can't reasonably suggest anything other than a body rub (or the list of services provided) is available (Calgary, Airdrie, Winnipeg)
- No onsite signs should display any nudity, sexually suggestive or implied text, pictures, or descriptions of employees/services (Burnaby, Maple Ridge)
- No advertisement (print or online) should display any nudity, sexually suggestive or implied text, pictures, or descriptions of employees/services (Kamloops)
- A sign is required to be posted in the lobby or entrance of the establishment (or preferably in patron signed intake documents) mentioning, "These premises are licensed as a body-rub parlour (or holistic health services establishment) by the City of Regina. The bylaw regulating these premises makes it an offence for any person to provide services designed to appeal to erotic or sexual appetites or inclinations in this establishment. As per federal law, it is also a criminal offence to purchase sexual services." (Hamilton, Niagara Falls, Chula Vista)
- No practitioner, operator, or owner (and no person should permit another person) should be present in any area with another person unless their genitals and other sexually defined areas are fully covered with an opaque covering. Appropriate attire (deemed proper for a professional establishment) is required to be worn at all times when in the same area as a patron. (Toronto, Pickering, Surry, Calgary, Winnipeg, Chula Vista).
- No person shall permit any other person to massage or intentionally touch the genitals or other sexually defined areas of another person. No sexual activity is allowed between two or more persons in the same area. (Chula Vista, Maple Ridge, Pickering, Niagara Falls)
- Engaging in prostitution in the establishment is prohibited (Kamloops)
- Inspector should randomly inspect location ___ times per year to assess compliance to the bylaws (Chula Vista's bylaws mention 4 times/year)
- Limited hours of operation (ex. 8:00am – 9:00pm) (Surrey, Burnaby, Maple Ridge, Coquitlam, Edmonton, Toronto)
- All workers, operators and owners must be in possession of their own cell phone

- All licensed workers/owners must wear their city/police issued photo ID card (with license # and real name) at all times when in the establishment (Chula Vista, Hamilton)
- Restrictions specifying patrons are not allowed to touch employees/operators/owners (Calgary)
- Offence/infraction fine \$ amounts are detailed and specified in the bylaws (Saskatoon, Airdrie)
- All rooms/areas used for patron services may not contain a mattress, futon, bed, couch, chair or other item of furniture that could reasonably be used as a bed (Maple Ridge, Coquitlam, Niagara Falls)
- Unlawful for any person to engage in the business of massage/holistic health in any hotel room, motel room, guesthouse or other place of public accommodation (Chula Vista)
 - Exemptions are granted for places like hospitals, senior care facilities, etc.
- No part of the premises should be used as a dwelling or for sleeping (Hamilton, Niagara Falls, Pickering)
- No worker, operator or owner may reside at the place of business
- Two workers are always required to be present for the safety of the individuals (Edmonton)
- Building sanitation requirements to ensure public safety (Pickering and others)
 - Toronto has good bylaws in this area
- Cameras and video cameras are not allowed to be used onsite with the exception for security purposes and by bylaw officers/inspectors and police
- Question: What to do with people who claim to just be cleaning staff etc. during an inspection by city officials/police?
 - Should all contractors doing cleaning etc. be required to be specified on record? Further discussion/consultation required.

References

Surrey: http://www.surrey.ca/bylawsandcouncilibrary/BYL_reg_13680.pdf

Burnaby: <https://bylaws.burnaby.ca/media/13000/13809.pdf>

Kelowna:

<http://apps.kelowna.ca/citypage/docs/pdfs/bylaws/Business%20License%20and%20Regulation%20Bylaw%20No.%207878.pdf>

Kamloops: <https://kamloops.civicweb.net/document/8290/9-60.pdf?handle=1F692302ED6942488C56870E78DF6496>

Maple Ridge: <https://www.mapleridge.ca/DocumentCenter/View/521/Business-Licencing-and-Regulation?bidId=>

Coquitlam: <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=1668098>

Edmonton: <https://www.edmonton.ca/documents/Bylaws/C13138.pdf>

Calgary: <http://www.calgary.ca/PDA/pd/Documents/licence/53M2012-Body-Rub-Licence.pdf>

Airdrie: <http://www.airdrie.ca/getDocument.cfm?ID=195>

Saskatoon: <https://www.saskatoon.ca/sites/default/files/documents/city-clerk/bylaws/9011.pdf>

Winnipeg:

<http://winnipeg.ca/cms/BLES/LS/pdfs/Body%20Rub%20Parlour%20Body%20Rub%20Practitioner.pdf>

Pickering:

https://www.pickering.ca/en/cityhall/resources/B6649_06BodyRubParlour.pdf

Hamilton: <http://www2.hamilton.ca/NR/rdonlyres/C69F9609-63FA-44FD-8B8F-231795C28583/0/07170LICENCESANDTAXIS.pdf>

Niagara Falls: <https://www.niagarafalls.ca/pdf/by-laws/adult-businesses-by-law.pdf>

Toronto: http://www.toronto.ca/legdocs/municode/1184_545.pdf

Chula Vista:

<http://www.codepublishing.com/CA/ChulaVista/html/ChulaVista05/ChulaVista0536.html>

Appendix B
Sample Community Survey - Regina

Overview

In July 2019, every house and business was knocked on or entered with the attempt of asking if they are willing to answer the survey questions. The areas that were surveyed include the following:

- Victoria Ave from Arcola to Broad (in the Heritage Community)
- 1800 & 1900 block Ottawa St. (i.e. the two blocks north of Victoria Ave. – in the Heritage Community)
- 2400 block Harvey St. and 600 block 17th Ave. E (Baseline #1)
- 100 block Woodward Ave. (Baseline #2)

The two baseline areas were used as control areas to assess the responses from a random area of Regina to determine differences in responses to the Heritage Community.

The survey results documented whether they were residents or a business, and whether they chose to remain anonymous (in terms of their address).

The questions asked were:

Question #1: “Are you concerned about the body rub parlours in your neighbourhood or the Heritage Community?”

Question #2: “Are you concerned about prostitution in your neighbourhood or the Heritage Community?”

Question #3: “Are you concerned that the City is removing the restrictions from being within 183 m of family residences and parks for body rub parlours?”

Question #4: “Are you concerned that the Heritage Community Association is advocating that body rub parlours should be allowed in your area (on the main strip of Victoria) and that they are saying citizens are not generally concerned about it?”

Also when surveying the baseline/control blocks, to obtain better and more relevant data, Questions #1 and #2 were slightly modified to:

Question #1: “Are you concerned about the body rub parlours in Regina?”

Question #2: “Are you concerned about prostitution in Regina?”

The survey respondents could select an answer from Yes, No, Indifferent, and Undecided. They then ranked all Yes or No questions from 1 to 10, with 1 being not strongly believe, and 10 being strongly believe.

Appendix C
Sample Letter to Police Regarding PCEPA
Enforcement

Susan Holtby
10460 20 Ave NW
Edmonton, AB
T6J 5A2

October 17, 2016

Chief Rod Knecht
C/O Police Commissioner Office
10060 Jasper Avenue, #1803 Scotia Place Tower 2,
Edmonton, AB
T5J 3R8

Dear Police Chief Knecht,

My name is Susan Holtby and I have been a resident of Edmonton for almost 40 years. This letter is a complaint of service for the lack of implementation of Bill C-36, the Protection of Communities and Exploited Persons Act that was enacted December 6, 2014. This letter is specifically addressing the lack of enforcement in the city's body rub parlours. Despite our city licencing these body rub parlours, I believe that the Criminal Code of Canada supercedes municipal by-laws. The Criminal Code treats prostitution as a form of sexual exploitation, which mainly affects women and girls. It seeks to protect vulnerable women and communities and decrease demand by charging the buyers, the advertisers, and those receiving a material benefit from the sale of sexual services. In Edmonton body rub parlours, women and communities are not protected and the buyers, advertisers and owners have impunity.

While respectfully attempting to encourage the EPS to enforce Bill C-36, I have often felt a lack of understanding or commitment towards enforcement of the new law. This has been evidenced in the following examples:

1. Despite Bill C-36 being passed in Dec 2014, the EPS website was not updated until February 2016. This was after I sent an initial e-mail on September 25, 2015 inquiring when the website would contain correct information regarding the buying of sex. I continued to send e-mails on November 15, 2015, January 18 and 27, 2016. In early February 2016 it was finally updated. While there were apologies for not making it a priority, I feel this time lag was unacceptable. I am also not certain that without urgings from the public that the website would have been updated to reflect the current law.
2. The EPS website now correctly states that the selling of sex in Canada is legal, but the purchasing of sex is illegal in all circumstances. Dale Johnson, Staff Sergeant of Vice has said "we all know what is going on in them (body rub parlours)" and Ken Brander publically stated in the Edmonton Journal in Oct 2012, "we've never come across one (body rub parlour) where prostitution is not occurring". He goes on to state the obvious, "It's not a job like any other. These places are extremely vulnerable to exploitation. It's the nature of prostitution". So prostitution is happening in Edmonton body rub parlours, women are being exploited, men are buying sex with impunity and the EPS are aware of it.
3. Despite the EPS website now stating the legislative objective: "Denounce third party profiteering, especially in commercialized contents, e.g. strip clubs, massage parlours and escort agencies" both Staff Sergeant Dale Johnson and Acting Staff Sergeant Lee Bieraugle have said that they are "neutral on massage parlours". How can this be when the EPS site states that they are to

denounce them? Dale Johnson was asked if he would like to speak at the city council meeting for the massage parlour task force on Feb. 22, 2016 where the city councilors were deciding if they should remove the moratorium on licensing additional massage parlours. Though he attended the meeting he declined to speak, stating that he was neutral on the body rub parlours. Previously, EPS had denounced them as documented in the Task Force Report; “those with professional obligations to uphold the law were uncomfortable with the City of Edmonton continuing to license the body rub industry.” I believe the present EPS position on this issue was a significant contributing fact in the moratorium being lifted. In addition, Task Force recommendation #16 that required the body rub centres to undergo an enhanced security screening was not supported. This would have enabled the identification of applications made by organized crime or gangs, as recommended by the Executive Director of CEASE (Centre to End All Sexual Exploitation).

At a meeting with myself and other concerned citizens on September 28, 2016, Lee Bieraugle, representing EPS also stated that he was neutral on the issue of the city body rub parlours. He said he would have to look into the objectives on the website as he didn't know this objective was listed.

4. It has been well known that Asian gangs have been operative in the massage parlours. In an article on December 2009 it was stated by CBC, “Asian gangs are getting involved in Edmonton's lucrative adult massage parlour business, Edmonton police say.” In that year, the article states that the police shut down nine massage parlours. To my knowledge, EPS has not shut down any parlours since our laws changed and yet a Salvation Army worker who visits the Asian parlours weekly (and speaks to them in Chinese) described conditions that very clearly painted a human trafficking situation. This testimony was given at the City Council meeting on February 22, 2016. She described huge turnover of women, (weekly in most cases), and the women were not from Edmonton but from Vancouver, Toronto, or China with no family locally. They worked long hours with no days off and they had little freedom of movement. (Her testimony can be heard on Sire Public Access of February 22 meeting at 1 24:25). At this meeting, one city councilor also voiced his concern that the situation, as described, seemed to point to human trafficking. In light of this information, how can EPS be neutral and not implement our federal law by investigating these body rubs?

5. It is an offence to knowingly advertise an offer to provide sexual services (Bill C-36 section 286.4). However, the VUE Weekly paper continues to have a 2 page spread of massage parlours - approximately 20 are advertised weekly and it is clear that these businesses are offering the purchase of sex. Despite this being the only paper that now carries these ads, EPS has not only ignored these ads but also recently placed a full-page ad in the VUE running from Sept 22-26. If the EPS is not going to investigate the VUE Weekly and charge the paper under this section, the least it could do is not support this paper by advertising for new recruits in it. Alternatively, EPS could easily take out an ad on these pages stating, “Buying sex is a crime”.

6. Lee Bieraugle stated that due to fiscal and manpower restraints, the Vice section is concentrating on street prostitution and the on-line buying of sex. He also stated that EPS is presently continuing to go into the massage parlours with city by-law officers. In what other business does bylaw enforcement require Vice to go in with them for the safety of the bylaw officer? He stated that they are looking to help the women and see if there is any underage or trafficked women. While this is noble, their job is not to help the women (CEASE, Salvation Army, DECSA, etc. have this mandate) and the job of the EPS is to enforce the law against those buying sex and those operating businesses that support this activity.

7. In the past, Vice seemed to be more vocal in the harms done to women in the body rubs. In a 2012 article, entitled “Edmonton Sex Parlours and Prostitution Laws” the detective debunked the

city's harm reduction model. The article said "It's safer to have three girls working inside of a building than standing on the streets alone," one woman (owner) told Global Edmonton. The Vice Unit disagrees. **"The bylaw was never intended to offer some kind of refuge for criminal activity,"** Detective Ken Brander explained to Global. "If someone is advertising sex for money services, if they're screening customers, if they're supplying rooms, if they're supplying clothing, condoms, all those things, and then in return getting money for that, if they're living off the avails, all those things are criminal offences."

However, presently, the bylaw is offering a kind of refuge to criminal activity. In another Edmonton Journal article in 2012 an owner of a downtown body rub was charged with running a brothel after a complaint from the public led to a investigation. Why can we not continue to do these investigations?

Thank you for your time and effort in considering my complaint of service. I think that the EPS could do much to decrease the demand for purchasing sex by enforcing Bill C-36 in the city's body rub parlours.

Sincerely,

Susan Holtby
Home: (780) 434-0344
Cell: (587) 783-7804
E-mail: jsholtby@telus.net

Appendix D
Sample Petition

PETITION TO OPPOSE REGINA NON-THERAPEUTIC MASSAGE PARLOURS/SEX TRAFFICKING (also known as **body rub parlours or brothels**)

The City of Regina is initiating a public consultation on how to handle the concern of body rub parlours (massage parlours/brothels). There are currently between 17-21 of these body rub parlours operating in Regina, SK.

We as Freedom Catalyst Regina (an anti-human trafficking organization) are opposed to permitting body rub parlours to operate in or around Regina. We believe that these body rub parlours will do any or all of the following:

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Cost Regina residents additional tax dollars to provide additional policing, trauma care, addictions treatment, counselling for post-traumatic stress, and City enforcement. 2. Foster increased crime and the presence of organized crime – including promoting the wrong idea that buying sex is legal. 3. Reduce the desirability and real estate value of the surrounding businesses and homes. 4. Encourage the type of tourism that we do not want. | <ol style="list-style-type: none"> 5. Create major safety concerns and problems for workers and clients (regardless of where they might be located in the city). 6. Exploit vulnerable girls, youth, and women. 7. Set an unwanted example, and increase sexually transmitted diseases for the members of our community. 8. Endanger, risk injury, and increase human trafficking for the marginalized and vulnerable workers within these businesses, and increase and the sex trade in our city. |
|---|--|

Mr. Mayor Fougere and City Councillors, we the undersigned do not want body rub parlours to operate in Regina. We also support implementing an online “report a john” webpage (similarly to the one used by the Edmonton Police) for the public to report illegal sex trade work. Please do everything in your power to reject any form of human trafficking and sexual exploitation in our city!

Date	PRINT Name	Address, City, Postal Code	Signature	Witness Signature

Please scan and submit back to Freedom Catalyst Regina (fcr@sasktel.net) for final tallying.

Appendix E
Sample Form Letter

Date: _____

To: City Council re: Body Rub Establishment Licensing

Canadian Protection of Communities and Exploited Persons Act (PCEPA) has now made it legal to sell intimate body massage to protect the vulnerable trapped young workers from further injury from our justice system.

However, PCEPA still makes it illegal to purchase these services (johns), for others to profit from the sale of it (owners/pimps), or advertise (by owners/pimps only).

- You have voted to allow body rub establishments in our Regina industrial areas. I am in opposition to allowing them in Regina.
- You will be voting on licensing the owners or operators (pimps) as recommended by Regina City Administration. This is still illegal in Canada as clearly outlined in PCEPA. I am in opposition to licensing them. We cannot and should not license illegal activity in our City. Illegal activity should be enforced to be stopped, not sanctioned through licensing.
- While the claim of those recommending licensing is that our street workers will be better protected; I disagree. Past workers of other licensed body rub establishments in Canada report, or are found, to being abused, neglected and trapped.¹ Imagine if it were your sister daughter, niece or grandchild. These establishments are known to employ vulnerable Asian women; and not our Regina street workers in most cases.
- If these owner/operators (pimps) are licensed, it will be nearly impossible to arrest and charge them for pimping, since that is what they would be licensed/sanctioned to do by our city officials.
- If workers are licensed, during the application process, there should be something enacted where if any deception or falsehood is used (eg. stating owners are not involved, but they are found out to be involved), that would be cause for automatic revoking of the license and a ban on re-applying for multiple years. There needs to be proper documentation in place during the application that the workers can attest/sign that owners are not involved.
- In addition, please ensure that our police hands are not additionally tied by requiring them to give notice before attending these establishments for checkups, since this would allow all evidence of human trafficking or owner/pimp involvement to be removed in advance.

Please do not allow or license pimps/owners in our city.

Please put in the proper paperwork during the application process to ensure workers attest/sign that no owners are involved, and that licenses are revoked (and reapplication cannot occur for several years) if any false statements are made during the application. This is a **critical** requirement for the safety of the workers to add proper checks and balances to protect against possible human trafficking situations from occurring.

Please allow police to do their job without hands tied by allowing them to check up on these body rub establishments unannounced (without having to book appointments in advance).

Your citizens are counting on you. Thank you!

Name:

Phone #:

Email:

1: <https://www.ctvnews.ca/canada/rcmp-breaks-up-canada-wide-prostitution-ring-1.2308275>