



# Polaris

Freedom happens now.

May 2, 2019

Dear Chairwoman Waters and Ranking Member McHenry,

As the largest organization working to fight both sex and labor trafficking in the United States, Polaris would like to offer our strong support for the Corporate Transparency Act and our gratitude for your commitment to moving it forward. This important legislation would give law enforcement a vital tool in their fight against human trafficking - the ability to hold the actual trafficker accountable.

Currently, that is extremely difficult to do in many of the 25 types of human trafficking in the United States as identified in the 2017 Typology of Modern Slavery. But it is particularly problematic in illicit massage parlor trafficking, which has been in the news of late because of the arrest of New England Patriots owner Robert Kraft in connection with a massage parlor raid in South Florida.

Since 2007, Polaris has operated the National Human Trafficking Hotline, which is supported by a grant from the U.S. Department of Health and Human Services and by private donations. An analysis of the data from the National Hotline shows massage parlor trafficking is the second most common type of case reported, after trafficking related to escort services.

With this in mind, Polaris delved deeply into this nefarious world in search of information that can lead to strategic interventions and ultimately, to the end of trafficking in these venues. We identified some 9,000 locations likely to be illicit massage businesses, off the exit ramps of rural highways, lining the sides of city streets and tucked into suburban strip malls in every single state. More details about how massage businesses trafficking works in these venues is available in our comprehensive Human Trafficking in Illicit Massage Businesses report.

As the report details, most illicit massage businesses are part of an organized crime network that includes at least one other illicit massage venue as well as non-massage venues such as nail salons, restaurants, grocery stores, and cleaners. These non-sex related businesses are used to launder money from the illicit massage businesses.

If all of the businesses had actual names of owners recorded in their paperwork, law enforcement could more easily conduct money laundering and/or tax evasion investigations that lead back to the actual owners of the trafficking venues. Such investigations can lead to significant prison sentences, fines and disruption of the trafficking network.

But our analysis, found that of the 6,000 massage parlors with any business records only 28 percent had an actual person listed at all and only 21 percent specified the name of the owner. Even in those cases, there was no way to know if that information was legitimate.

Without knowing who owns the business, law enforcement can do little more than sweep into a property and arrest everyone on the premises. That rarely includes the actual business owner/trafficker. Far too often, it includes trafficking victims, who are charged with prostitution.

These arrests actually make life easier for traffickers, who tell the women under their control that they have no options for seeking assistance once they become involved in the massage parlor world. The women are told that police see them as prostitutes, not as victims, that they are considered trash, and that no one will help them out of their situations. When the women are then swept up in police raids, the traffickers are proven right. No one self-identifies as a trafficking victim. The cycle of devastation and trauma continues.

Indeed the outcome of the Kraft operation so far is the final word on why law enforcement needs better tools to investigate trafficking and hold traffickers accountable. All available information about that raid suggests that the spa in question had all the hallmarks of a trafficking venue, most notably that the women appeared to be living in the venue, sleeping on the massage tables where they provide commercial sex. But the case to date has not resulted in trafficking charges because the women have not self-identified as victims. The traffickers are emboldened.

We have seen it all happen before, and if nothing changes, we will see it again, and again, and again. Meanwhile, thousands of vulnerable people will continue to be recruited into lives they did not choose, do not want and cannot leave.

If we want to end human trafficking, we must lift the veil of corporate secrecy that protects human traffickers.

Sincerely,

Bradley Myles  
Chief Executive Officer, Polaris